

Attachment 2: Comments Received on the Supplemental Draft EIS

Lebold, BillieJo

From: Pfeiffer, Daniel
Sent: Thursday, May 21, 2015 12:01 PM
To: Richardson, Mary
Cc: Caufman, Robin; Lebold, BillieJo
Subject: Re: Minnesota SWLRT--freight rail is fundamental flaw

Mary,

The SDEIS comments are being directed to the SWLRT email address. Billie is supposed to be grabbing from that mailbox for processing.

Thanks

Dan Pfeiffer
Assistant Manager, Public Involvement
612-373-3897
Daniel.Pfeiffer@metrotransit.org

METRO Green Line Extension (Southwest LRT) Project

METRO Blue Line Extension (Bottineau LRT) Project

Sent from mobile device

On May 21, 2015, at 11:59 AM, Richardson, Mary <Mary.Richardson@metrotransit.org> wrote:

From: Maya.Sarna@dot.gov [<mailto:Maya.Sarna@dot.gov>]
Sent: Thursday, May 21, 2015 11:14 AM
To: swlrt
Subject: FW: Minnesota SWLRT--freight rail is fundamental flaw

Please be sure to include this in the comments for SDEIS.

Thank you,

MAYA SARNA
(d) 202.366.5811 | (e) maya.sarna@dot.gov

From: Simon, Marisol (FTA)
Sent: Thursday, May 21, 2015 12:05 PM
To: Wheeler, William (FTA); McLemore, Cyrell (FTA); Owen, Benjamin (FTA); Brookins, Kelley (FTA); Loster, Kathryn (FTA); Sarna, Maya (FTA); Ciavarella, Jason (FTA)
Subject: FW: Minnesota SWLRT--freight rail is fundamental flaw

Fyi

Sent with Good (www.good.com)

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

From: George Puzak [greenparks@comcast.net]

Sent: Thursday, May 21, 2015 11:58 AM Eastern Standard Time

To: McMillan, Therese (FTA); Jackson, Brian (FTA); Simon, Marisol (FTA); Comito, Cecelia (FTA); Clements, Sheila (FTA)

Subject: Minnesota SWLRT--freight rail is fundamental flaw

Dear Ms. McMillan, Mr. Jackson, Ms. Simon, Ms. Comito, and Ms. Clements:

I'm contacting you as officials of the Federal Transit Administration (FTA) to express my concern about the proposed Southwest Light Rail Transit (SWLRT) line in Minnesota. I am writing to give you some new information about the project's timeline, flaws, and a remedy.

Even if cost surprises and lawsuits don't torpedo SWLRT, a fundamental flaw should—Hennepin County's failure to include freight rail in the project's "scoping process." Required by the National Environmental Policy Act (NEPA), scoping is the first step in environmental review. It identifies the issues, alternatives, locations, and modes of transport to be studied in a transit project's environmental impact statement (EIS). But Hennepin County, in both its 2009 Scoping Report and 2010 Locally Preferred Alternative (LPA), failed to include freight rail as part of SWLRT. Five cities then proceeded to vote and approve that faulty 2010 LPA. In 2011, despite receiving notice from the Federal Transit Administration that freight rail is part of SWLRT, Hennepin County failed to amend the scoping report and re-open scoping for public comment, and thus violated NEPA.

Compounding the problem, in summer 2014, the Met Council imposed yet another, fundamentally different plan to be approved, this time through municipal consent: while the 2010 LPA approved by five cities had omitted freight rail in Minneapolis' Kenilworth corridor, this 2014 plan included it. Yet, the Met Council provided no Draft EIS on freight rail, LRT tunnels, and soil conditions. Citizens lacked critical information and officials from Minneapolis and four other cities were forced to vote on municipal consent.

The current plan would run electric-sparking LRT trains as close as 15 feet from freight trains (carrying as many as 100 cars of ethanol — an explosive whose flash point is below that of oil) through residential neighborhoods, over the Chain of Lakes Kenilworth Channel, and through downtown next to Target Field. *But this arrangement was never included in the primary scoping phase.* This omission limited the choice of transit options and alignments that citizens and decision makers considered. Further, neither citizens nor public officials had information about the 2014 plan's environmental and public safety risks.

Contrary to law, the Met Council has limited the choice of reasonable alternatives and alignments. Reducing costs, studying freight rail in the Supplemental DEIS, and re-opening municipal consent are not sufficient remedies. The scoping process must be re-opened to fix SWLRT.

I respectfully request that the FTA direct the Met Council to re-open the scoping process. The Met Council must prepare an Environmental Document that uses current FTA evaluation criteria and updated ridership and cost information. This process will produce an updated Locally Preferred Alternative that resulted from a proper NEPA (National Environmental Policy Act) process. Thank you for your consideration.

George Puzak
cell 612.250.6846
greenparks@comcast.net
1780 Girard Avenue South
Minneapolis, MN 55403

Lebold, BillieJo

From: swlrt
Sent: Friday, May 22, 2015 2:29 PM
To: Lebold, BillieJo
Subject: FW: Notice of Availability: Southwest Light Rail Transit Supplemental Draft EIS

From: Maya.Sarna@dot.gov
Sent: Friday, May 22, 2015 2:29:13 PM (UTC-06:00) Central Time (US & Canada)
To: swlrt
Subject: Notice of Availability: Southwest Light Rail Transit Supplemental Draft EIS

All,

The Southwest Light Rail Transit (LRT) (METRO Green Line Extension) Supplemental Draft Environmental Impact Statement will be available for review and comment on Friday, May 22, 2015. An electronic version of the document can be found at <http://metro council.org/swlrt/sdeis> on Thursday, May 21, 2015. Hard copies of the document are available at the local libraries and city halls along the alignment, listed below, as well as at the Southwest LRT Project Office.

The Southwest LRT Project is an approximately 16-mile proposed extension of the METRO Green Line (Central Corridor LRT) that would operate from downtown Minneapolis through the communities of St. Louis Park, Hopkins, Minnetonka, and Eden Prairie, passing in close proximity to Edina.

The Federal Transit Administration (FTA) is the federal lead agency under the National Environmental Policy Act and the Metropolitan Council (Council) is the state lead agency under the Minnesota Environmental Policy Act for development of the Southwest LRT Supplemental Draft EIS. The Supplemental Draft EIS is needed because the FTA and Council determined that design adjustments made to the project following publication of the Draft EIS in October 2012 needed to be evaluated for environmental impacts that have the potential to result in new adverse impacts.

To request a CD of the document, contact Nani Jacobson, Southwest LRT Assistant Director for Environmental and Agreements, Metropolitan Council, at nani.jacobson@metrotransit.org.

The Notice of Availability will be published in the Federal Register on May 22, 2015 and comments will be accepted through Monday, July 6, 2015. Comments can be submitted by three methods:

- Email: Written comments can be submitted to SWLRT@metrotransit.org
- U.S. Mail: Written comments can be mailed to
Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit - Southwest LRT Project Office
6465 Wayzata Blvd., Suite 500
St. Louis Park, MN 55426

- **Public Hearings:**
Formal testimony will be accepted at one of three public hearings in June 2015 (see below for dates). The public hearings will each be preceded by an open house, where people can learn more about the Southwest LRT Project and the Supplemental Draft EIS.

The Southwest LRT Supplemental Draft EIS open houses and public hearings will take place as follows:

Tuesday, June 16, 2015
Hopkins Center for the Arts
1111 Main Street
Hopkins, MN 55343
Open House: 5:00 PM
Public Hearing Start: 6:00 PM

Wednesday, June 17, 2015
Eden Prairie City Hall
8080 Mitchell Road
Eden Prairie, MN 55344
Open House: 5:00 PM
Public Hearing Start: 6:00 PM

Thursday, June 18, 2015
Dunwoody College of Technology
818 Dunwoody Blvd
Minneapolis, MN 55403
Open House: 5:00 PM
Public Hearing Start: 6:00 PM

The Supplemental Draft EIS is available for viewing at the following locations:

Eden Prairie City Hall: 8080 Mitchell Road, Eden Prairie, MN 55344

Eden Prairie Public Library: 565 Prairie Center Drive, Eden Prairie, MN 55344

Minnetonka City Hall: 14600 Minnetonka Blvd, Minnetonka, MN 55345

Minnetonka Public Library: 17524 Excelsior Blvd, Minnetonka, MN 55345

Hopkins City Hall: 1010 First Street South, Hopkins, MN 55343

Hopkins Public Library: 22 Eleventh Avenue North, Hopkins, MN 55343

Edina City Hall: 4801 West 50th Street, Edina, MN 55424

St. Louis Park City Hall: 5005 Minnetonka Blvd, St. Louis Park, MN 55416

St. Louis Park Public Library: 3240 Library Lane, St. Louis Park, MN 55426

Southwest LRT Project Office: 6465 Wayzata Blvd., Suite 500, St. Louis Park, MN 55426

Minneapolis City Hall: City Engineer's Office, 350 South Fifth Street, Room 203, Minneapolis, MN 55414

Lebold, BillieJo

From: swlrt
Sent: Friday, May 22, 2015 2:02 PM
To: Lebold, BillieJo
Subject: FW: Notice of Availability: Southwest Light Rail Transit Supplemental DEIS

From: Maya.Sarna@dot.gov
Sent: Friday, May 22, 2015 2:01:30 PM (UTC-06:00) Central Time (US & Canada)
To: swlrt
Subject: Notice of Availability: Southwest Light Rail Transit Supplemental DEIS

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Hopkins City Hall: 1010 First Street South, Hopkins, MN 55343

Hopkins Public Library: 22 Eleventh Avenue North, Hopkins, MN 55343

Edina City Hall: 4801 West 50th Street, Edina, MN 55424

St. Louis Park City Hall: 5005 Minnetonka Blvd, St. Louis Park, MN 55416

St. Louis Park Public Library: 3240 Library Lane, St. Louis Park, MN 55426

Southwest LRT Project Office: 6465 Wayzata Blvd., Suite 500, St. Louis Park, MN 55426

Minneapolis City Hall: City Engineer's Office, 350 South Fifth Street, Room 203, Minneapolis, MN 55414

Minneapolis Central Library: 300 Nicollet Mall, Minneapolis, MN

Walker Public Library: 2880 Hennepin Avenue, Minneapolis, MN 55408

Linden Hills Public Library: 2900 West 43rd Street, Minneapolis, MN 55410

Sumner Public Library: 611 Van White Memorial Blvd., Minneapolis, MN 55411

Franklin Public Library: 1314 East Franklin Avenue, Minneapolis, MN 55404

Metropolitan Council Library: 390 Robert Street North, St. Paul, MN 55101

Minnesota Department of Transportation Library: 395 John Ireland Blvd., St. Paul, MN 55155

Minnesota Legislative Reference Library: 645 State Office Building, 100 Rev. Dr. Martin Luther King, Jr. Blvd. St. Paul, MN 55155

Translation services for non-English speakers and ADA accommodations will be provided on request. To request translation or ADA accommodations, please contact Dan Pfeiffer, Southwest LRT Assistant Public Involvement Manager, at 612-373-3897 or Daniel.pfeiffer@metrotransit.org at least five days prior to the hearing.

Thanks!

MAYA SARNA

FEDERAL TRANSIT ADMINISTRATION | OFFICE OF ENVIRONMENTAL PROGRAMS
1200 NEW JERSEY AVENUE SE | WASHINGTON, D.C. | 20590
(d) 202.366.5811 | (e) maya.sarna@dot.gov

Minneapolis Central Library: 300 Nicollet Mall, Minneapolis, MN

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Thanks!

MAYA SARNA

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1200 NEW JERSEY AVENUE SE | WASHINGTON, D.C. | 20590
(d) 202.366.5811 | (e) maya.sarna@dot.gov

Lebold, BillieJo

From: arthur higinbotham <ahiginbotham@msn.com>
Sent: Wednesday, May 27, 2015 2:51 PM
To: swlrt
Cc: jeanette Colby; cwreg w; Stuart A Chazin; George Puzak
Subject: Comments on SWLRT SDEIS

The following are my comments on the SDEIS Executive Summary. I plan to attend and speak at the hearing at Dunwoody on June 18, 2015 at 6 p.m.

The Executive Summary overall fails to give detail on each of the categories in Table ES-1 that is sufficient to make a response to the concerns with co-located freight and light rail in the city of Minneapolis:

Table ES-1 Category	Comment
<p>Acquisitions and Displacements</p> <p>Acquisition of 2.3 full and 29 partial parcels for the supporting</p>	<p>These parcels should have been identified reader; they are difficult to find in the documents</p>
<p>Cultural Resources</p> <p>Preliminary determination of an adverse effect Team has on Grand Rounds Historic District and Kenilworth chosen as the Lagoon finding?</p> <p>Temporary closure of Kenilworth Lagoon closed? What are to and</p>	<p>Why is this preliminary when the Project had two years since co-location was route of choice? What are the details of this</p> <p>What period of time will the lagoon be the options for canoeists and kayakers to move from Lake of the Isles and Cedar Lake?</p>
<p>Temporary closures of one or both lanes of a short west links segment of Cedar Lake Parkway between Xerxes and being Lake St. and Burnham Road Calhoun routes and bring</p>	<p>Cedar Lake Parkway is one of three east-between I394 and 50th St., the others the connection between 36th St. and S. Lake Parkway. Closure will add traffic to these</p>

shore of

France Avenue

businesses or

through

Parks, Recreation.....

Indirect long term impacts to Jorvig Park, Lilac Park, best park

Park Siding Park, Cedar Lake Park, and Lake of the Isles Park less accessible

Visual Quality and Aesthetics

Three of six viewpoints state that there would be a “sub-factually based stantial” level of impact

Potential construction-related visual impacts....including trees is a long term removal of some of existing vegetation collocate freight

trail

Geology and Ground Water

Potential for long term pumping of water from internal LRT operating tunnel to sanitary sewer determined

Water Resources

Permanent filling of 0.5 acres of wetlands must be avoided

New LRT crossing of Kenilworth Channel jungle of 3

water

Noise

them to a standstill. Residents of the eastern Cedar Lake will be required to head west to to access Uptown and West Lake Street cross a two-way Burnham bridge and weave Kenwood.

Minneapolis has been rated as having the system in the nation; making these parks will make our city (and county) poorer.

This is a very nebulous finding and not

Trees make a park. Removal of mature impact on our parks; the decision to and light rail is the worst possible decision for users and residents.

Cost of pumping has not been included in cost. Effect on water table has not been

Area not identified; any loss of wetlands

This additional crossing will create a concrete crossings (trail, LRT and freight) with potential of contamination

67 moderate and 3 severe noise impacts the corridor tunnel, heavily when both

Vibration

54 ground-borne noise impacts experience

Hazardous and Contaminated Materials

Potential need for ground water pumping behind and extracting tunnel walls

Economic Effects

Potential reduction in property tax revenues Prairie but already

Potential short-term effects on freight rail operations tracks 47 feet bridge over costs and reduce derailments.

Parking Kenilworth

Freight Rail

LRT/Freight Rail Swap increase

When freight and trains pass anywhere in noise will be excessive. At the portal entry to the noise will be amplified. Trail users will be most affected because of proximity to freight and LRT are at grade.

Residents on both sides of the tunnel will loss of sleep, among other annoyances

Pumping can result in drop in water table contaminants from surrounding subsoil

Losses shown for St. Louis Park and Eden not for Minneapolis. Expensive homes are losing value along Kenilworth corridor.

Temporary relocation of the freight rail to the west while constructing the new LRT the channel will increase operating operating speeds to avoid

Loss of parking spaces not applicable to corridor.

This swap will affect freight rail operations and T&CW operating costs.

Temporary movement of freight rail tracks during operations. The Kenilworth tunnel construction whether the freight way. Bicycle and Pedestrian

Temporary trail detours during construction disrupting the route for the

Safety and Security

Emergency vehicle delays of 50 seconds 12 Kenwood. times an hour at 3 new LRT grade crossings of

Environmental Justice preserved.

Arthur E. Higinbotham
Property Owner at 3431 St. Louis Av.
612-226-3025

This movement will disrupt freight rail tunnel construction raises the issues of rail might collapse into the tunnel if the wall gives

Bikers will be detoured for up to two years, continuity of the Grand Rounds. No safe detour trail has been identified.

One of these crossings will be at 21st St. in

No mention is made of the effect on the safety trail and park users.

No specifics are give for assuming justice is

Lebold, BillieJo

From: Smith, Steve E <Steve.E.Smith@HealthPartners.Com>
Sent: Friday, May 29, 2015 1:23 PM
To: swlrt
Subject: stop the SWLR project

Please save the taxpayers 2 billion dollars and invest the money in other modes of transportation (rapid bus plans, etc.).

Please stop the SWLR project

Steve Smith
6824 Jeremy Ct
Eden Prairie, MN 55346

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Kadence Hampton

From: Pat Mulqueeny <pat.mulqueeny@epchamber.org>
Sent: Monday, June 08, 2015 1:02 PM
To: swlrt
Subject: Latest SWLRT budget numbers

I am writing to request the latest projections on costs for the project and specifically the breakdown of cost savings being discussed. Can I have those e-mailed to me?

If you have any questions, please feel free to call me at 952-944-2830.

Thank you for your help.

Pat MulQueeney, IOM
President
Eden Prairie Chamber of Commerce
(952) 944-2830

Get involved with the Chamber! Go to epchamber.org for program and event details – we want to see you at one of our 120+ programs and events this year!



FOLLOW THE EDEN PRAIRIE CHAMBER ON SOCIAL MEDIA!



Lebold, BillieJo

From: Richard Adair <adair001@umn.edu>
Sent: Wednesday, June 10, 2015 4:32 PM
To: swlrt
Subject: Penn Av station

1) Could residents of Bryn Mawr use the Van White station instead of Penn?

I timed the walk from downtown Bryn Mawr (Cuppa Java) to the location of both stations, walking along the route of the proposed new bridge connecting Bryn Mawr Meadows with Van White: 8 minutes to Penn and 14 minutes to Van White. The walk to Van White was mostly in a large park that is not well lit at night; the eastern portion is adjacent to a wooded area with homeless camps. I can't imagine doing this after dark.

Conclusion: few walkers from Bryn Mawr would use the Van White station.

2) The industrial land south of I-394 and north of the bluff leading down to the Penn Av station is a perfect location for a "transit village", with great views of downtown.

Since ridership and development density are major goals, I think it's important to keep the Penn Avenue station.

Richard Adair
Bryn Mawr

Lebold, BillieJo

From: Jim Herbert <JHerbert@barr.com>
Sent: Wednesday, June 10, 2015 6:00 PM
To: swlrt
Cc: 'Laura Jester' (laura.jester@keystonewaters.com); Karen Chandler
Subject: SWLRT SDEIS comment period extended to July 21

On behalf of the Bassett Creek Watershed Management Commission (BCWMC), thank you for the opportunity to comment on the SWLRT SDEIS. The BCWMC is in the process of preparing its updated Watershed Management Plan (Plan) that should be adopted by September 2015. The BCWMC staff has met with SWLRT Project staff regarding the Penn Avenue Station and the segment of the SWLRT project located in the Bassett Creek Watershed. During our meeting we discussed the new policies and development requirements in the Plan and understand the project will be constructed in accordance to the policies of the updated Bassett Creek Watershed Management Plan. Please contact us regarding any questions.

Jim Herbert, PE
Barr Engineering Co.
Engineers for the BCWMC

Jim Herbert, PE

Vice President
Senior Civil Engineer
Minneapolis office: 952.832.2784
cell: 612.834.1060
jherbert@barr.com
www.barr.com

resourceful. naturally.



Kadence Hampton

From: Roger Clarke <rclarkelaw@gmail.com>
Sent: Wednesday, June 17, 2015 10:42 PM
To: swlrt
Subject: Penn Ave Station on SWLRT

Dear Madam and Sir:

We want the Metropolitan Council to select Penn Ave Station at I394 as a transit site on the SWLRT. I have used the bus and bike to travel downtown and back for 35+ year, 20 years of which were made from my Bryn Mawr home at 424 Sheridan Ave. S and the remainder from North Minneapolis. Statistically, there have been fewer people over age 65 living in Bryn Mawr. With fewer transit options, our older citizens must move to more transit accessible residences. If the Penn BRT connected the Penn Station with the Bottineau LRT, then Bryn Mawr Residents would be further connected to retail and services north and west of Minneapolis. Moreover, transit dependent riders from the North side could seek jobs and services south and west of Minneapolis via the Penn Ave. Station. The Penn Ave station increases transit possibilities for elderly and disadvantaged peoples. If fewer park and ride ramps would be built, then we could afford the Penn Ave Station. Those who drive to park and ride ramps already have one mode of transportation. Building the Penn Ave Station for persons who are transit dependent increases the equity of the transit system. The Penn Ave Station should be chosen.

Roger Clarke
rclarkelaw@gmail.com
612-232-7605

Kadence Hampton

From: Karen Lee Rosar <karen.rosar@comcast.net>
Sent: Thursday, June 18, 2015 9:39 AM
To: swlrt
Subject: Comments on the Supplemental Draft EIS

Greetings

I support the Supplemental Draft EIS. There are many of us, including myself, that depend on public transit and the planned metropolitan build out of the LRT and BRT networks for our entire transportation needs. Please proceed without any further delay! The need is now.

Thank you,

Karen Lee Rosar

111 4th Ave N #103
Mpls., MN 55401
612-220-5390
karen.rosar@comcast.net

Kadence Hampton

From: Matthew Pawlowski <matthew_pawlowski@yahoo.com>
Sent: Friday, June 19, 2015 7:41 PM
To: swlrt
Subject: opposition to SW Metro Rail

SW Metro Rail Transit,

I would like to voice my strong opposition to the SWLRT. The project is over 2 billion dollars and keeps rising. The Twin Cities metro plain and simple does not have the population and or population density to justify these dollars being spent. Buses and bus lanes are still the most effective dollars spent in our metro area.

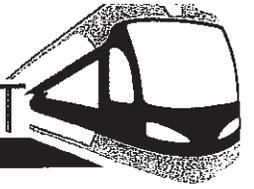
Thank you,
Matthew Pawlowski
952-221-0819

Comment Card

HP-01

Comment #32

SOUTHWEST
Green Line LRT Extension



Date 6-16-15

Comment: I have no comment on Environmental
study. Just how the Southwest LRT
will be built. Thankyou.
David Hester

I am covering the SWLRT story, including the “Minnesota Media Establishment’s” role as de facto participants

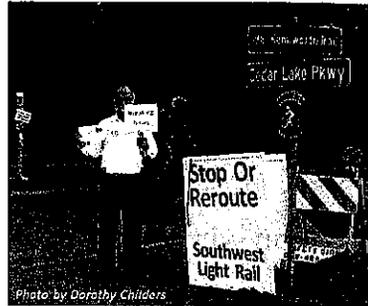
I’m happy to report that on June 16th, **Finance and Commerce** became the first “Establishment” Minnesota media organization to report on the Legislatures action – their article had this headline (finance-commerce.com):

Legislature takes back \$30M for Southwest LRT

This is progress, but the story needs to be widely reported – Minnesotans have a right to know about this.

My web site, www.bobagain.com, has extensive reporting on this story – I invite you to visit it, and don’t hesitate to call or e-mail me. On youtube, my bobagain channel also has several videos.

My own digging shows about \$90 million has been spent on SWLRT so far (way above the \$59 million widely reported). But the real issue is freezing spending on this project. Counties are set to spend \$67.3 million MORE – this year – unless we put the brakes on. Visit my web site for details.



The State cancelled \$30 million of SWLRT funding – even a shortened current alignment cannot be built

As a registered lobbyist for “We the People” (an informal association), I promoted an agreement that is in the 2015 “Lights On” Transportation bill. About \$30 million of the \$37 million 2013 SWLRT appropriation was unspent, and was cancelled. That money was “repurposed” for Metro Council and Metro Transit operating costs.

Without that \$30 million the total State SWLRT appropriation is now about \$15 million. When I asked House Speaker Kurt Daubt at the Special Session if the House might make money available for SWLRT in 2016, he said “no”. The SDEIS says (section 5.2) “... remaining funding is assumed to come from... the State (10 percent)...” The Metro Council’s plan assumes \$1.65 billion will be available. But with \$150 million of State money gone, the money available drops by \$300 million (\$150 million in Federal \$’s is also gone). With \$1.35 billion now available, the current alignment is dead.

better transit bobagain.com

better transit bobagain.com

bobagain

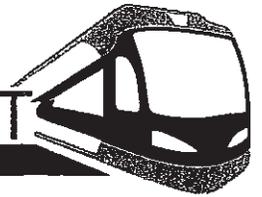
Comment Card

From:
Nancy Arieta

Comment #34

SOUTHWEST

Green Line LRT Extension



Date 6/17/15

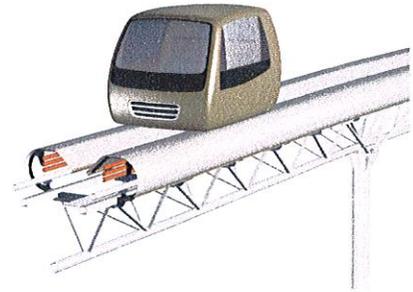
Comment: I am against Light rail in Eden Prairie
my I know a person
who chose not to live in a condo bldg
because light rail ^{is} ~~was~~ right next to
bldg.

See other side

vibration, noise, Traffic Tie ups
accidents, tear ups is permanent on roads
cities
appreciate all your Tax payer paid jobs.
Is no different from streetcars.
Because Fed \$ are available does that
force us to take it?
Our city does well with our
wonderful bus SW Transit.
progress is not always bringing
progress.

PRT Minnesota, Inc.

11330 86th Ave N • Maple Grove MN 55369
612-247-6685 • jlampe@prt-mn.com



21st Century Urban Mobility

June 17, 2015

COPY

Nancy Tyra-Lukens, Mayor
City of Eden Prairie
8080 Mitchell Rd
Eden Prairie, MN 55344

Dear Mayor,

This letter is addressed to you in your capacity as a member of the Southwest LRT Corridor Management Committee. Recent mandated cuts in the cost of the SW line have caught my attention, and last month I began to study the options. I have seen your written comments submitted to the Corridor Management Committee on June 3 and I am very sympathetic to the concerns and problems you raised. I am committed to solving them.

On Sunday June 7 I took a vehicle tour of Eden Prairie to examine the potential for a low cost “range extender system” if SW LRT terminates at the Golden Triangle station, which I am making the case for. Bear with me . . .

A little background -- I am a transit enthusiast. When I lived in Washington DC my mobility was primarily walking and the DC Metro. Daily transit trip share in the Twin Cities is only 3% of the 12 million daily trips by all modes. We can do better. My personal goal for the Twin Cities is 20% transit trip share by 2040.

The more I investigate the SW LRT budget cuts the more interesting it gets. I appreciate that the Corridor Management Committee currently opposes ending the line at Golden Triangle. According to the June 3 staff presentation to the Committee, the cost savings of ending it there would be \$52 to \$59 million more than the cost reduction goal of \$341 million. Additionally, other proposed cost reductions in the LRT line would be unnecessary, thereby gaining allies in the affected cities.

The savings would pay for more than half of a Personal Rapid Transit range extender system beyond the Golden Triangle. Because there would be 12 additional stations over a large area, LRT ridership would increase well beyond the original estimates. This increased ridership will improve the SW project’s Cost Effectiveness Index with the FTA. To achieve high ridership, transit station walk distances should be no more than 1/4 mile. PRT stations are close together, resulting in very short walk distances.

PRT Minnesota can build a 10.7 mile Personal Rapid Transit range extender and local circulator system for about \$10 million per connectivity mile. A conceptual map of such a system is enclosed. I have provided an earlier version of it to Randy Newton in the Public Works Department for staff to discuss.

Enclosed is a short presentation on PRT made last week to the Brooklyn Park Rotary. A collection of PRT videos is at <http://www.prtconsulting.com/prtvendorvideos.html> A video animation is at <http://www.gettherefast.org/bettercampus.html> A pro and con overview is at http://en.wikipedia.org/wiki/Personal_rapid_transit All of these items are on the enclosed DVD.

PRT technology has advanced dramatically in recent years, in great measure because of lessons learned from the deployment of four systems in other countries during the past five years. We have designed a world-class 4th generation PRT technology. Our technology is beyond the research phase, and significant engineering development has been completed. About \$20 million is needed to bring the system to manufacturing and deployment readiness. Engineering innovations from our California-based control system provider and from Ingmar Andreasson in Sweden allow peak traffic period throughput of 14,400 persons per hour, using paired 3-person vehicles at 1.5 sec headways. Ingmar's presentation at the Podcar City 8 conference is available at https://www.youtube.com/watch?v=RI_2YgS9JXg and is on the enclosed DVD. A paper copy of Ingmar's PowerPoint presentation is enclosed.

The partnership of PRT Minnesota and Transit Control Solutions (TCS) has designed a PRT system with 60 MPH speeds and one second intervals between vehicles. Trip times and wait times for the PRT system will be much shorter than trips on current transit systems. Urban travel by PRT will be time and cost competitive with travel by automobile.

The TCS vehicle control system is the world's most advanced Communications Based Train Control, based on their Dynamic Block Control (DBC) technology. The TCS founder, Eugene Nishinaga, has a patent for the DBC technology, with ten more to follow. He had 37 years of employment in the transit industry, most of it with BART, followed by eight years of R&D on PRT and train control technology.

Our physical design and control technology is driving down the cost and vastly increasing the performance of PRT relative to recent systems built in other countries by Ultra, Vectus, 2GetThere and ModuTram. A major reason for skepticism of PRT by public transit agencies is that the Morgantown WV PRT and the newer PRT systems are relatively low speed and low capacity. There are no PRT designs in the US or elsewhere with the advanced functionality that the PRT Minnesota design has. Our guideway and vehicle concepts were greatly influenced by a world famous roller coaster designer.

PRT has been trapped in a loop for decades:

- The customer (such as Eden Prairie) needs a product
- The product development needs an investor (about \$20 million)
- The investor needs a customer

But we are getting close to breaking out of this loop, and Eden Prairie may be part of the solution. The city has the most ideal structure for PRT that we have found in the USA.

Historically PRT has been rejected because of its perceived low speeds and low capacity and the lack of real-world deployments. Our control, vehicle and guideway technologies solve the speed, capacity and cost issues. PRT is a proven technology, with five automated systems now operating in five countries. Driverless automated vehicles are rapidly joining

the transportation world. Rivium in the Netherlands even has a driverless automated bus system, called Park Shuttle, in operation since 2008:

<http://www.advancedtransit.org/advanced-transit/applications/rivium/>

Self-driving vehicles require control technology at least 10X more complex than PRT control, but it is being done and therefore PRT control can be done.

The low capital and operating costs of PRT, coupled with very high capacity and short trip times, means that public agencies can build PRT systems for a fraction of the cost of current transit, while achieving high ridership and reaching deep into low density suburban areas. Fare box revenues can pay the construction or operating costs. Federal government money is not needed.

Because of slow and inconvenient service compared to automobiles, transit in the US carries only 1 to 2 percent of all urban daily trips. Only six US cities have transit trip share above four percent. In our metro area daily trip share is 3%. To have a large share of daily trips, transit has to "go everywhere all the time, with automobile competitive travel time." Buses have large networks, but trip times are too long and rail has too few destinations as well as long trip times.

Transit mode share is determined by walk time, wait time, ride time, transfer time, fare, number of origins and destinations, plus other criteria like health status, age, weather and "can you afford to own and operate a car?" Total trip time is the most important factor. Current transit technology is not automobile competitive, so few people use it unless they absolutely have to. Because current transit is not a workable travel mode for most people, they drive cars. But traffic congestion continues to increase. The number of vehicle miles traveled each year increases much faster than lane miles of roads. Buses can't attract riders and there is not enough money and land to build sufficient roads and urban rail systems.

High performance PRT is the only urban travel mode that can overcome these limitations and problems. It can be built and operated at low cost relative to other modes, and can provide high capacity, large numbers of origin destination pairs and short trip times, thereby attracting riders. It is time to demonstrate these characteristics in an environment where it is complementing rather than competing with rail transit.

The decision process on SW LRT is moving rapidly and I would like to meet with you to discuss a path forward to building a world-class transit system for Eden Prairie that will complement the SW Corridor project.

Sincerely yours.

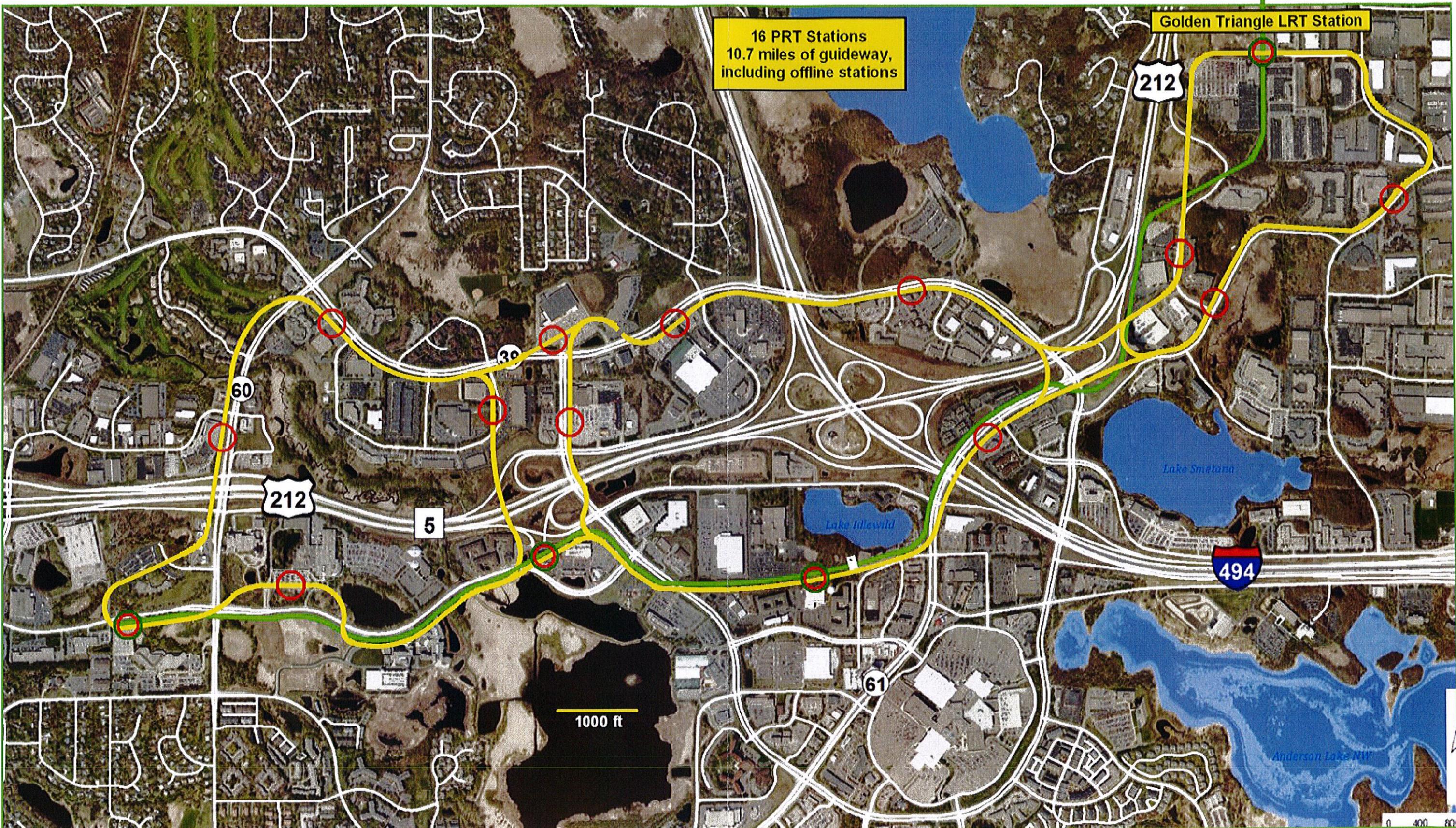


Joseph Lampe, President
PRT Minnesota, Inc.

cc: City Council
Corridor Management Committee

Range Extender for SW LRT

3.6 LRT route miles 9.6 PRT route miles



Appendix

PRT Simplifies Transit Planning, Construction and Operations:

- No vibration or acoustic noise emission.
- No buried cable ducts -- communication links are in the guideway.
- No at-grade street crossings.
- No pilings or retaining walls
- No overhead power catenary.
- No large and expensive traction transformer-rectifier substations.
- No ongoing track and switch maintenance
- No replacement of poorly compacted soils
- No relocation or abandonment of freight rail.
- No “capital maintenance” funding requests to Legislature
- Minimal utility relocations (at Heathrow there were zero).
- Simple 13.8KV 3-phase power feed to 480V transformers.
- Almost no land acquisition required (need only 50-year easements).
- Trivial wetlands impacts and mitigation, thus greatly simplified and less expensive EIS.
- Most of the system can be installed on existing public right-of-way.
- 3-berth stations can have a footprint as small as 19 ft x 38 ft (4 parking stalls)
- Each additional loading berth adds about 9 ft to the length.
- Rapid construction and installation.
- Much smaller OMF building and yards.
- Greatly reduced OMF staffing requirements.
- Extreme flexibility and simplicity of system layout and station locations.
- Near immunity to severe winter weather conditions.
- Complete automation means lower operating costs.
- Curve radii as small as 75 ft.
- Vehicles can climb 10% grade.
- etc.
- etc.
- etc.

A few of the many PRT resources on the Internet:

<http://www.ilsr.org/really-light-rail/>

StarTribune article by David Morris - Institute for Local Self Reliance

<http://gettherefast.org/bettercampus.html> (click on the video icon)

<http://youtube.com/watch?v=B7hgipbl1BK8>

collection of 20 ULTra videos - PRT at Heathrow

<http://www.advancedtransit.org/advanced-transit/applications/rivium/>

driverless automated bus system in the Netherlands

http://www.en.wikipedia.org/wiki/Personal_rapid_transit

pro and con overview (somewhat out-of-date)

<http://hbswk.edu/item/6333.html>

commentary from Harvard Business School

http://faculty.washington.edu/jbs/itrans/planetizen_article.htm

http://faculty.washington.edu/jbs/itrans/big/Goran_shortfalls.pdf

https://www.youtube.com/watch?v=RI_2YgS9JXg

Ingmar Andreasson - PRT as mass transit

<http://www.prtconsulting.com/content.html>

PRT resource site

<http://www.prtconsulting.com/prtvendorvideos.html>

assorted videos of driverless transit systems

<http://faculty.washington.edu/jbs/itrans/burke.htm>

Innovation and Public Policy: The Case of Personal Rapid Transit - book

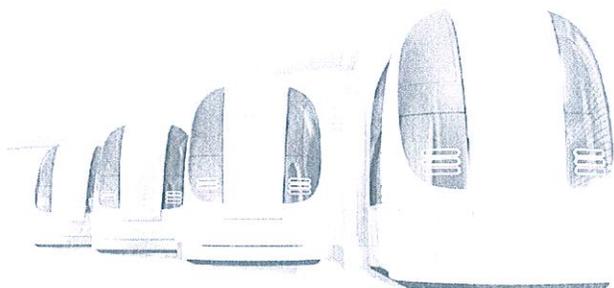
<http://www.open-spaces.com/article-v3n2-bundy.php>

analysis of transit by a Seattle environmentalist

<http://www.containerstory.com>

how the standardized container industry revolutionized shipping
(history lesson on technological innovation)

PERSONAL RAPID TRANSIT (PRT)



Urban Mobility for the 21st Century

June 16, 2015

"The Americans have need of the telephone, but we do not. We have plenty of messenger boys."
- Sir William Preece, Chief Engineer, British Post Office, 1878



"The idea that cavalry will be replaced by these iron coaches is absurd. It is little short of treasonous."
- Comment of Aide-de-camp to Field Marshal Haig,
at tank demonstration, 1916



"How, sir, would you make a ship sail against the wind and currents by lighting a bonfire under her deck?
I pray you, excuse me, I have not the time to listen to such nonsense." - Napoleon Bonaparte, when told of Robert Fulton's steamboat, 1800s



"No one will pay good money to get from Berlin to Potsdam in one hour when he can ride his horse there in one day for free." - King William I of Prussia, on trains, 1864



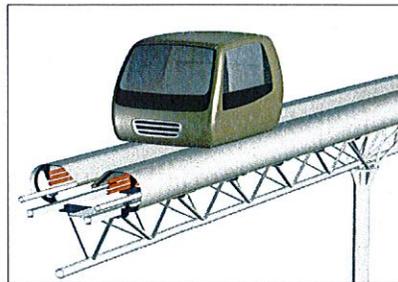
The Problem

- Increasing traffic congestion & travel delays
- Vehicle Miles Traveled increase much faster than Lane Miles Built
- Taxpayers oppose fuel taxes to build more roads
- Current transit is unworkable for most urban trips
- Only six US cities are above 4% transit trip share
- Most US cities are at 1-2% transit trip share

More Problems

- Increasing need for urban mobility without an automobile
- Current bus and rail technology can't improve urban mobility
- 60-year backlog of federal transit funding requests

The Solution is Personal Rapid Transit (*ULtra-Light Rail*)



Morgantown, WV - 1975

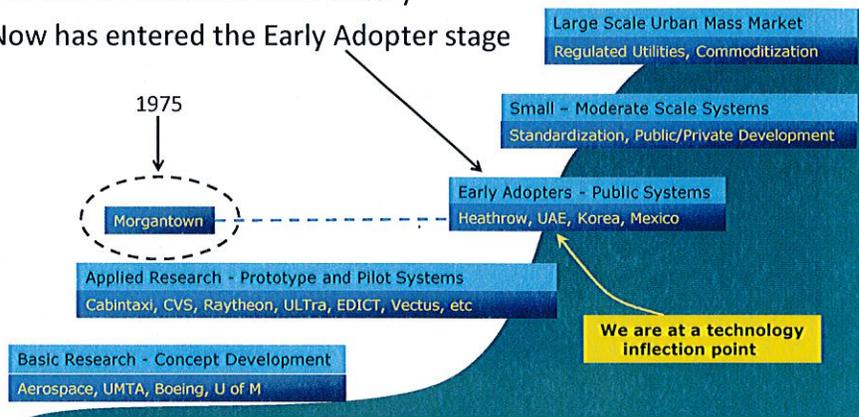
8.7 mile system
20 passenger vehicles
Cost \$130 million

Still operating in 2015
No accidents in 40 years



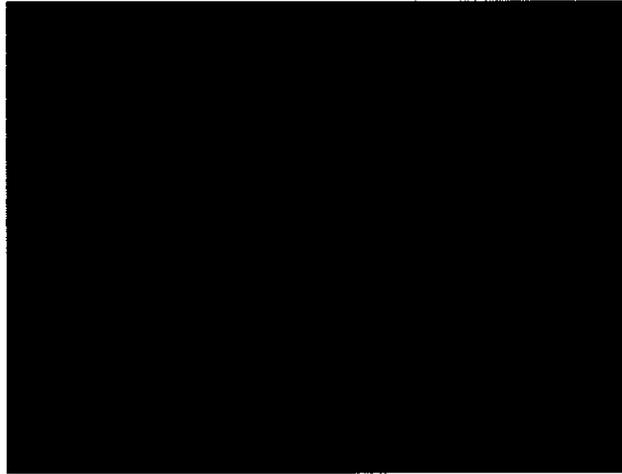
PRT Technology Maturation

PRT has an extended R&D history
Now has entered the Early Adopter stage

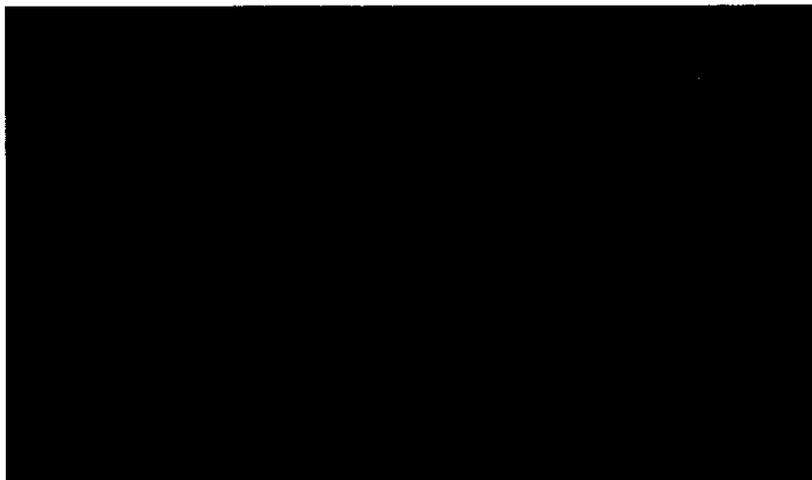


Booz | Allen | Hamilton

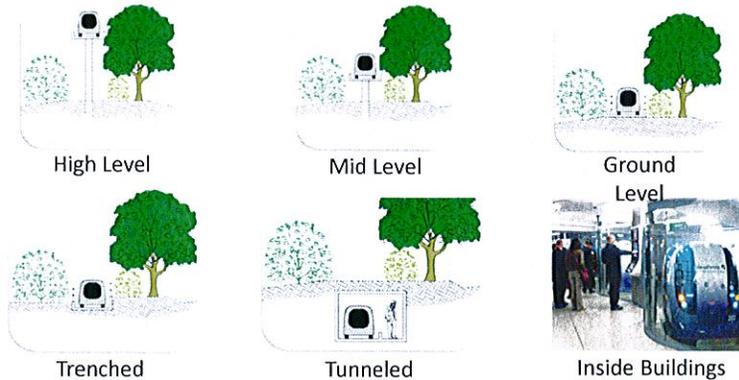
PRT for the Microsoft Campus
(*extending the range of rail transit*)



Recent Automated Transit
(*no sound track*)



PRT Urban Integration



Can be attached to sides of buildings and bridges

Why So Few Transit Riders?

- Rail and buses have long trip times
- Rail has very few stations
- Rail is very expensive and intrusive, so large networks cannot be built
- Transit is inconvenient for most urban trips
 - *walk time, wait time, trip time, transfers, weather*

Why PRT Has High Ridership

- Many stations, closely spaced
- Short trip times, travel up to 60 MPH
- The high capacity of rail transit
- Private, safe, secure and seated ride
- On-demand service, no waiting at stations
- Trips are direct to destination, no stops or transfers
- All weather, available 24x7, handicapped accessible
- Efficiently serves lower population density areas

Cost/Benefit Analysis

- PRT has Low Capital Costs:
about 10% of LRT per connectivity mile
- PRT has Low Operating Costs:
50% of LRT and bus transit
- The PRT MN design has High Capacity
and Short Trip Times
- Life-Cycle Cost per passenger mile is low

Benefits to Communities

- Flexible, non-intrusive design
- Simple route planning and urban integration
- Network and corridor layouts are feasible
- Energy efficient – equivalent to 80 MPG auto
- Able to climb and descend 10% grades
- No need for Federal transit funding
- Reduced transit operating subsidies

Benefits to Transit Agencies and Government

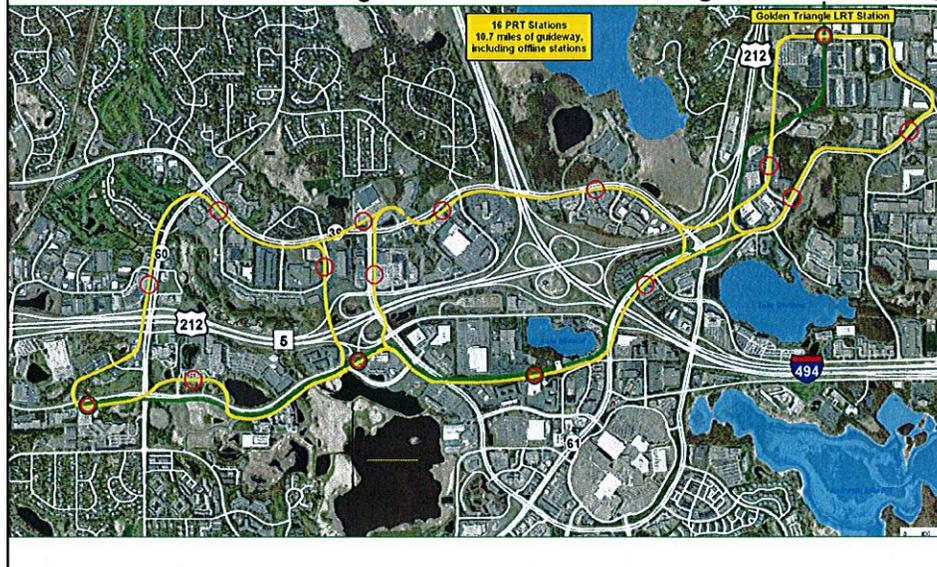
- Increased transit accessibility and use
- Reduced need for road expansion
- Low construction costs
- Low operating costs
- No need for federal funding to build systems

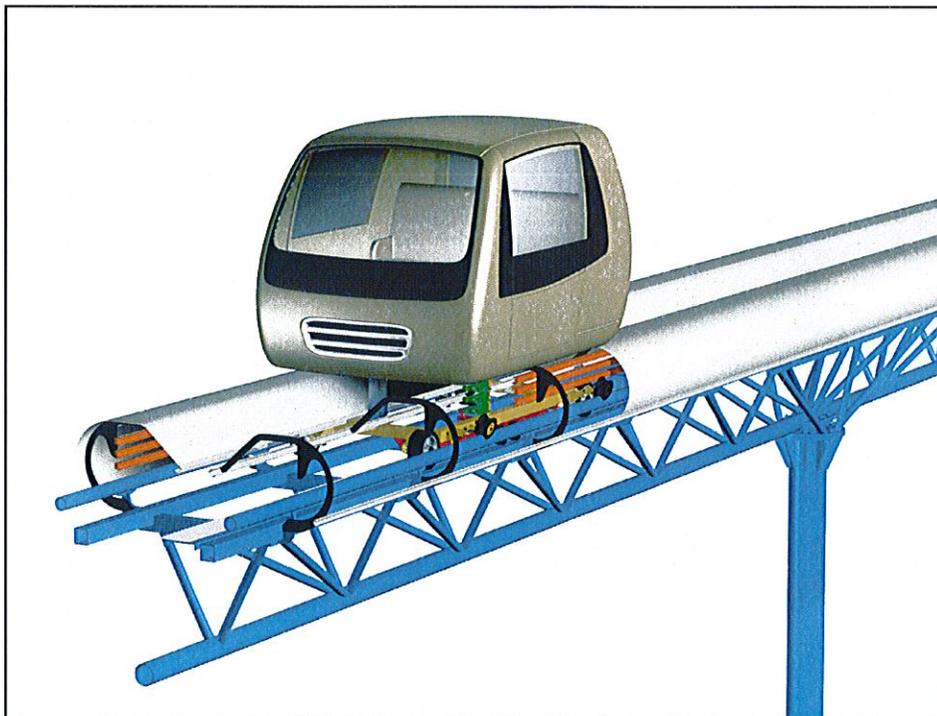
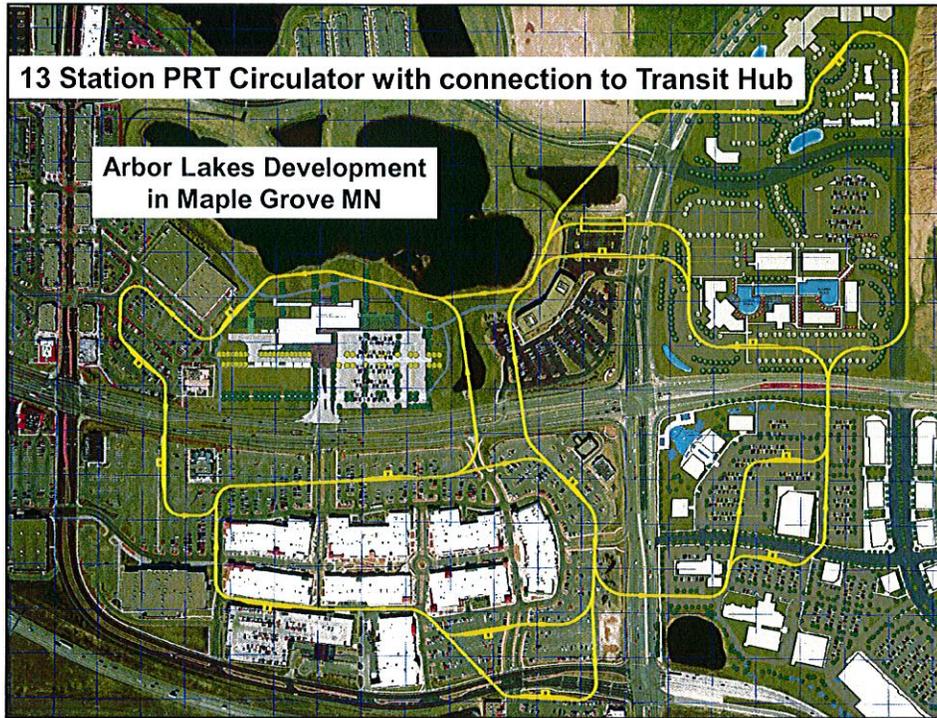
Data from Minneapolis/St. Paul

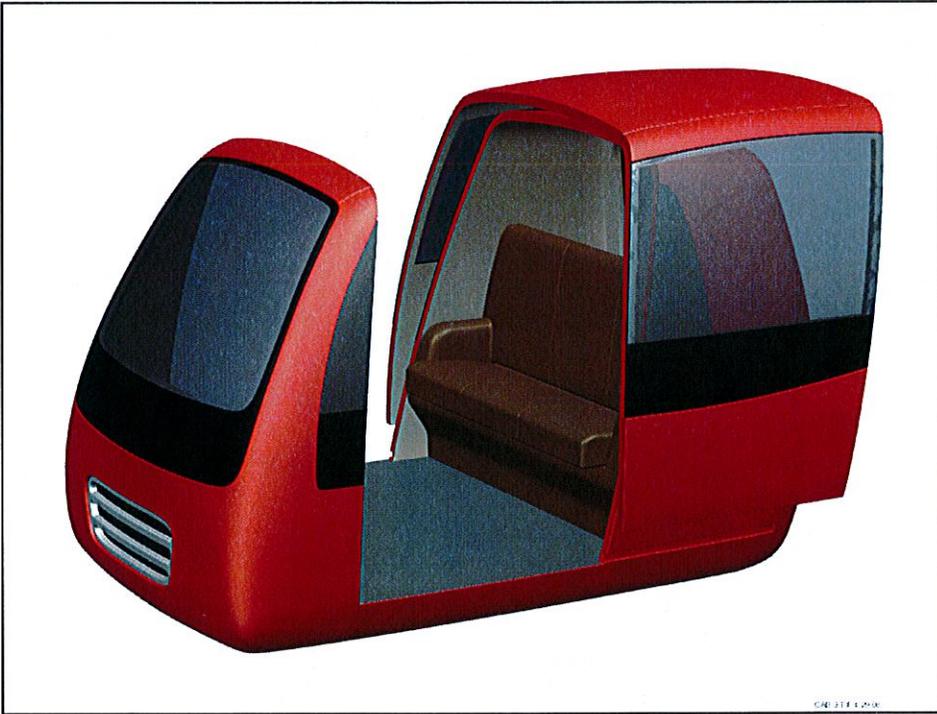
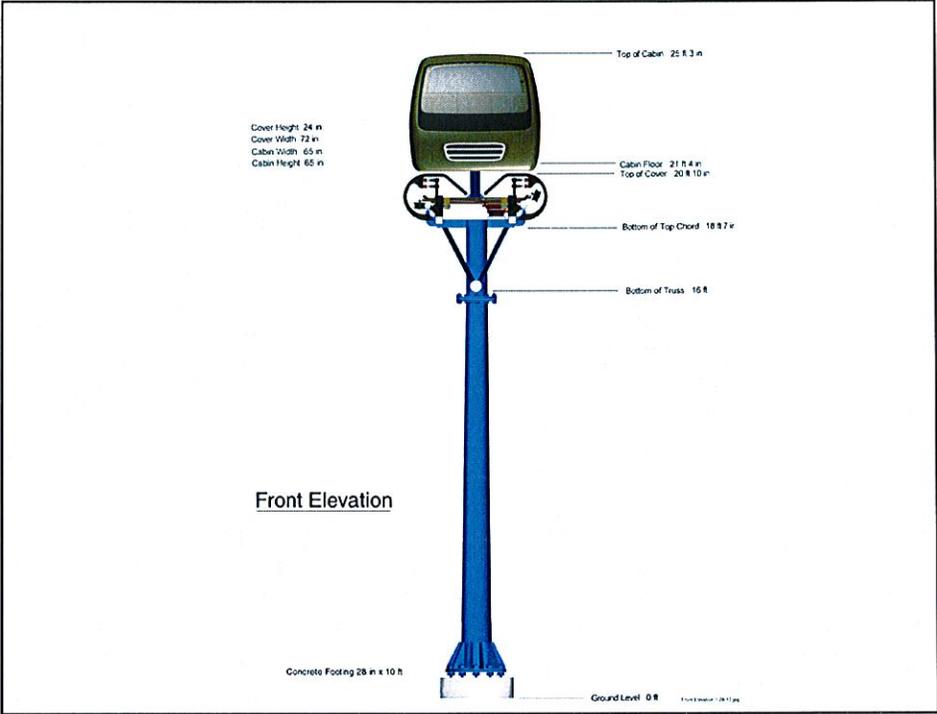
- Five LRT lines will cost \$6 billion, but in 2030 they will provide only 1.3% of all daily trips
- In 2030 buses will provide only 3% of all daily trips in Minneapolis/St. Paul
- 100% of public transit capital costs and 70% of operating costs are financed by taxes

PRT for Eden Prairie

Range Extender for SW LRT





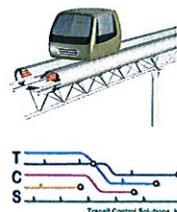


Target Markets and Customers

- Public transit agencies ultimately will be the largest purchasers
- 250 US cities that cannot afford to build conventional rail transit
- Collector/distributor for rail stations
- Corporate campuses
- Amusement parks
- Shopping districts
- **Global market is 10 X larger than US market**

Contact Information

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From personal to mass transit

Prof. em. Ingmar Andreasson

ingmar@logistikcentrum.se

40 years in transportation

- Transit network planning - VIPS
- Taxi fleet management - Taxi80
- Multi-discipline PRT research - Chalmers
- Road traffic research – KTH
- 5 PRT patents
- VP, Advanced Transit Association

Storyline

- A challenging podcar application
- Five strategies to cope with large demand
- => Mass transit with podcars

The challenge

- Dense urban area in California
- Very large employers
- Severe highway congestion
- Promote non-car modes
- Transfers from Train and LRT
- Connecting buildings (horizontal elevator)

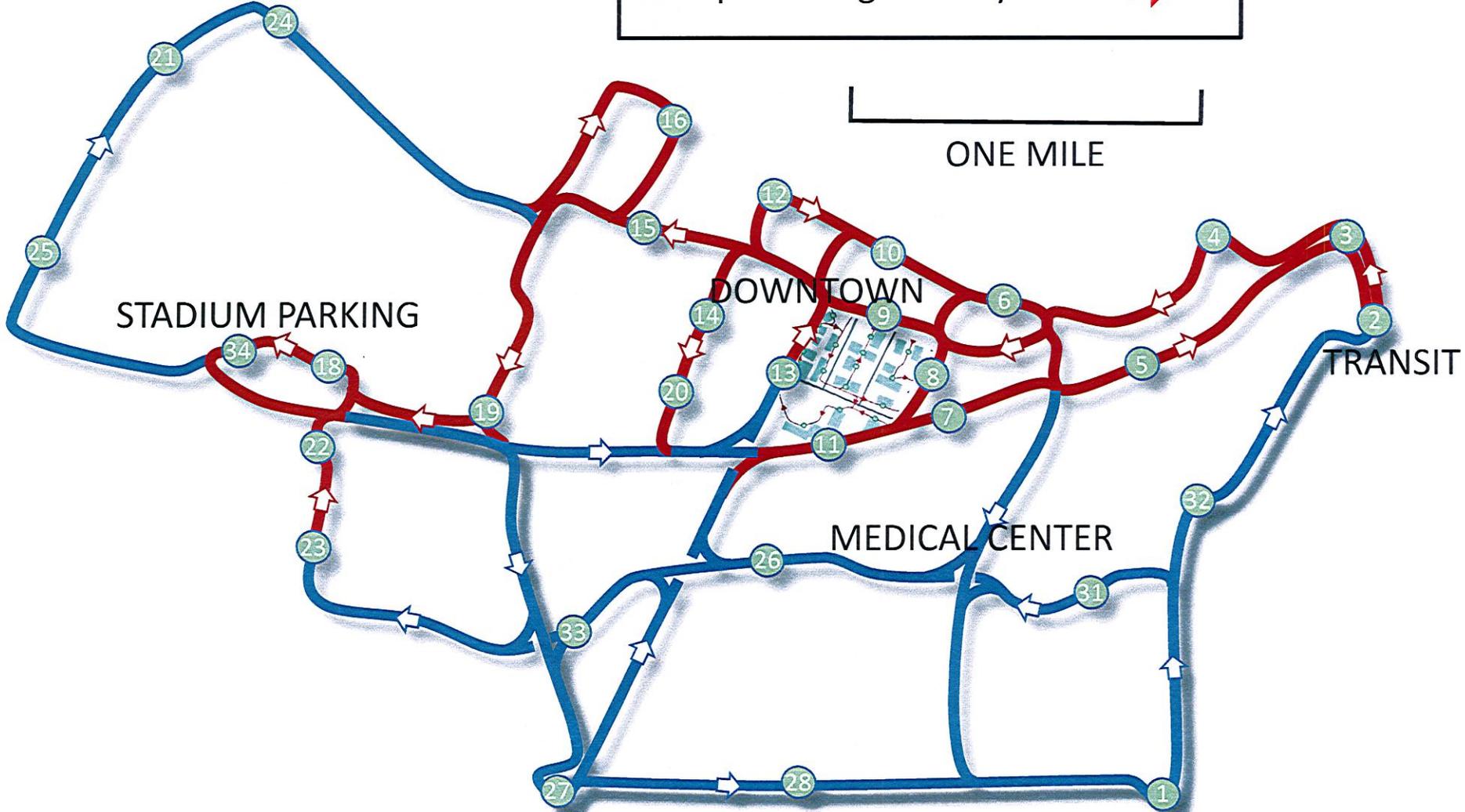
Contract with PRTCconsulting

Legend

Station	
28 mph main guideway	
22 mph main guideway	



ONE MILE



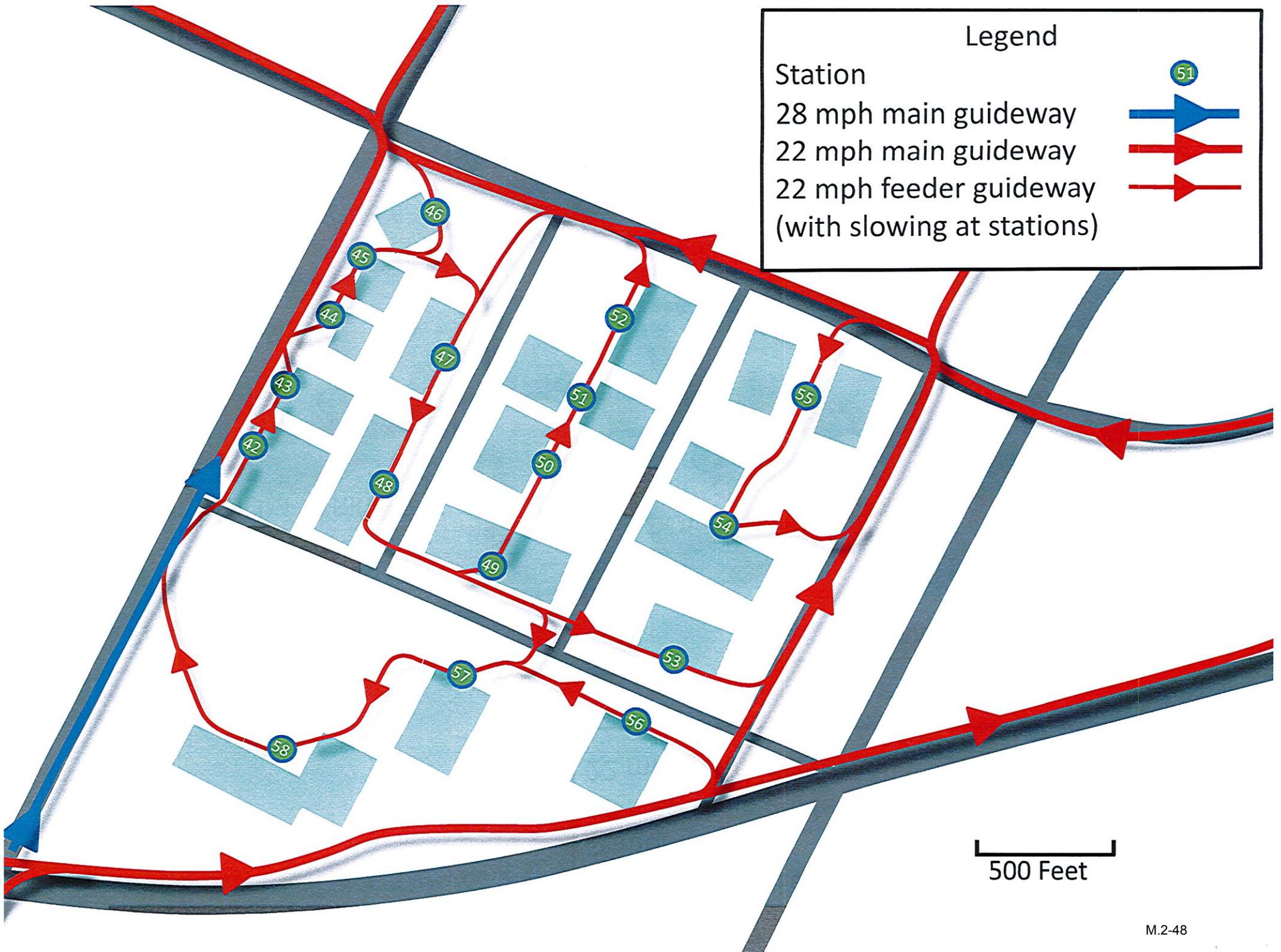
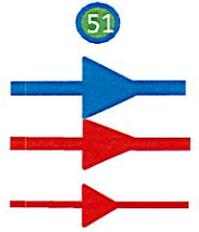
Legend

Station

28 mph main guideway

22 mph main guideway

22 mph feeder guideway
(with slowing at stations)



500 Feet

Our tentative design

- 50 stations
- 48 kms main guideway (6 % double)
- 4 bi-level intersections out of 54
- Speeds 36 and 45 kph
- Headway 3 secs (as certified)
- 900 vehicles with 6-seats

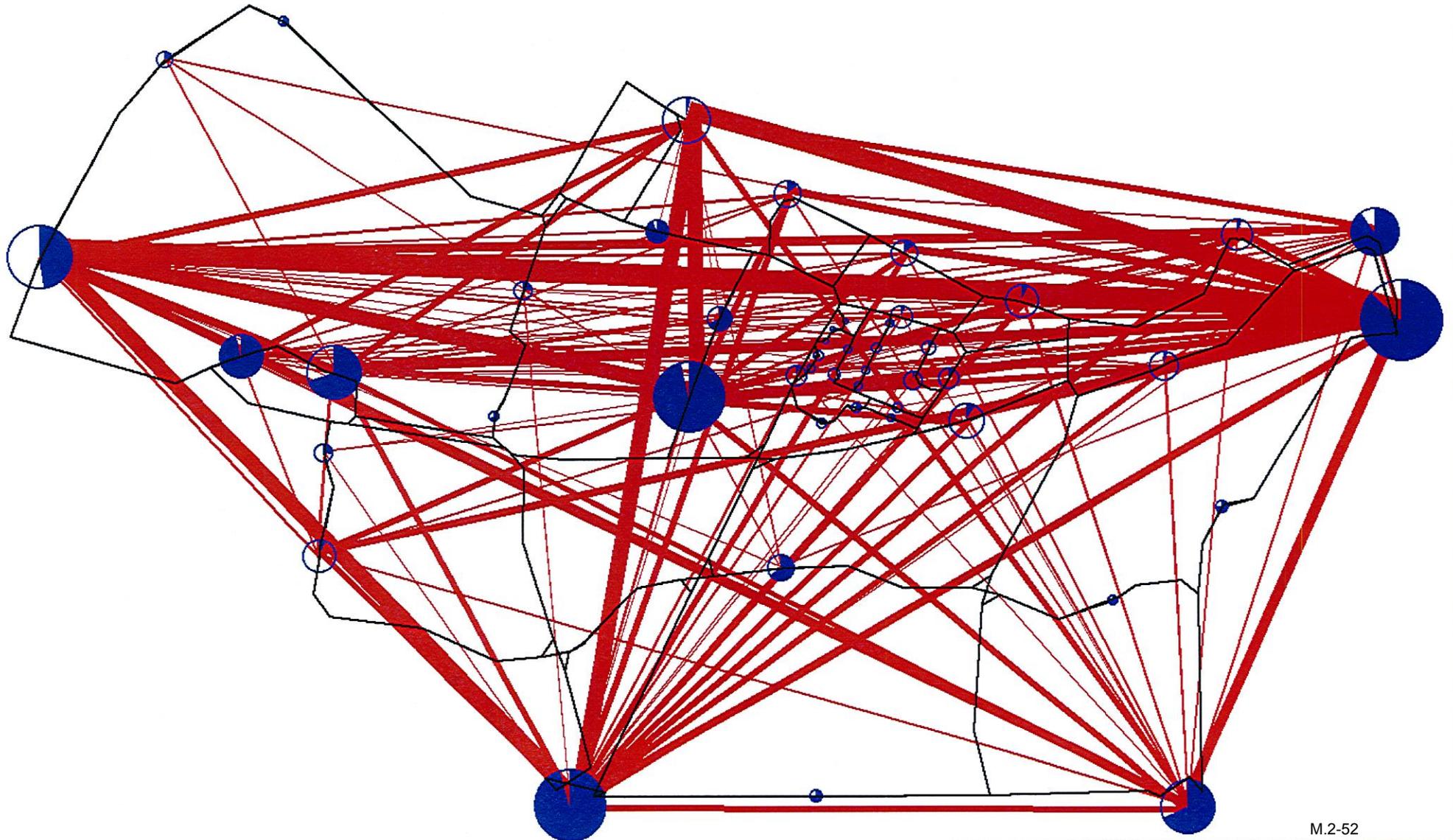
Morning peak hour demand

- 13 000 passengers
- 30 % of trips from 3 transfer stations
- 400 passengers from one train
- Many dispersed destinations

Train / PRT station



Morning peak demand 13 000 / h



Personal Rapid Transit

- Average 1.5 passengers per vehicle
- Can carry 4 800 passengers
- 24 mins waiting

Ride-matching at departure

- System knows requested destinations
- First passenger determines destination
- Destination sign over vehicle
- System assigns vehicle when enough load (5 of 6)
- ...or after max holding (1 min)

Ride-sharing morning

- In relations with >1 party per minute
- 7 % of relations have 60 % of all trips
- 48 % of passengers matched
- Average load 3.9 passengers
- 11 400 passengers carried
- 11 minutes waiting

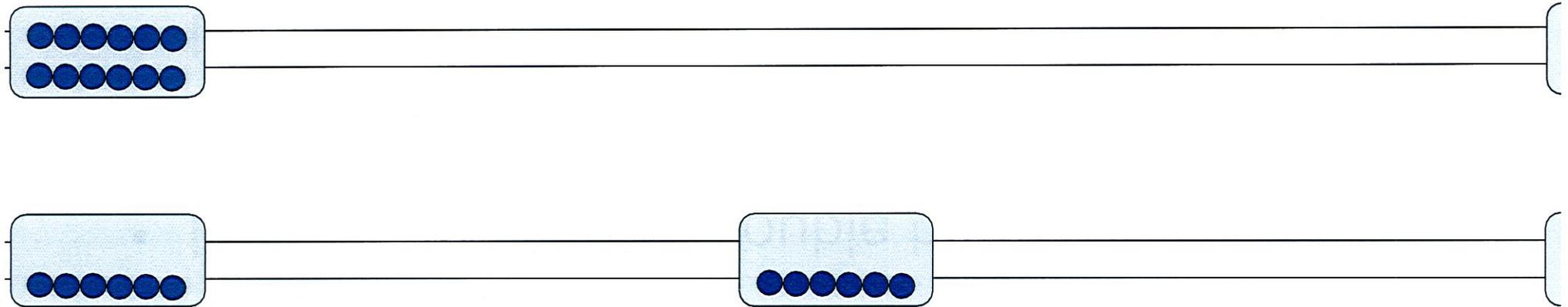
Evening peak most challenging

- Many small origins
- Less opportunities for matching
- 43 % of passengers matched (48)
- 10 800 passengers carried (11 400)

Standing passengers?

- Vehicle for 6 seated + 6 standing
- Limited braking => double headway
- Same capacity
- Longer station ramps

Same capacity without standees



Coupled vehicles

- Coupled in station
- Decouple in switches to different destinations
- Safe distance between couples
- 2 x line capacity at departure
- Average 1.5 en route

Vehicle pair can safely split apart

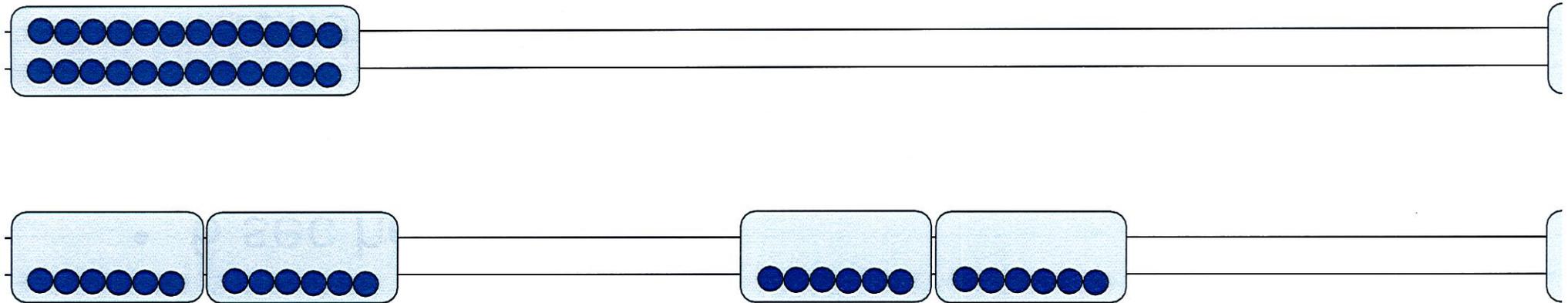


- Can serve different destinations
- More load with two destinations
- Each vehicle goes non-stop

Larger vehicle?

- 24 passengers including standees
- 6 sec headway
- Couple 2 x 6 seated has same capacity
- ...and can split up en route

Coupled vehicles better than big



- Can serve 4 destinations

Electronic or mechanical coupling



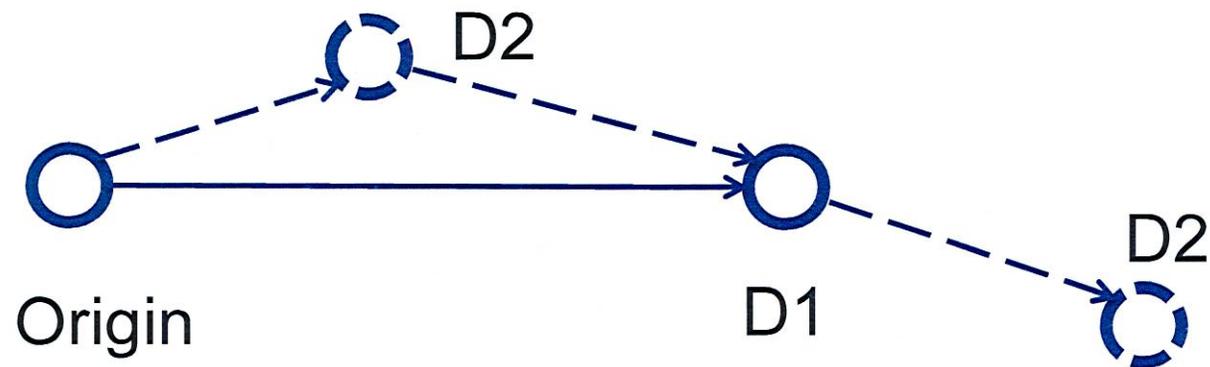
Ride-sharing plus coupling

- 13 200 passengers carried evening (10 800)
- 5 mins waiting (11)
- Better – but still too much waiting

Sharing to 2 destinations

- 26 % of departures for 2 destinations
- 58 % of passengers matched (48)
- 13 300 passengers carried
- 3.5 mins waiting (5)

Second destination before or after



- Detours within 20 %

Allow boarding to same destination

- When stopped to drop off
- Waiting passengers to same destination
- Destination sign over vehicle
- No reason not to allow boarding

Ride-sharing patterns



Same O & same D



Two destinations

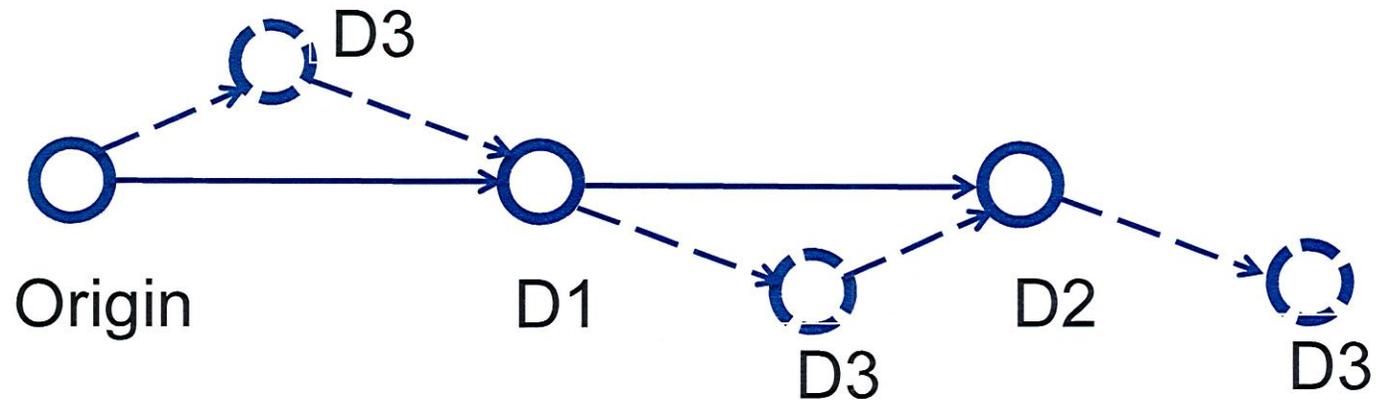


Allow boarding

Sharing to 3 destinations

- 59 % of passengers matched
- 1.2 destinations average
- 13 400 passengers carried
- 3.3 mins waiting (3.5)

Adding a third destination

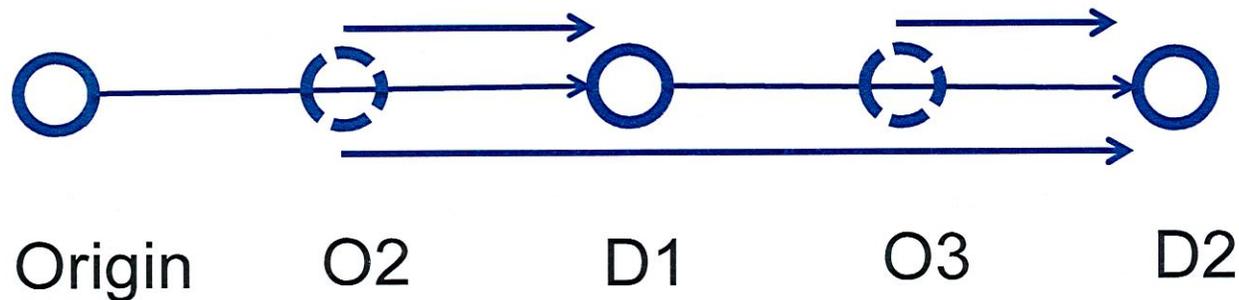


- Before, between or after

Matching many-to-few

- Evening demands more difficult to match
- Multiple pick-ups to common destination (transfer)
- First passengers determine destinations and route
- Stopping en route to pick up for same destinations

Stop en route to pick up



- Route fixed to one or two destinations
- Check waiting passengers en route
- Pick up for same destinations
- No passenger makes more than two extra stops

Stop to pick up

- Picking up 2 000 passengers out of 13 400
- 0.3 intermediate stops per passenger
- 4.5 passengers per vehicle (3.9)
- All vehicles full (6) on max link
- 2.9 mins wait (3.1)
- +10 % ride time

Ride-sharing patterns



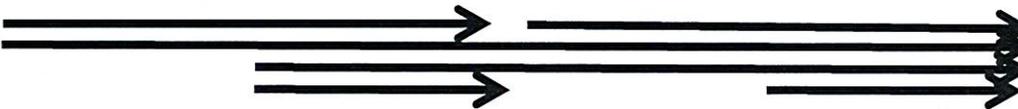
Same origin & destin



Two destinations

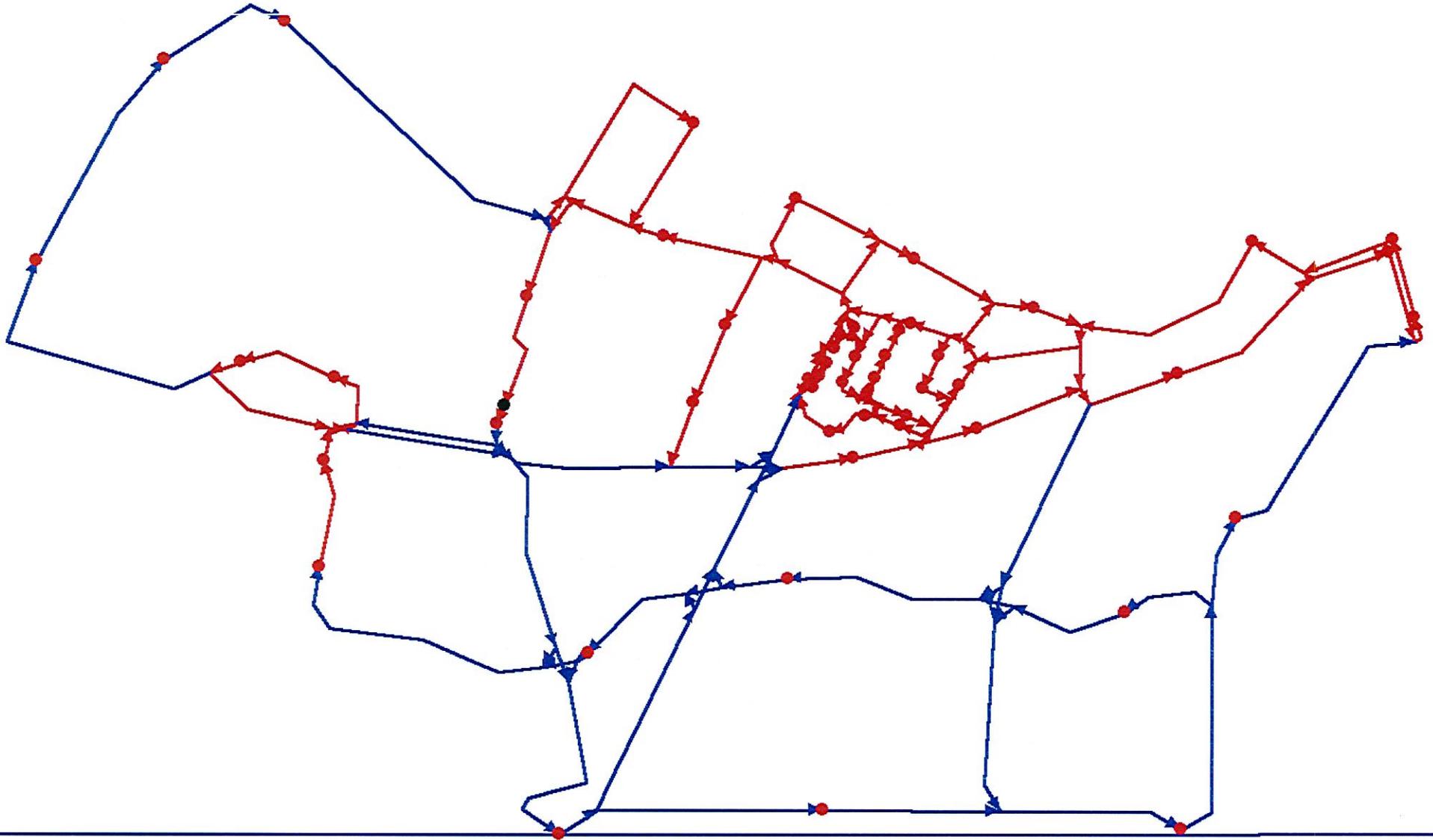


Allow boarding



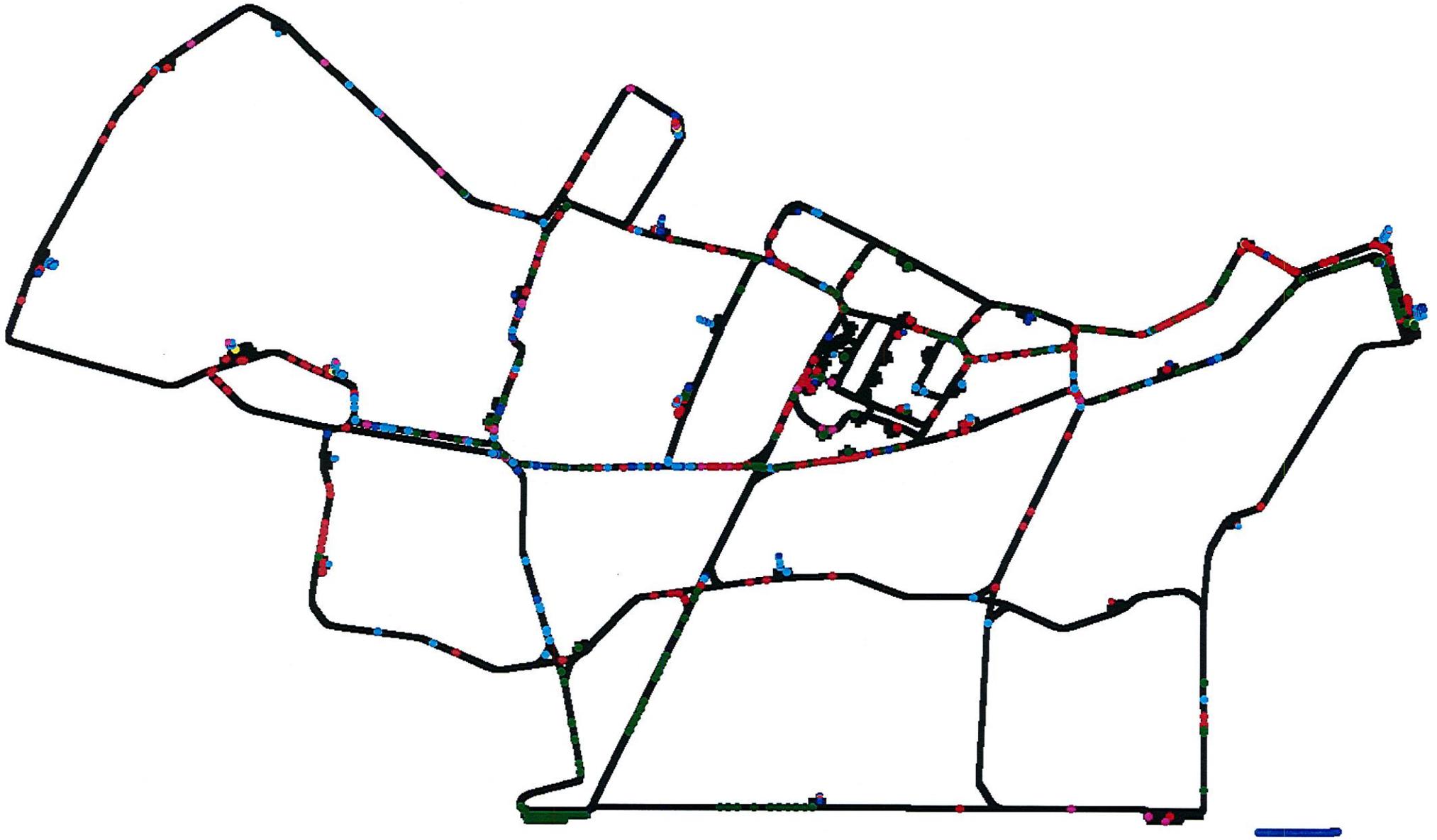
Stop to pick en route

Network high/low speed + train

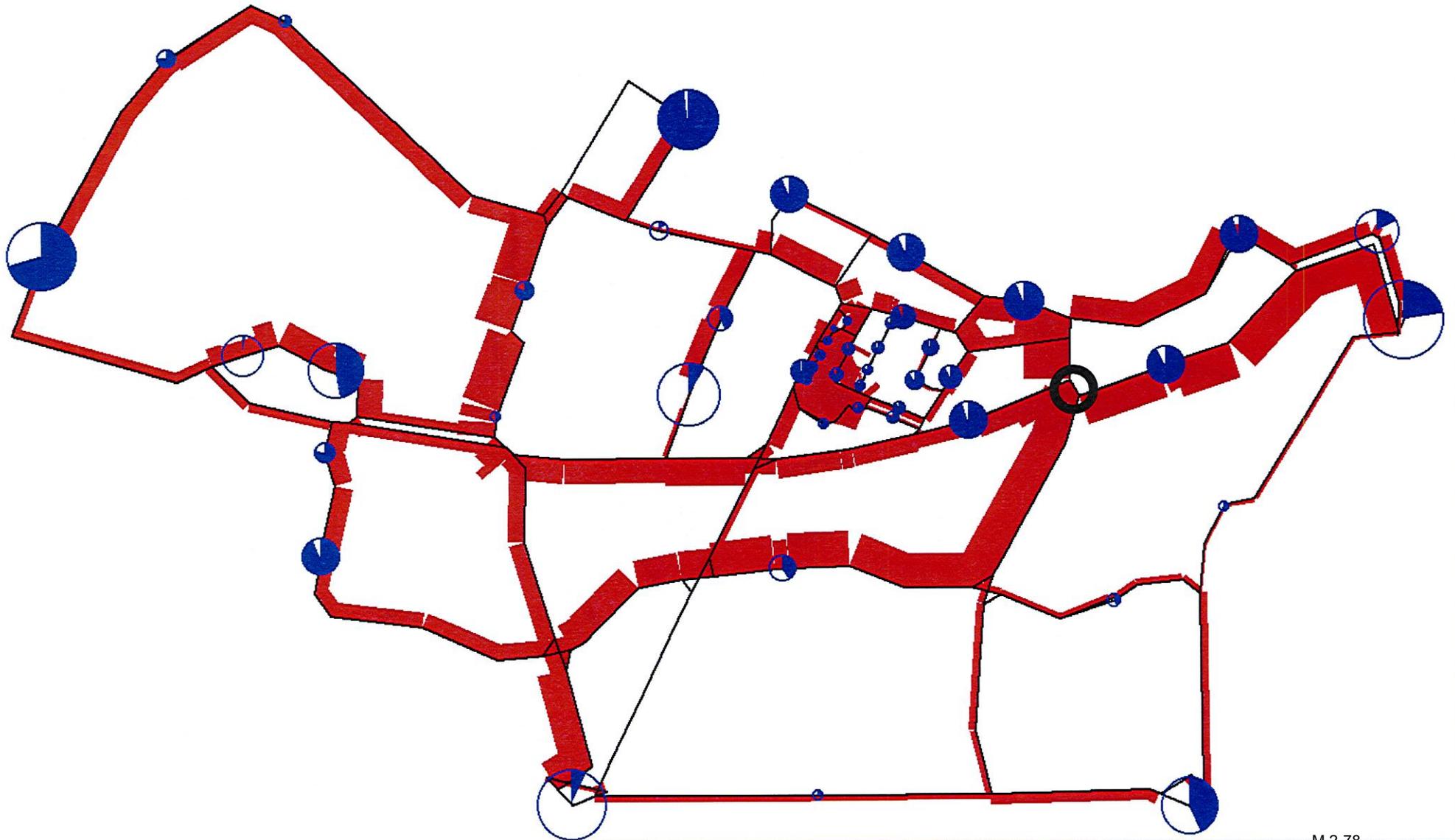


Animation 10 x real speed

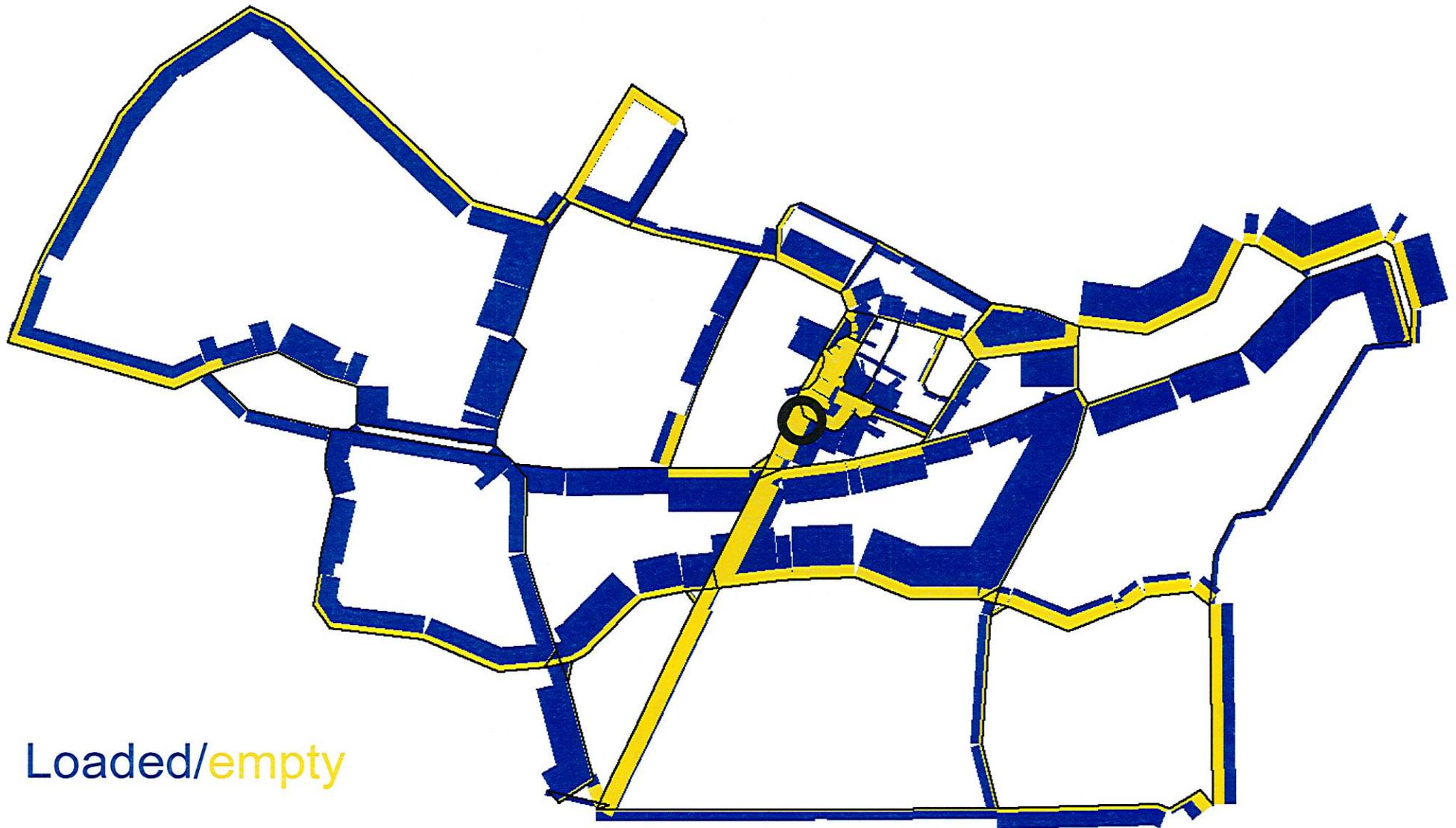
-  Empty vehicle
-  1 passenger
-  2
-  3
-  4 or more
-  Load/unload
-  Couple



13 400 trips evening peak (6 000 link)

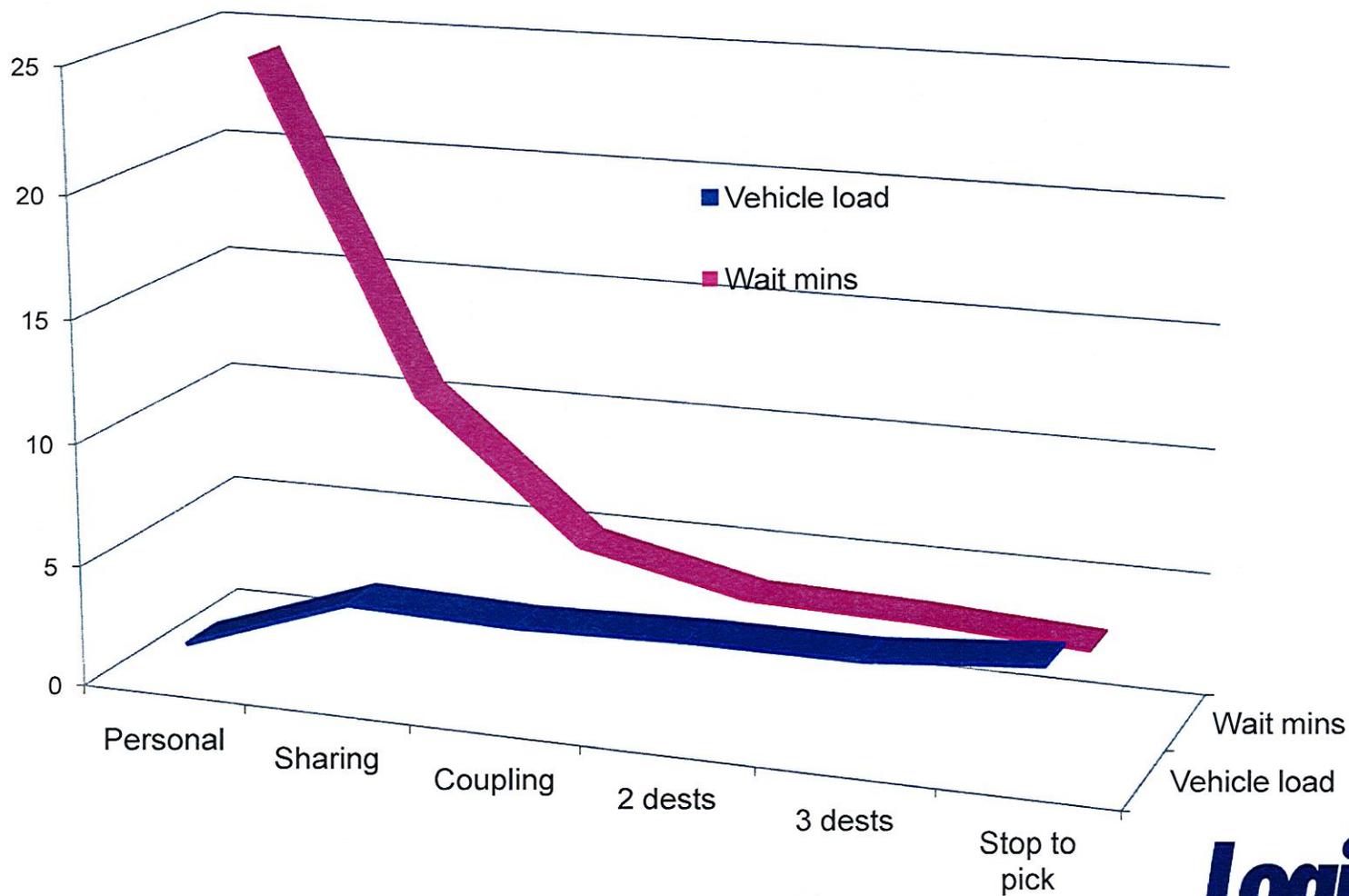


910 vehicles (1800 vph on link)



Loaded/empty

Less waiting with more ride-sharing



All strategies combined

- Up to 1 800 vph on link (average coupling 1.5)
- Up to 6 passengers per vehicle
- Up to 6 000 pph on link, 13 400 in network
- 85 % of vehicles running with passengers
- 8 % running empty
- 7 % in stations

APM for same capacity

- Stopping on-line => double travel time
- Can only serve 30 out of 50 stations
- Minimum headway 90 secs (40 deps/h)
- To achieve link flow 6 000 pphpd
- Needs to load $6000 / 40 = 150$ passengers

APM or LRT



$200 \text{ pass} / 90 \text{ sec} * 75 \% \text{ load} = 6\,000 \text{ pph corridor}$

PRT



$6+6 \text{ pass} / 3 \text{ sec} = 14\,400 \text{ pph (all paired \& full)}$

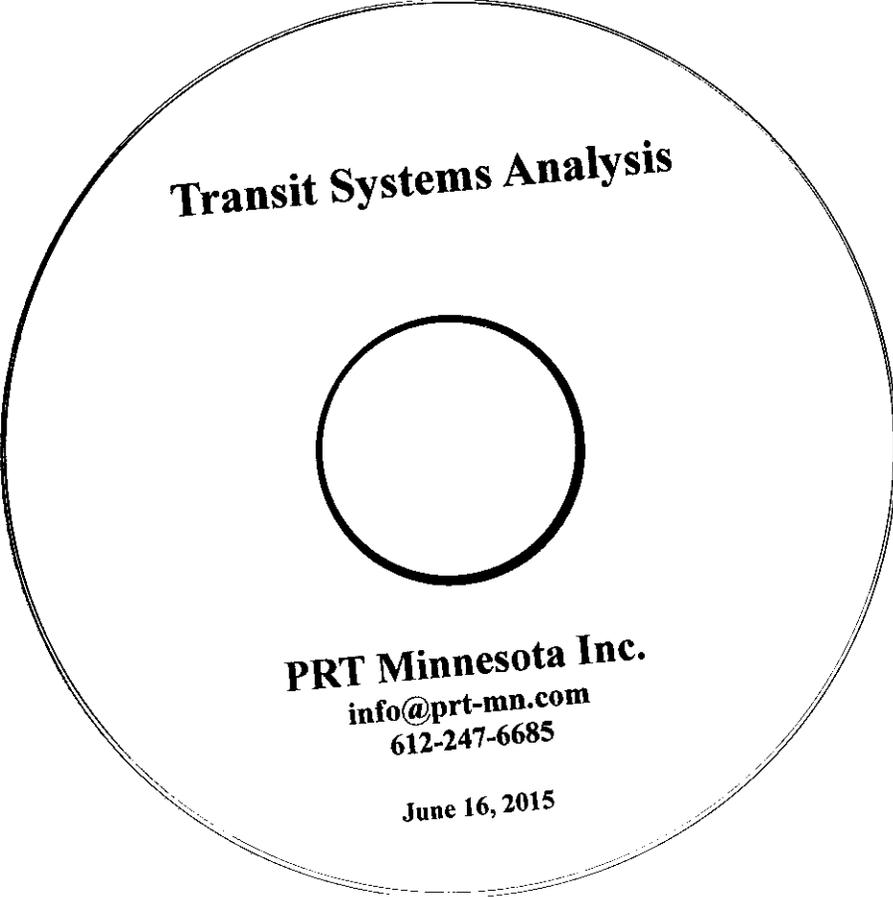
Case 6 000 on link, 13 400 in network

Conclusions

- Apply ride-sharing and pick-ups during peaks
- On demand, almost non-stop (0.3 extra stops)
- Slightly longer trips (+10 %)
- Can handle mass transit flow
 - 6 000 pph on link, 13 000 in network
- Not always Personal, but very Efficient
- Mass Rapid Transit, but faster & cheaper

PRT Minnesota Inc
11330 86th Ave N
Maple Grove MN 55369

SDEIS ~~Submission~~ submission



Transit Systems Analysis

PRT Minnesota Inc.
info@prt-mn.com
612-247-6685

June 16, 2015

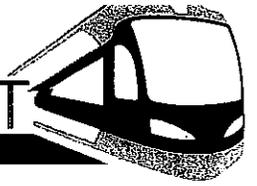
Comment Card

MP-01

Comment #36

SOUTHWEST

Green Line LRT Extension



Date 6/18/15

Comment: one last piece -

I moved to Minneapolis 30 months ago. A SWLRT planning meeting was my first civic meeting. I was so excited to be asked about planning. Sigh. Nave

This "process" has been such a ~~s~~ disappointment.

I have lost any ^{& all} trust in Met Council. Lies upon

Lies upon Lies. EP Riders / Equity train - all gone -

Need I say more - but there is more.

Be Honest about what you are doing. you are

not saving the environment. You are not getting

people to jobs. Be honest about what you are

doing & who is paying you what to do it.

That's called transparency in government.

Met Council may make me vote Republican - Sigh.

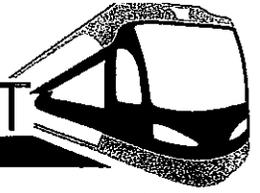
Comment Card

MP-02

Comment #37

SOUTHWEST

Green Line LRT Extension



Date June 18, 2015

Comment: The freight crossing at 21st Street (by
planned 21st St. station) is currently a quiet zone.
Since trains will be stopping there this should
remain as a quiet zone (no bells & whistles). This
is currently a quiet area that is directly next to a
public park. The SDEIS suggest this will have a
severe noise impact - this needs to be mitigated.

Finally co-location of freight rail & light rail causes
many safety concerns to nearby residents when
one considers the hazardous materials carried by
freight rail. This needs to be addressed and is
not considered by the SDEIS.

Mike Farrar / Marrow Collins

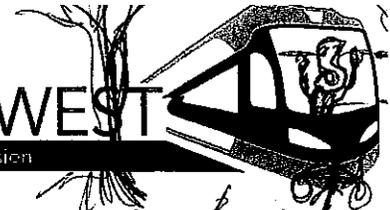
2515 W. 21st St.

Comment Card

DE-WATERING
WILL HAUNT
YOU!

SOUTHWEST

Green Line LRT Extension



Date

6/18/15

Comment:

Keep our lakes safe & clean. We never agreed to co-location in

the neighborhoods directly near SWCRT and we now need transparency and honesty around the

'Right to Know' We need to know much more about safety and plans for construction not mentioned in the Study. We're already dealt with bait and switch on many levels for this train, please reconsider. The costs are huge on every level. **RETHINK.**

- Cars don't come off highway soon enough w/ SWCRT

- STUDY IS MISLEADING & deficient & Not Credible

- We need Pean State!

- This area near the lakes is EVERYONE'S

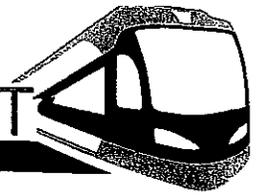
BACK

YARD

Get people here safely, with safety for the lakes, bicyclists, pedestrians, animals, as well. That's real equity.

Oh, wait. We already have that. IMPROVE it.

MAKE IT WORK FOR LESS MONEY, MAKE IT BETTER.



Date

6/18/15

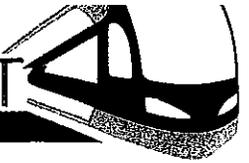
Comment:

① How deep is contamination of Kenilworth segment? Old RR ^{yard} ~~field~~ of much contamination what is plan & cost to mitigate so ground water ~~is~~ safe.

② How will costs be covered? Since they neither blue or green lines generate enough revenue to cover 30% of expense.

③ Maintenance costs will be increased if you short charge the costs to build. This ~~was not~~ is occurring with ~~the~~ current line in St. Paul Now! Corners are too sharp & wearing out wheels too quickly.

④ Met Council made mistake 25 years ago by not bldg bridge over Hawthorne Ave. Why do we citizens now have to pay for this mistake with this project which will NOT work! ~~is~~



Date 6/18/15

Comment: Where to start? I have filled out a number of these cards to ~~no~~ no end. Last year, you railroaded concerns w/ the "equity train" which was a clear lie at the time, & even more now. We were told that Eden Prairie people would use it - now, they ^{want} they take the bus. EP people now prefer the bus. North Minneapolis people now are going to take the bus to Target Field. Who is riding this train?

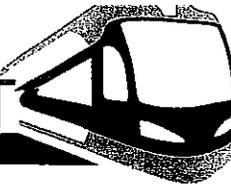
IF N. Mpls riders go to Target Field, why would Franklin Ave riders do the same? And once at Target Field, why not take the Eden Prairie BUS? It's Faster + Actually Goes to the Mall - where the Jobs Are?
 Seriously - why are you building this? It makes no sense financially or environmentally - even w/ additional costs & Environmental impacts.

One more time - PLEASE - someone - stop this -
No riders = No need. The numbers do not add up!

Beyond that the plan is ABSURD! Inches from a grain elevator, inches from people's homes, piles will be driven 65ft + a 50ft deep tunnel built. WHAT! Any engineer who believes that will not cause significant issues, should be fired. Would you do the

same next to your homes? - Would you? And who will be responsible for that sector

Most Important - The Lakes. 50ft deep tunnel next to Cedar Lake, below the water table? And then through the existing rail track pollution? This will destroy the Lakes. Who will be responsible for the destruction of the Lakes? Who wants that as a legacy? That is the legacy for you all - Build a train no one rides + destroy the Lakes + people's homes. Unbelievable. Stop This. ^{M.2-91}



Date 6/18/15

Comment: 1. Please return to the Drawing board

this route was way down on the list - 29th?

Please look at the other routes — ones that will be safe, healthier, economically beneficially equitable; racially + class beneficial.

THIS ROUTE is BAD. explore ^{Hwy} 100, West End, North/Northeast, Brownie Lake

2. Soil, groundwater, water will be prohibitively expensive to abate.

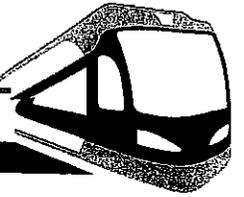
Comment Card

MP-07

Comment #42

SOUTHWEST

Green Line LRT Extension



Date June 18, 2015

Comment: No alternatives (other routes) in
SOEIS. The original ~~AE~~ LPA was
with no colocations, so it seems a serious
alternatives analysis should also have
been generated. The only option is to either move
the freight or open the scoping process looking at
REAL alternatives

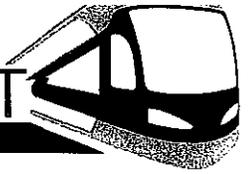
Comment Card

MP-08

Comment #43

SOUTHWEST

Green Line LRT Extension



Date June 8, 13

Comment: Liability - who carries it in case of
catastrophic loss in case of derailment associated
with colocation. TC & W only carries liability
on its train infrastructure and rolling
stock but what happens if there is a derailment
that causes catastrophic loss of life and property

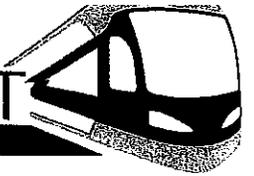
Comment Card

MP-09

Comment #44

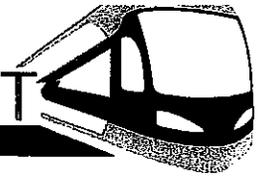
SOUTHWEST

Green Line LRT Extension



Date June 18, 2015

Comment: There is no substance to ~~the~~ freight
Safety in the SOEIS, including running the ^{tunnel} track
along a construction pit where freight carries
hazardous cargo including ethanol, propane, fertilizers,
anhydrous ammonia + fuel oil. No crash walls will exist
during construction. At a minimum ALL hazmat should
be moved out of the corridor at least during construction.



Date June 18, 2015

Comment: The ^{original} project assumed freight would be gone
So LDEIS needs to base all ~~other~~ topic areas
(noise, visual impacts, safety, ...) from the
base perspective of no freight since freight
will be now change from temporary status
to permanent status.

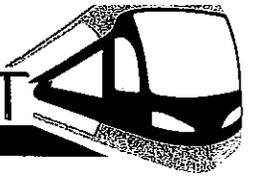
Comment Card

MP-11

Comment #46

SOUTHWEST

Green Line LRT Extension



Date July 18, 2015

Comment: No access for fire safety equipment during construction. No fire safety plan or public evacuation plan through Kendworth

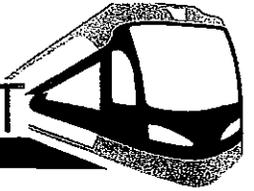
Comment Card

MP-12

Comment #47

SOUTHWEST

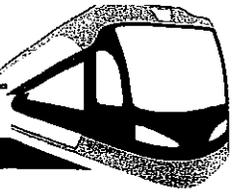
Green Line LRT Extension



Date _____

Comment: _____

*Hennepin County's
Bearing report original did not take
into account freight.*



Date June 18, 15

Comment: TC+W is a Class III RR whose infrastructure is currently poor. There are rotted ties, missing railroad spike, grade crossing pot holes, places where bridges do not appear to be structurally sound. Colocation of LRT w/ RR seems unwise. Infrastructure, ^{of maintenance} is not necessarily the sexy project. and long term ^{improvement of} infrastructure continues to not be maintained. Reassess the colocation of LRT + freight Get rid of the freight as promised

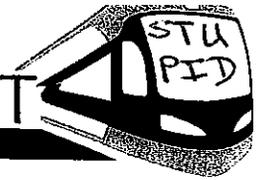
Comment Card

MP-14

Comment #49

SOUTHWEST

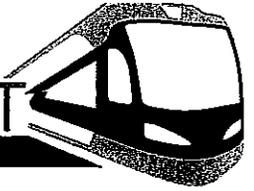
Green Line LRT Extension



Date 6/18/15

FOLLY

Comment: Once again the Met Council has failed
To address the real issues around the SWLRT
- it is in the wrong place - going where there are
no riders - and will never be any riders.
Minneapolis is in danger of becoming a
laughing stock for this \$2B folly.
You still aren't listening - only pretending to.



Date June 18, 2015

Comment: Terribly worried about current plans:

1. Desecration of Greenway
 - a. water table impact when damaged
 - b. noise from construction & trains
 - c. vibrations from construction & trains
 - d. crowds & cars with no parking for those who take train
2. Damage to property & property value
3. Safety hazard of oil ^{petroleum} freight cars

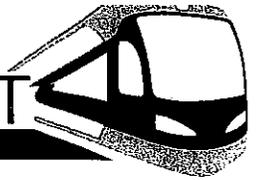
Comment Card

MP-16

Comment #51

SOUTHWEST

Green Line LRT Extension



Date 6/18/15 I am a resident of Calhoun Isles

Comment: I have great concerns and fears for the safety of
residents, visitors and the structures in the Kendall section -

The risks to the area from possible accidents seems too great
to not review the proposed route and the juncture of freight rails
and Light Rail -

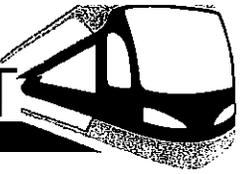
Comment Card

MP-17

Comment #52

SOUTHWEST

Green Line LRT Extension



Date June 18, 2015

Comment: I live in the Calhoun - Isles Condominiums, whose foundation is within 2-3 feet of the proposed shallow tunnel. I am concerned about both the construction impact on my home, as well as the liveability of my home once SWLRT is up and running. The SDEIS identified 36 Ground-Borne Noise Impacts on our condos and mitigation plans are left for the final EIS. In the push to reduce costs, I worry that mitigation will be curtailed or eliminated. For the Green Line at UM and MPR, rails were installed in such a way as to reduce vibration. These efforts have not been totally successful, which adds to my concerns. Residents of Calhoun - Isles are being asked to sacrifice by having SWLRT operating in our backyard. I respectfully request that all efforts be made to mitigate the long term effects on our homes.

MP-18

June 18, 2015

I live in the Calhoun Isles high rise and am concerned about the effects of LRT vibration on our condo complex and town houses. The EIS discusses vibration but only for an at grade train and with the magnitude scale beginning at 50 feet minimum distance. In our case the train will be in a tunnel where ground transfers vibration much stronger than in air and the distance between our foundation and the tunnel wall is less than four feet. The EIS does not come close to recognizing the potential vibration problems with our condo complex. The mitigation must be extraordinary to avoid livability problems.

The noise levels discussed in the EIS do not address the fact that noise is amplified the higher the resident, as with the high rise. The noise generated by the LRT while running as well as the bells when entering the West Lake Street station could be extreme.

Robert Brockway
3145 Dean Court # 904
Minneapolis, MN 55416

rmbrockway@comcast.net
612-920-3441

MP-19

Light Rail Oppositional Statement

To Whom It May Concern:

I am a condo owner at Calhoun Isles Condominiums. The proposed Light Rail route is of grave concern for me for the following reasons:

1. The potential and likelihood of compromise to the structural integrity of the High Rise buildings both during and after construction. My condo is directly adjoining Kenilworth Trail. When freight rail trains pass, by my windows vibrate, cupboards shake and even dishes rattle. The proposed construction may come within 2 feet of the current pilings for the condos.
2. The livability factors during construction.. Again, as my unit faces and is adjoining the proposed route, the noise disruption is likely to immediately devalue my property and the enjoyment of my property which I have heard could last up to 4 years.
3. The market value of my property will be directly impacted if trains are frequently passing by. Many residents have undersold their properties in order to sell before the property is not sellable due to construction. Property values have dropped.
4. The environmental concerns are numerous. Cutting of trees, destroying habitat, destruction of the pristine bicycle/walking/recreational route (one of the best in the country), interference of and potential contamination of wetlands and water in and around the lakes are also of concern.

Thank you for your attention.

Jan Search
Resident Calhoun Isles Condominiums

3151 Dean Court #105
Minneapolis MN 55416

Public Hearing - 6/18/2015
Southwest Green Line LRT Extension

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A P P E A R A N C E S

Metropolitan Council:

Adam Duininck
Steve Elkins
Sandy Rummel
Gail Dorfman
Jennifer Munt
Cara Letofsky
Wendy Wulff

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1 P R O C E E D I N G S

2 MR. DUININCK: All right. Everybody, we're
3 going to get started here in a minute, so if you could
4 find a seat.

5 All right. Good evening, everybody. Thank
6 you so much for being here. Welcome to the public
7 hearing on the supplemental draft environmental impact
8 statement for Southwest LRT. The hearing tonight is
9 hosted by the Metropolitan Council.

10 We have a number of council members up front
11 here joining me. I think I'll start by introducing
12 them on the far left and kind of working this way:
13 Council Member Steve Elkins, Council Member Sandy
14 Rummel, Council Member Gail Dorfman, Council Member
15 Jennifer Munt, Council Member Cara Letofsky, and
16 Council Member Wendy Wulff. So thank you to them for
17 being here and being here to listen.

18 There's also been a handful of elected
19 officials that have either been here and left or are
20 here; I just want to say hello to them: Commissioner
21 Marion Green, Commissioner Linda Higgins, and
22 Representative Frank Hornstein. So thanks for being
23 here tonight. And Park Board Commissioner Anita Tabb,
24 too.

25 So I think what we'll do, as in the way of a

Public Hearing - 6/18/2015
Southwest Green Line LRT Extension

1 format, we have a quick little presentation that Nani
2 Jacobson from the Southwest Project Office will walk
3 through that will cover how we got to where we are
4 today and the environmental impact statement process
5 and some next steps. So I'll turn it over to her for a
6 few moments to give a presentation before we start with
7 the -- the public hearing portion.

8 Go ahead, Nani.

9 (Per request, presentation not reported.)

10 MR. DUININCK: Thank you, Nani.

11 So if you would like to testify and haven't
12 signed up already, there's sign-up sheets in the back.
13 We have a full sheet here; I'm sure there will be --
14 they're coming in and signing up as we go. Please sign
15 in, and we'll call you up in the order in which you've
16 signed up.

17 And I just want to make sure that everyone
18 knows this is your opportunity to testify to the Met
19 Council. We're here to listen tonight; we're not going
20 to answer questions or have a discussion, but, rather,
21 you just come to the microphone and give your
22 testimony.

23 A number of us were here beforehand, and I'm
24 sure we'll hang around afterwards, too, if there are
25 other questions either related to the project in

Public Hearing - 6/18/2015
Southwest Green Line LRT Extension

1 general outside, kind of, the scope of the Supplemental
2 DEIS.

3 Individuals have to up two minutes to give
4 their presentation tonight. If you're representing a
5 group or organization, you can speak for up to three.
6 We'll have somebody keeping time here. We'll try to
7 keep people as close to on-time as best we can. There
8 will be little one minute and 30 second reminders when
9 your time is getting close to be up.

10 And let's see here. I will call -- I think
11 what I'll do is I'll call out two names, so that way,
12 the person who knows that they're next can get ready to
13 speak.

14 And with that, we will just jump right in.
15 The first person on my list -- and I'll do my best to
16 pronounce names; don't hold it against me if I
17 mispronounce it -- Russel Palma, and the second person
18 is Representative Frank Hornstein.

Comment #55

19 MP-01 MR. PALMA: Hello, I live in the Calhoun
20 Isles condominiums. These historic grain silo
21 buildings lie closest to the Southwest LRT along its
22 entire route, with the proposed shallow tunnel coming
23 within two to three feet of the building's foundation.
24 I am concerned about Southwest LRT's impact on the
25 building's integrity and liveability issues once the

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1 light rail is up and running regularly.

2 The SDEIS identified that there are 36
3 ground-born noise impacts on our condos and leaves
4 mitigation plans for the final EIS. In the push to cut
5 costs, I worry that mitigation plans could be curtailed
6 or eliminated.

7 I know that in the building of the Green Line
8 at the University of Minnesota and Minnesota Public
9 Radio, the light rail lines were built in such a way so
10 as to minimize vibration effects. Although these
11 efforts have not been completely successful, we
12 respectfully ask that our homes be given equal
13 consideration.

14 If the residents of the Calhoun Isles
15 condominiums are asked to sacrifice by having the
16 Southwest LRT operating within feet of our building and
17 to put up with two years of construction noise,
18 congestion, and inconvenience in our backyard, I ask
19 that the Met Council and the City of Minneapolis at
20 least do everything within their power to mitigate the
21 longterm effects on our homes.

22 Thank you.

23 MR. DUININCK: Thank you very much. And you
24 did a very good job of this, but I was asked to remind
25 people to just speak slowly and clearly. We're trying

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1 to type down and take for the record everything that's
2 said tonight, so just -- if I could just ask folks to
3 do that. And, also, make sure to state your name when
4 you come up to give your remarks.

5 Representative Frank Hornstein, and next is
6 Sara Brenner.
Comment #56

7 MP-02 REPRESENTATIVE HORNSTEIN: Thank you very
8 much, Mr. Chair and Met Council members.

9 I am Representative Frank Hornstein, and I
10 represent District 61A and the Minnesota House of
11 Representatives. And I apologize, I'm going to have to
12 run out; there was a long, scheduled forum on freight
13 rail safety issues in Northeast Minneapolis that I'm
14 speaking at, and that actually is very much related to
15 the comments I want to make tonight.

16 I've been working very hard over the last
17 year and a half on the issue of freight rail safety,
18 particularly as it relates to the transportation of
19 Bakken crude oil, and more recently, ethanol.

20 Thanks to citizens in my district who brought
21 to my attention the dangers of ethanol also being very,
22 very important for the State to address, we were able
23 to update some of the oil transportation safety
24 legislation that we passed last year to include ethanol
25 and other hazardous materials.

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1 The reason I bring up ethanol is that this is
2 a really very, very dangerous item that is being now
3 transported through the Kenilworth corridor. When
4 co-location was foisted on the City of Minneapolis, it
5 was pointed out was not part of the original plan and
6 one of the three areas that needed to be examined in
7 the supplemental EIS.

8 This issue was very much not as much on the
9 public radar as it is now. We have had many accidents
10 involving Bakken crude oil, and several involving
11 ethanol, just over the last year and a half, including
12 an ethanol train that exploded and burned and landed,
13 eventually, in the Mississippi River not too far away
14 from here in Dubuque, Iowa. So the dangers of
15 transporting oil and ethanol are real, and,
16 unfortunately, were not addressed in any meaningful way
17 in the Supplemental DEIS.

18 And I would implore you and urge you to take
19 this issue very, very seriously. In fact, in the
20 section of the DEIS under Potential Freight Rail
21 Impacts, the issue is completely glossed over. In
22 fact, under -- it talks about the Met Council having
23 the freight rail operations coordinations plan whose
24 purpose is to minimize impacts on freight owners and
25 operators. I would urge you to look at minimizing the

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1 impacts on our residents and our people here.

2 In terms of emergency response plans, there's
3 really nothing in this document that talks about how
4 first responders would respond to a -- a catastrophic
5 event involving an ethanol train explosion, if that
6 were to occur.

7 We have many issues with the freight rail
8 industry in terms of disclosure of hazardous materials;
9 that needs to be addressed.

10 What are the impacts during construction?
11 You're right in the Supplemental DEIS that there would
12 not -- freight rail operations during construction
13 would not be obstructed, disturbed, or slowed. That is
14 a very, very significant concern when there is all
15 kinds of activities around construction. And at a
16 minimum, I would implore you to not be having hazardous
17 materials coming through this corridor during
18 construction.

19 I think that rerouteing is a real issue, and
20 perhaps these ethanol trains should be rerouted. We're
21 not saying in St. Louis Park, but maybe there's some
22 other options that need to be explored in terms of
23 eventually rerouteing freight out of this corridor,
24 because, again, co-location was not part of the
25 original deal. And now that it's being foisted on us,

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1 I think there's a myriad of safety issues that need to
2 be addressed.

3 And, finally, you say in the DEIS that no
4 longterm impacts of freight rail are -- because of
5 freight rail are anticipated, and, therefore, no
6 mitigation measures have been identified.

7 And, again, we -- I would implore you to look
8 at safety measures in terms of negotiating very, very
9 assertively with the rail industry about what safety
10 measures they can take.

11 And I can tell you, in our discussions with
12 the freight rail industry at the legislature, I'm very
13 concerned that, unless really pressed, you won't -- we
14 will not see the types of mitigation and public
15 disclosure and right-to-know issues that need to be
16 addressed because, you know, the -- I bring up
17 right-to-know because, you know, in conclusion, I will
18 say that we have 20,274 residents in this co-located
19 area within a half mile of the -- of the track. And
20 this has been known now as the blast zone.

21 Citizens across the country who are dealing
22 with hazardous substances going by rail through their
23 neighborhoods are referring to the areas a half mile
24 from their house as "the blast zone."

25 The State has identified 326,000 Minnesotans

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1 that live in the blast zones for oil trains -- Bakken
2 oil trains, and we have 20,000 here in Minneapolis;
3 3,000 businesses; 54,000 employees; 11,148 households.
4 All of these people need to be assured and need much
5 more assertive work done at the public sector level
6 with the rail industry in terms of mitigating impacts
7 and assuring public safety.

8 So please, you know, in the intervening time
9 that you have to address these issues and update your
10 SDEIS, we need to have much more information in this
11 document concerning freight rail safety.

12 Thank you so much for your time, and I
13 appreciate your attention.

14 MR. DUININCK: Thank you very much,
15 Representative Hornstein.

16 Next is Sara Brenner followed by Shawn Smith.
17 Comment #57

17 MP-03 MS. BRENNER: Sarah Brenner from Minneapolis.

18 The SDEIS is a remarkable document, more for
19 what it doesn't include than what it does. It was
20 triggered by the substantial design change of
21 co-location and the necessity of a tunnel through
22 Kenilworth, yet the SDEIS makes no mention of the
23 considerable safety concerns triggered by co-location.

24 No consideration is given to the fact that
25 TC&W carries hazardous cargo, including ethanol, fuel

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1 oil, distiller's oil, and hydrous ammonia, propane, and
2 fertilizer. Any of these, in a case of derailment,
3 could cause incredible destruction, in some cases, near
4 feet from some people's home.

5 During construction, the risks will greatly
6 increase. Construction, by its nature, will interrupt
7 freight service and freight infrastructure. During
8 construction, there will be a 35- to 40-foot wide and a
9 25- to 35-foot deep tunnel that runs mere feet from the
10 freight and at a time where there will be no crash
11 walls.

12 The geometry of the corridor at the
13 pinchpoint is 57-feet and a 35- to 40-foot-wide pit dug
14 for the tunnel to be 17- to 22-feet for the freight
15 train and a buffer to the red town homes. That means
16 that ethanol trains, called "bomb trains," will be
17 perched on the edge of construction pit mere feet from
18 the edge.

19 If there were to be a dilemma, those cars
20 would fall into the construction pits in a domino-like
21 fashion; yet, there's nothing in the SDEIS that even
22 mentions risks of running daily ethanol unit trains
23 that can contain 10,000 tons of ethanol purchased
24 perched immediately adjacent to a deep pit prior to
25 putting in a crash wall. Am I missing something? Did

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1 anyone consider this?

2 Additionally, during construction, there
3 would be no access for the firefighting equipment in
4 case of derailment. If this project is to move
5 forward, minimally during construction, all hazmat must
6 be routed out of Kenilworth. Awareness of the danger
7 of oil and ethanol trains has come into citizens'
8 consciousness.

9 Thank you.

10 MR. DUININCK: Thank you very much.

11 Shawn Smith followed by Art Higinbotham.
12 Comment #58

12 MP-04 MR. SMITH: Good evening, Met Council
13 members. My name is Shawn Smith, and I live at 2420
14 West 24th Street in the Kenwood neighborhood.

15 There's two things I want to talk about in
16 the SDEIS, due to limited time; the first is cost. And
17 in the SDEIS, I don't think we feel very confident in
18 the cost that's expressed. The Blue Line went from 400
19 million to 715 million. The Green Line went from 840
20 to about a billion.

21 What will Southwest rail really, really cost
22 us? Because in the SDEIS, we still don't know what the
23 cost-cutting will be, and we also don't know if it's a
24 valid document because we don't know what is coming out
25 of what's in the SDEIS within the corridor.

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1 I'm also here because Kenwood residents have
2 been continually and actively engaged in this process
3 with little responsiveness from the Met Council. And
4 why do I feel that way? Well, that's issue No. 2, is
5 co-location.

6 We somehow ended up right back where we
7 didn't want to be, and SDIS with co-location, frankly,
8 we're pretty freaked out about it. So 25-feet -- I
9 actually brought a tape measure, but I don't think I
10 need it -- basically is from where I'm standing to the
11 back of the room. That's center rail to center rail.

12 This is the distance of the separation of the
13 two lines, because we didn't move freight rail -- or
14 should I call it ethanol rail -- you cut the north
15 tunnel so that now puts them at-grade, which we didn't
16 want, and the absolute co-location deal breaker, which
17 was brought upon us by a historic flip-flop by our
18 mayor.

19 If there is a derailment, the space that
20 separates the tunnage of ethanol from high-voltage
21 wires is a potential catastrophe, and we really ask --
22 we urge you to please relook at this line. Please
23 relook at this alignment, the cost, and the danger.
24 Please reconsider this route.

25 Thank you.

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1 MR. DUININCK: Thank you much.

2 Art Higinbotham and followed by Bob Brockway.
3 Comment #59

4 MP-05 MR. HIGINBOTHAM: Good evening, panel
5 members.

6 I am a former resident of 3431 Saint Louis
7 Avenue. I moved to St. Paul in light of the
8 co-location proposal for Southwest Light Rail. I moved
9 because I share with Representative Hornstein the
10 feeling that co-location of freight rail and light
11 rail, whether during construction or on a permanent
12 basis, is a severe personal threat. And I have to say
13 I feel sorry for those who remain in the corridor if
14 this proposal proceeds.

15 I've looked through the executive summary of
16 the DIS -- SDIS, and I find that it's not very
17 specific, which means that we're down to the final DIS
18 to get specific input of the citizenry to the
19 proposals.

20 One example: The tunnels proposed for the
21 Kenilworth corridor will generate a bit of noise.
22 They'll have 90-decibel fans to pump air out of the
23 tunnels. And I lived a hundred feet from the tracks;
24 that would have been a serious disturbance to reside
25 there and live with that.

But the overriding factor, as Representative

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1 Hornstein pointed out, is the potential for a
2 derailment and explosion of the magnitude that killed
3 47 people in Lac-Mégantic, Quebec two years ago and 24
4 derailments in the past year.

5 Thank you.

6 MR. DUININCK: Thank you very much.

7 Bob Brockway and then John Shorrocks.

8 Comment #60

8 MP-06

8 MR. BROCKWAY: My name is Bob Brockway, and I
9 live in the Calhoun Isles highrise. And I'm concerned
10 about the effects of the LRT vibration on our condo
11 complex and the home housing and the townhomes there.

12 The EIS discusses vibration, but only for an
13 at-grade train with a magnitude scale beginning at
14 50-foot minimum distance. In our case, the train will
15 be in a tunnel where the ground transfers vibration
16 much stronger than in air, and the distance between our
17 foundation and the tunnel wall is less than four feet.
18 The EIS does not come close to recognize the potential
19 vibration problems with our condo complex. The
20 mitigation must be extraordinary to avoid liveability
21 problems.

22 The noise levels discussed in the EIS do not
23 address the fact that noise is amplified the higher the
24 resident, as is -- as in a highrise. The noise
25 generated by the LRT while running, as well as the

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1 bells when entering the West Lake Street station, could
2 be extreme.

3 Thank you for listening.

4 MR. DUININCK: Thank you very much.

5 John Smorock (phonetic) -- Shorrocks, thanks.

6 And next is Angela Erdrich.

Comment #61

7 MP-07 MR. SHORROCK: I'm John Shorrocks, and I live
8 at Calhoun Isles.

9 I support totally what Representative
10 Hornstein was saying. There's a micro level; the
11 trains actually stop in the corridor for hours on a
12 time waiting for lights. Gas trains and electric
13 700-volt wires don't go -- just don't mix, and so the
14 probability of catastrophe is very, very high when the
15 rail is built.

16 There's also a huge catastrophe possibility
17 during construction, so none of these issues are raised
18 in the SDIS at all. And to us who are living right
19 there, within a few feet of the line, these are very
20 important issues and should be studied to the micro
21 level. Just have the trains standing there for hours,
22 and a gas train leaks gas. You know, they're not
23 perfect; just like gas in the car, it leaks.

24 So I'm really asking you to look at this in
25 great detail. Thank you.

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1 MR. DUININCK: Thank you very much.

2 Next is Angela Erdrich followed by Richard

3 Adair.

Comment #62

4 MP-08 MS. ERDRICH: Hello, my name is Angela

5 Erdrich, and I live in Kenwood. I live about six

6 blocks from where -- from the Kenilworth corridor, so

7 not close enough to hear or see it when the line is

8 built.

9 But my main interest in this has really

10 been -- stems back to when I moved here in 2009 and

11 someone sent me on an Earth Day clean-up trip, and I

12 went into Cedar Lake park, fell in love with it, feel

13 like it's a really beautiful, special, natural place

14 that is quite unusual to have such a large, expansive,

15 peaceful, green space right in the middle of the city.

16 I wanted to say I'm a pediatrician; I've

17 always worked in a public health setting. And I want

18 to thank Representative Hornstein for bringing up these

19 safety issues.

20 And I just want to add one thing about the

21 ethanol trains, is that they are presently -- they

22 travel underneath the Twins stadium, which is amazing

23 to me. Maybe people don't want to look at that, but

24 it's actually happening right now, and it's highly

25 flammable -- or anhydrous ammonia also travels under

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1 there.

2 From a public health viewpoint, we don't talk
3 about car accidents because -- we try to call them "car
4 crashes" because on a population basis, they're
5 somewhat preventible, and I hope you see your important
6 role in preventing future environmental disaster by
7 planning this to the best of your ability to prevent
8 the -- the problems associated with co-location of
9 these rails running so close together with hazardous
10 material.

11 I also want to say, as a bleeding heart
12 liberal, you don't often hear these stories about
13 cooperation and sharing and breaking out, but I want to
14 thank Bob Carney, because he's a Republican who, most
15 recently, did an awesome job investigating and tracking
16 down unused money and having it repurposed for -- for
17 the Metro Transit uses.

18 And he's done a lot for equity to have that
19 money used for immediate needs rather than using it as
20 leverage to enlist people as the face of this program.
21 He's -- what he's done is really going to serve people.
22 He found \$30 million that is going to be used for good
23 purposes.

24 Thank you.

25 MR. DUININCK: Thank you.

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1 Richard Adair, and next is Amity Foster.
Comment #63

2 MP-09 MR. ADAIR: My name is Richard Adair; I live
3 in the Bryn Mawr neighborhood in Minneapolis.

4 And I'm -- I come to the mic this evening to
5 thank the Met Council and the staffers for all the hard
6 work that you put in on creating the SDIS. It's really
7 a big document, and I think the quality of the work is
8 very high.

9 I'm going to talk about something slightly
10 different, the hazards of not building this line. And
11 I -- I appreciate the concerns that have been raised by
12 many friends of mine who are here this evening, and I
13 think they're legitimate. And particularly the concern
14 about transporting hazardous materials during
15 construction, I can really get that.

16 But I think we need to take the long view.
17 Starting in 1908, the first Model T Ford came off the
18 production line in Detroit. Since that time, we've
19 gotten used to getting around by car. And part of the
20 reason for that is that we have -- this has been
21 subsidized in an enormous way by the federal government
22 building a huge system of roads and bridges.

23 Now we're realizing that getting anywhere we
24 want to go using the internal combustion engine is just
25 not going to work; it's going to damage our planet.

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1 And some of us would like to live more compactly and to
2 take transit, and the reason for that is not because
3 it's a trendy lifestyle choice, but because we care
4 about the generations who come after us. And I would
5 urge you to take that perspective.

6 Thank you.

7 MR. DUININCK: Thank you very much.

8 Amity Foster, and next is Mary Pattock.

Comment #64

9 MP-10 MS. FOSTER: Hello, my name is Amity Foster;
10 I live at 1605 Second Street Northeast in Northeast
11 Minneapolis. I also work at ISALAH -- ISALAH, a
12 faith-based community organizing group.

13 I'm glad that the environmental studies is
14 being done, but part of a healthy environment includes
15 the access to jobs for people in North Minneapolis. I
16 want you to -- I'm here to encourage you to keep the
17 Penn station on the Southwest light rail line. It will
18 give people access to jobs; it will make their
19 community more healthy and more environmentally safe.

20 I would also encourage you to consider -- to
21 keep thinking about building in the bus lines that we
22 need in North Minneapolis to connect to Penn and to
23 connect to the Southwest light rail so that Minneapolis
24 can get better overall.

25 Thank you.

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1 MR. DUININCK: Thank you very much.

2 Next is Mary Pattock, followed by George

3 Puzak.

Comment #65

4 MP-11 MS. PATTOCK: Thank you. My name is Mary

5 Pattock; I live at 2782 Dean Parkway.

6 And I want to talk about the noise and

7 vibration issues that we found in the SDEIS. We find

8 it misleading and deficient in several ways. First of

9 all, as Ms. Jacobson pointed out earlier, the whole

10 point of the SDEIS is to evaluate the effects of the

11 changes that have been proposed from 2012 until now.

12 Therefore, the baseline data should have

13 represented the noise and vibration levels of 2012,

14 which did not include a freight train. But the DEIS --

15 SDEIS does use freight train noise as its base level,

16 and so it has the effect minimizing and falsely

17 representing how much more noise and vibration there

18 would be now compared to 2012.

19 Secondly, the SDEIS doesn't measure the

20 impacts on residences closer than 45 feet from the LRT

21 tracks, but the homes most impacted are only 31 feet

22 away. They need attention, too.

23 Finally, the SDEIS ignores the impact of

24 construction. Last month, impact pile driving on the

25 Tryg site, restaurant site near the West Lake station,

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1 caused serious damage to the Loop Calhoun condominiums
2 and other buildings. There was so much damage that the
3 project had to be halted, and the pilings had to be
4 pulled out since going forward was deemed to be, quote,
5 "catastrophic."

6 But the pile driving for Southwest LRT tunnel
7 would take place as close and closer to these buildings
8 and others. The SDEIS ignores this problem and gives
9 no hint of what kind of remediation there would --
10 there should be.

11 MR. DUININCK: Thank you very much.

12 Next is George Puzak followed by Susu
13 Jeffrey.

14 Comment #66

14 MP-12 MR. PUZAK: Good evening. I'm George Puzak;
15 I live at 1780 Girard Avenue South, Minneapolis.

16 As I was walking in, I was fortunate to find
17 these earmuffs. And they say Met Council, and I
18 thought, "Great, you'll be able to hear us." And my
19 teenage son reminded me and said, "Dad, just because
20 they can hear you doesn't mean they're listening."

21 Even if cost surprises and lawsuits don't
22 torpedo Southwest LRT, a fundamental flaw should.
23 Hennepin County's failure to include freight rail in
24 the project's scoping process required by the National
25 Environmental Policy Act, NEPA, scoping is the first

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1 step in the environment -- environmental review. It
2 identifies the issues, alternatives, locations, and
3 modes of transport to be studied in the transit
4 project's environmental impact statement.

5 But Hennepin County, in both its 2009 scoping
6 report and 2010 locally preferred alternative, failed
7 to include freight rail as part of the Southwest LRT.
8 Five cities then voted on this faulty plan.

9 Compounding the problem, in the summer of
10 2014, the Met Council imposed yet another fundamentally
11 different plan. This time, using municipal consent,
12 the five cities supported this, but the plan omitted
13 freight rail from the project. All these decisions
14 were made before the draft and the updated supplemental
15 were in place.

16 Contrary to law, Met Council has limited the
17 choice of reasonable alternatives and alignments,
18 reduce in costs, studying freight rail in the
19 Supplemental DEIS, and reopening municipal consent are
20 not sufficient remedies.

21 There are two remedies: One, move freight
22 rail out of the corridor then build your plan that's
23 been studied, or, two, reopen the scoping process and
24 include freight transport in there, and then maybe
25 there will be another alternative.

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1 Thank you.

2 MR. DUININCK: Thank you.

3 Next is Susu Jeffrey and followed by Nancy
4 Green.

Comment #67

5 MP-13 MS. JEFFREY: Chair people, thank you for
6 your time. I'm Susu Jeffrey; I'm speaking today for
7 friends of Coldwater. I do live in the blast zone;
8 I've lived in Bryn Mawr for nearly 30 years.

9 I remember when this project started with the
10 PR, and it was an equity project. And now that equity
11 has descended into busing people south on Penn Avenue
12 and then east to Royalston -- a proposed Royalston
13 station. With all of the racial problems that we're
14 experiencing lately, I find that a horrible plan, an
15 awful use of language, and I reject that equity
16 argument.

17 I think that the tunnel with its 55-foot deep
18 solid steel walls along about 2,800 feet is going to
19 really mess up the lakes, and I think we're talking
20 about losing the chain. The last time I swam across
21 Cedar Lake at sunset, I couldn't see my fingernails at
22 the end of my hands.

23 So what is this really about? It's about
24 development, and with development, we have a choice.
25 Uptown or Hidden Beach? Hmm, come on folks. Uptown is

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1 a venue; it's famous; it's alive. People want to go
2 there, and you want them to go two miles away to Hidden
3 Beach? You are really going to bring in a bunch of
4 people in that housing area in Hidden Beach?

5 I see that as a real police problem, just as
6 this cantilevered artifice down 900 steps to the Bryn
7 Mawr station at Penn Avenue. I -- it will require
8 full-time security. It's just waiting for people to be
9 hurt, so I say Uptown. Think -- rethink this. Start
10 with Uptown.

11 Thank you.

12 MR. DUININCK: Thank you.

13 Next is Nancy Green followed by Claire
14 Ruebeck.
15 Comment #68

15 MP-14 MS. GREEN: I also live in this Calhoun Isles
16 association, and I live in the townhomes, which we are
17 now referring to our area as the pinchpoint. This
18 planned construction of a shallow tunnel scares us, and
19 unfortunately, we have little trust in the process for
20 the following reasons:

21 The structural aspects of our condo towers
22 are unknown, as they were built a hundred years ago as
23 green terminals, and we do not have blueprints of the
24 foundation to give to the Met Council engineers,
25 despite the hours and hours of searching we have done.

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1 With only 40 percent of the engineering
2 complete, we do not feel there's sufficient studies to
3 provide us, the homeowners, with the needed information
4 to feel safe, confident, as the construction will occur
5 inches, not feet, inches from our homes.

6 Noise and vibration studies have not been
7 done on our property as we've requested, and we do not
8 feel confident that the current studies accurately
9 reflect what the effect will be on our property and,
10 specifically, the upper floors of that building.

11 Because we in Calhoun Isles are asked to
12 sacrifice our safety, our current lifestyle, along with
13 two years of construction noise, congestion, and
14 inconvenience, we ask the Met Council and the City of
15 Minneapolis to do at least everything they can within
16 their power to reroute and assure us the needed safety
17 net required.

18 Thank you.

19 MR. DUININCK: Thank you.

20 Next is Claire Ruebeck, followed by Bob

21 Carney.
22 Comment #69

23 MP-15 MS. RUEBECK: Hello, I'm Claire Ruebeck, and
24 I live in Minneapolis. And thank you having this
25 hearing today; I think it's important that you do
 digest what the citizens are saying.

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1 I just want to highlight a couple of things
2 that struck me as I thoroughly studied the SDIS. There
3 are many things I heard tonight that I had intended to
4 say, and so I'm doing my best to not repeat.

5 The first thing I want to comment on is that
6 the SDIS states that one of three justifications for
7 the need of the Southwest LRT is to develop and
8 maintain a balanced and economical multimodal freight
9 system. I would like further explanation as to why now
10 we have a transit system planned, but the focus -- one
11 of three -- the focus is now to justify a robust
12 freight system. I could not find any further
13 explanation in the SDIS.

14 New point: The National Transportation's
15 safety board has concluded that ethanol is as dangerous
16 as oil, and ethanol actively runs in that corridor, as
17 we've heard tonight. People don't want to think about
18 it; I don't want to think about it. I live there; it's
19 scary. I imagine you don't want to think about it.

20 The railroad that hauls it would prefer not
21 to haul it, but federal regulations require they haul
22 it. And there's no stopping it. It's as dangerous as
23 the oil that we're reading about in the newspapers and
24 that Senator Franken just wrote an eloquent essay on,
25 and we need to treat it as such.

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1 And, finally, I was surprised to find in the
2 SDIS that the Met Council has requested the FRA, the
3 Federal Railroad Administration, to advocate its
4 jurisdiction in this corridor where freight rail will
5 remain, and now we will introduce light rail. The FRA
6 must oversee this dangerous situation.

7 Thank you.

8 MR. DUININCK: Thank you.

9 Next is Bob Carney, followed by Sandi Larson.
 Comment #70

10 MP-16 MR. CARNEY: Hi, Bob "Again" Carney, Jr., I'm
11 a registered lab use for We the People, an informal
12 association.

13 I have been reporting since May 20th on the
14 decision of the legislature to eliminate \$30 million
15 that had been appropriated for Southwest Light Rail.
16 The current total for the State right now is
17 \$15 million.

18 I have a video online at YouTube talking
19 briefly with Chair Duininck about this yesterday, and
20 essentially, I asked him, "Where are you going to come
21 up with \$300 million?" And that is the 150 State money
22 that's missing, because Speaker Daudt told me at the
23 special session there's no more money coming in from
24 the legislature to Southwest Light Rail. And Chair
25 Kelly, in presenting it to the House, said, "We don't

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1 want to throw good money after that." These are just
2 facts.

3 Now, you have to clarify that this
4 \$300 million includes 150 matching money. Chair
5 Duininck essentially said that, "Well, you know, if
6 that money is not available, we're going to have to try
7 to find it somewhere else."

8 So I want you all to know we're not three --
9 \$341 million off right now; we're \$641 million off.
10 This is a totally unacceptable situation. We need to
11 freeze spending on this thing and go back to the
12 drawing board and to rescope this process and look at
13 alternatives.

14 There is an additional \$67.3 million that has
15 been allocated to be disburse -- dispensed by the CTIB,
16 another \$10 million, \$400,000 of that has been spent by
17 Hennepin County. There's \$67.3 million more that could
18 get spent this year unless we shut this thing down and
19 take a look at it.

20 And you've got to keep in mind that if this
21 thing keeps going on and we spend more and more and
22 more money, we start arguing that we've spent so much
23 money that we can't stop now. That takes away a
24 reasonable alternative, and the reasonable alternative
25 is no-build, to take a look at other options and

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1 rescope it.

2 Thank you.

3 MR. DUININCK: Thank you.

4 Next is Sandi Larson, followed by Cathy --

5 and I apologize on the last name -- Deikman or

6 Deilkman.

7 Comment #71

8 MP-17 MS. LARSON: Good evening. My name is Sandi
9 Larson, and I live at 2800 Dean Parkway in the blast
10 zone.

11 As a result of co-location, the current
12 design calls for that south tunnel to run from just
13 south of the Kenilworth lagoon to just north of the
14 Lake Street station. The SDEIS, nor any of the
15 supplemental documents or technical drawings, addresses
16 the fact that there is an existing sewer main that runs
17 and crosses the proposed location of the south tunnel,
18 and that will need to be removed and relocated.

19 That force main was just installed in 2013,
20 and it runs underneath the railroad tracks and the
21 Kenilworth trail between Depot Street and West 28th
22 Street, which is right next to Parkside and park -- a
23 fourth Minneapolis park.

24 And the force main consists of a
25 five-foot-wide casing pipe that's the top of the casing
 pipe is 17-feet below ground level, and the bottom of

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1 the casing pipe is 22-feet below, and then two 18-inch
2 force main sewer pipes run through that.

3 The south tunnel construction plan indicates
4 the construction pit on the diagram over there to be
5 done to a depth of approximately 35 feet in that very
6 location, and the drawings don't include anything about
7 the existing sewer force main that's there, and it's in
8 the path of the tunnel.

9 So that force main needs to be relocated
10 and -- and put somewhere else. There are going to be a
11 lot of costs associated with this, removing and
12 relocating it, reengineering lift stations if it has to
13 go deeper below the tunnel, remediations of the park if
14 there is any damage, cost of road work at 28th Street
15 and Depot, cost of potential damage, cost of
16 mitigation, noise, and vibration.

17 And I'm just requesting that you please be
18 transparent and address this removal and
19 installation -- reinstallation of the sewer force main
20 line in the design of the project as well as all the
21 associated costs.

22 Thank you.

23 MR. DUININCK: Thank you very much.

24 Next is Cathy -- is it -- Deekman (phonetic)?
25 I'm sorry.

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1 MS. DEIKMAN: It's Dikeman (phonetic.)

2 MR. DUININCK: Deikman. Thank you.

3 And Stuart Chazin is next.

Comment #72

4 MP-18 MS. DEIKMAN: I'm a resident of Minneapolis,
5 and others have spoken regarding very important
6 omissions and risks that were not described in the
7 SDEIS, so I'm not going to repeat those.

8 I'm speaking to you today because of the risk
9 posed to the Minneapolis Chain of Lakes by category
10 issue. I strongly question the land use designation of
11 the Kenilworth channel as category 3. The SDEIS
12 designates the grassy banks of the channel as falling
13 within the most noise-sensitive category, category 1.
14 However, the channel itself is not included in that
15 most sensitive designation, but instead, it's
16 classified as institutional land use.

17 The SDIS states that the grassy area on the
18 banks of the lagoon fall within category 1 due to the
19 passive and noise-sensitive recreational activities
20 that occur there where quietude is an essential feature
21 of the park.

22 The designation of category 1 versus 3 for
23 the channel appears to hinge excessively on one word,
24 "passive." However, quietude is equally and very
25 clearly an essential feature of the Kenilworth channel

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1 itself, and everyone knows this. And the activities
2 that occur there, though peaceful, very peaceful,
3 they're not passive, include canoers and cross country
4 skiers gliding serenely on the water or ice while those
5 on the grassy banks look on.

6 Most significantly, the consequences of
7 placing the Kenilworth channel at category 3 is that
8 both the obligation to mitigate impacts is lowered, and
9 the threshold to establish severe impact is higher and
10 harder to reach.

11 Had the Kenilworth channel been accurately
12 designated at category 1, then the channel would have
13 been only one DBA below severe impact. The difference
14 in obligation on this work project office to mitigate
15 the severe versus moderate impacts is critical.

16 Thank you.

17 MR. DUININCK: Thank you.

18 Stuart Chazin, and next is Jeanette Colby.
19 Comment #73

20 MP-19 MR. CHAZIN: Hi. Thank you for having me.

21 My name is Stuart Chazin; I represent the Kenilworth
22 preservation group. Before I go forward, I just want
23 to thank Mark Furman and the staff for doing this
24 difficult work that they have been doing, so thank you.

25 What I would like to ask is -- I'm confused
 why we're spending \$1.685 billion or \$2 billion to do

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1 this -- this line when the numbers aren't there. The
2 governor originally said that he wanted to add the
3 Mitchell Road if this light rail is going to be done,
4 now we're talking about getting rid of the Mitchell
5 Road and maybe one or two other stations. You're
6 talking about getting rid of one or two other stations
7 in Minneapolis -- in North Minneapolis.

8 If we cut those out, where's the ridership?
9 The purpose of this LRT from day one, from what I
10 understand, is getting people from Minneapolis to
11 Eden Prairie, and Eden Prairie to Minneapolis. But if
12 we're cutting out these three to five stations, the
13 ridership, the numbers, are not there. I'm confused.

14 Even in your numbers, the new numbers that
15 you have given for the three stations in North
16 Minneapolis, ridership has gone down.

17 Don't I get three minutes? KPG. "Groups
18 will get three minutes."

19 Ridership has gone down at those three
20 stations, so, really, there is no ridership in North
21 Minneapolis because they -- there is no residents.
22 They have to take a bus from the other side of 55 to
23 get to the three stations, and so there's nothing
24 there; there's no ridership there.

25 At the 21st Street station, you're saying

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1 there's 1,500 people that will be riding that every
2 single day. Tell me where they're coming from,
3 Franklin Avenue? They're going to take that bus five
4 miles, three miles, whatever it is, and people from
5 North Minneapolis where you're saying you're trying to
6 benefit them from, there's only 300 at one station, 300
7 at another station, and approximately 300 at another
8 station? That makes no sense.

9 There is no ridership at 21st station, and
10 you have it. There is no ridership at the three
11 stations in North Minneapolis. And if you cut out the
12 two stations -- or three stations in Eden Prairie,
13 where does it benefit? You're going to take a bus to
14 the stations? That defeats the purpose.

15 Why are we spending \$1.685 billion of our
16 money for a project that doesn't make sense anymore? I
17 never thought it made sense in the first place why it
18 wasn't going through the Uptown, but it does not make
19 sense now.

20 I'm in favor of light rail. I'm in favor to
21 go where there are ridership; there isn't. The
22 population is in -- the population of -- it doesn't
23 matter where it is, it's just not where you guys are
24 building it.

25 I guess I'll leave it at that. Thank you for

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1 your time. Have a good night.

2 MR. DUININCK: Thank you.

3 Jeanette Colby and next is Camille Burke.
4 Comment #74

5 MP-20 MS. COLBY: Good evening, Chair Duininck and
6 council members.

7 I want to say that I am incredibly impressed
8 with some of the points that have been raised tonight
9 and the way that they've been raised, and I hope that
10 you all are hearing them and taking good note. I'm
11 going to say -- I'm going to echo some of the things
12 that have been said. And I'm just going to say
13 something a little bit differently, and I hope that you
14 can hear that, too.

15 The -- the LPA that was selected for this
16 route and approved by all five municipalities was based
17 on the alternatives analysis that said that in order to
18 make way for the LRT, the freight rail needed to be
19 moved. The alternatives analysis was kind of the
20 fundamental document for this project.

21 We didn't -- that didn't happen; there was a
22 new vote from municipal consent, and this SDIS is
23 supposed to cover those areas that weren't covered in
24 the previous DEIS that was based on the -- on the
25 alternatives analysis.

 But what we're doing now is we're taking a

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1 temporary situation that was supposed to go away and
2 making it permanent. We're making -- so in -- in a
3 sense, it's a new project. We're taking something that
4 was supposed to be gone and making it permanent. We're
5 spending hundreds of million -- tens of millions of
6 dollars anyway to do that.

7 I was just at a meeting yesterday looking at
8 the freight bridge that's going to go over the channel,
9 and that's a big, heavy bridge that's going to cost a
10 lot of money; it's a permanent fixture.

11 So the SDIS needs to assume a basis of no
12 freight for all impacts, including noise, safety, and
13 visual impacts. And just on the visual impacts, I'm
14 going to speak to a detail here: The SDIS is much
15 different from the DEIS. And the SDIS has the nerve,
16 I'm sorry to say, that there will be not a substantial
17 impact in the area of the Kenilworth corridor where we
18 will have co-location at grade.

19 The Canton area is the -- the tracks, all the
20 noise and visual mess is considered by a consultant in
21 Colorado looking at Google Earth and some photos as not
22 significant. So I would strongly contest that finding
23 in the DEIS.

24 But just to reiterate: We need to assume a
25 basis of no freight for all aspects, including noise,

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1 safety, which many other people have spoken to, and
2 visual impacts.

3 Thank you.

4 MR. DUININCK: Thank you.

5 Camille -- Camille Burke followed by Kathy

6 Low.
Comment #75

7 MP-21 MS. BURKE: Camille Burke; I live at 2400
8 Thomas Lane. I'm in the blast zone as well.

9 I have three primary concerns. The first one
10 concerns the freight bridge that's being built. It's
11 my understanding that it will be 50-feet from where the
12 current track is going.

13 As I walk that path, right now, the track is
14 quite close to homes. I've, in a joking way, say it
15 looks like it's going to be going on someone's deck. I
16 think that that is something that I'm not sure that you
17 really realize, and I would encourage you to walk that
18 and see where that 50-feet, that new freight train
19 track is going to go. It will double the size of the
20 current bridge that's on the channel right now, and
21 that's a very, very large environmental statement.

22 My second point: This is an old railroad
23 that is an old railroad yard. It is contaminated,
24 contaminated, contaminated, and you all know that. How
25 far down is it contaminated? That's one thing I'm

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1 concerned about: When you dig that 50-foot tunnel, are
2 you going to be disturbing all of that old railroad bad
3 contamination, and is that going to effect our ground
4 water? Is it going to affect the water of Cedar Lake
5 and Lake of the Isles and our whole chain of lakes?

6 And my third point: The Green Line and the
7 Blue Line, the revenue costs rights now are 30 percent
8 or less of the cost to operate it. What is -- what
9 allowances -- and I learned that from St. Paul Pioneer
10 Press.

11 What allowances are you planning on to make
12 this financially viable, particularly when it's real
13 clear we're not going to have the ridership? I'm
14 concerned about that because that means I, as the
15 taxpayer, have to do pay that, and I don't want to do
16 that.

17 Thank you.

18 MR. DUININCK: Thank you.

19 Kathy Low followed by Michael Wilson.
20 Comment #76

21 MP-22 MS. LOW: Hi, Kathy Low, Minneapolis. Thank,
22 you commissioners and Sophia.

23 Despite the 2011 report by Hennepin County
24 stating that there was 20 years of understanding that
25 freight rail would be removed from the Kenilworth
 corridor regardless of LRT or any other project,

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1 despite the City of Minneapolis' stance against
2 co-location, despite your own DEIS conclusion that
3 recommended against co-location, despite the fact that
4 fitting light and freight rail into this narrow
5 corridor will require massive tunnel portals, crash
6 walls, large cement structures and bridges, and removal
7 of vegetation, despite your own conclusion that this
8 plan will have an adverse effect on the lagoon and the
9 Grand Rounds Historic District, despite your legal
10 obligation to avoid or minimize harm under Section 4F
11 law, you make the literally incredible statement in the
12 SDIS that the LPA, with their attention of freight rail
13 in the Kenilworth corridor is the project's
14 environmentally-preferred alternative and would result
15 in less harm to Section 4F protected properties.

16 I think that most people can recognize that's
17 not credible. Your process has permanently diminished
18 my trust in government.

19 MR. DUININCK: Next is Michael Wilson,
20 followed by Eric Larsson.
Comment #77

21 MP-23 MR. WILSON: Good evening -- excuse me -- my
22 name is Michael Wilson; I live at 3439 St. Louis
23 Avenue, and I represent the 57 property owners of Cedar
24 Lake Shores Townhome Association.

25 One thing I would like to talk about first

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1 is -- the railroad corridor was just brought up a few
2 moments ago -- St. Paul and Pacific Railroad first put
3 railroad tracks through this corridor in 1864. We've
4 had 151 years of heavy freight rail running through
5 this corridor, with the exception of 12 years from 1986
6 through 1998 when the Twin Cities and Western began
7 running freight again through the -- the Kenilworth
8 corridor on a temporary basis.

9 So 150 years of running freight through the
10 corridor. I'm concerned about contamination from a
11 railroad of use of that corridor. I'm also very
12 concerned about contamination at the former Cedar Lake
13 yards at the north end of the Kenilworth corridor. You
14 can check your -- your Hill and Lake Press tomorrow for
15 more information on contamination of the Cedar Lake
16 yards that has only begun to be touched on in the
17 Supplemental DEIS.

18 So far, you have done a phase 1 ESA and
19 discovered that there is considerable pollution and
20 ground water contamination, but all the SDIS does is
21 list things that are typically found in former rail
22 yards, typically found in former and -- and active rail
23 corridors, including extensive arsenic poisoning. I'm
24 very concerned that the Supplemental DEIS has only
25 begun to touch on these issues.

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1 Second thing I'm concerned about, before I
2 get specifically to the townhomes, is the residents of
3 Cedar Isles deemed neighborhood have been asked to bear
4 a heavy cost for having co-location go through our
5 neighborhood, yet, we are being almost barred from
6 using the West Lake Street station. Your cost cuts,
7 the 50 cost cuts which you have advanced, include
8 eliminating vertical circulation to the West Lake
9 Street station -- no, three minutes.

10 Okay. Then I'll go on from that to talk
11 about the tunnel which others have done very
12 eloquently. We're talking about vibrating down sheet
13 pilings, which may or may not work, but what I'm
14 concerned about is that this is just humorous to think
15 that you can build that tunnel inches away from the
16 Cedar Isles towers and only a few feet away from the
17 Cedar Lake Shores Townhome Association.

18 The SDIS does not talk about the ventilating
19 machines that are going to be at either end of the
20 tunnel. They won't be running all the time, but they
21 will be tested. The SDIS does not talk specifically
22 about the piston effect of trains entering the tunnel
23 and pushing air the other direction traveling 45 miles
24 an hour through the tunnel. It doesn't talk about
25 those things which directly affect us in our townhomes.

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1 I learned when I was growing up that when you
2 get it wrong, say so. I think that putting both
3 freight and light rail through the corridor, you've
4 gotten it wrong. I wish you'd go back to the drawing
5 board.

6 Thank you.

7 MR. DUININCK: Thank you.

8 Next is Eric Larsson followed by Doug

9 Peterson.
10 Comment #78

10 MP-24 MR. LARSSON: Hello, I'm Eric Larsson of 2440
11 West 24th Street, also in the blast zone. We are told
12 that the dangers of co-location can be managed, yet the
13 NTSB has been forced to investigate one ethanol
14 explosion per year since 2006. Each time, it finds
15 unpreventable causes that will be exacerbated by this
16 into alignment, and yet the SDIS does not mention these
17 risks or the necessary abatement procedures.

18 Here is a representative timeline from an
19 event in Cherry Valley, Illinois in 2009. This train
20 departed from an ethanol plant in Tara, Iowa on its way
21 through Illinois with 75 tank cars loaded with over
22 2 million gallons of denatured fuel ethanol, which is
23 typical of what travels through the Kenilworth.

24 A half hour earlier, the train dispatcher had
25 received two weather reports warning of severe flash

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1 flooding, yet he did not advise the train crew as per
2 the manual of the railroad. At 7:16, the train crew
3 requested and received clearance to proceed into
4 Illinois, still receiving no warning of the weather.

5 At 7:35, the first of several citizens
6 started calling 911 warning of the washing out of the
7 tracks. At 8:16, the 911 center began calling the
8 emergency call center for the railroad, and the call
9 center, in turn, started making repeated calls to the
10 local train dispatcher, whose phone was busy.

11 At 8:17, when the train was 30 miles from the
12 wash-out, they again requested a proceed signal, which
13 they received with no weather warning. When the train
14 did cross the wash-out, the -- both the engineer and
15 conductor were sitting in front, did not see the
16 wash-out. The only reason they knew that it happened
17 was because the automatic brakes were applied. They
18 had to get out and walk back 58 cars to see the
19 explosion.

20 They also were not warned that there was an
21 underground natural gas pipeline, and they were not
22 warned that the -- and the investigators, sorry, were
23 not warned of what the contents of the train were until
24 three hours later.

25 Thank you.

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1 MR. DUININCK: Thank you.

2 Next is Doug Peterson, followed by Arlene --

3 I apologize, I can't spell the last name. It starts

4 with an "F," I believe.

Comment #79

5 MP-25 MR. PETERSON: My name is Doug Peterson; 3315

6 St. Paul Avenue. I'm a cack (phonetic) representative

7 of CIDNA. I've got two concerns which -- I've got lots

8 and lots of concerns, but most of them have been

9 approached by other speakers.

10 One of the concerns is the sewer line that

11 has gone from Depot Street to twenty -- 28th Avenue

12 that was put in in 2013. I talked to the head of

13 the -- or at least the PR person for that particular

14 project. This was a Met Council project.

15 And I asked him how deep that was going to be

16 and what was going to be happening in the event that

17 there was going to be a tunnel in there, and he said,

18 "Well, there's -- the top of it would be 27 feet below

19 the surface, and it would be able to be" -- I've got

20 three minutes; cack (phonetic) representative from

21 CIDNA.

22 The person from the Met Council, the PR

23 person, said that things could be taken care of; it

24 could be raised or lowered, or whatever. At that same

25 time in January or February in 2013, I talked to Mark

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1 Furman. He wasn't aware of any possibility of any
2 shallow tunnel or any other kind of a tunnel.

3 Now, as was stated earlier, there was nothing
4 in the SDIS about the sewer and what's going to happen.
5 There has been talk amongst -- or from some
6 representatives of the State or the -- the council that
7 they don't know whether or not the tunnel is going to
8 go above the sewer or below the sewer.

9 I'm concerned that the engineers are going to
10 wait until they get up close to that and then find out,
11 "Oh, boy, this is going to cost a whole lot of money.
12 Maybe we better run just right on top, co-location."

13 The other concern that I have is the pile
14 driving and the retaining walls that are going to be
15 going into the corridor there by -- by my house. The
16 Tryg restaurant teardown and Trammell Crow installation
17 of -- or construction of a new building there was
18 stopped because of the damage done by pile driving to
19 nearby buildings.

20 We've got -- our neighbors are four feet away
21 from the tunnel. There's going to be pile driving.
22 There's going to be retaining walls. Has any of that
23 been considered, and has anybody talked to Trammell
24 Crow about what the problems are going to be and what
25 the costs are going to be and what the resolutions are

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1 going to be?

2 I'm concerned that this is going to be one
3 more bait-and-switch type of thing where you finally
4 get to that area, and you say, "Oh, this is too
5 expensive. We're going to have to have co-location
6 here, too."

7 Thank you.

8 MR. DUININCK: Thank you.

9 Next is Arlene Fried followed by Mathews
10 Hollinshead.
10 Comment #80

11 MP-26 MS. FRIED: My name is Arlene Fried. I live
12 in south Bryn Mawr, and I have rollerbladed along the
13 trail; that's one of my relationships with the trail.
14 I'm also a co-founder of an organization called Park
15 Watch, which has been around for about 10 years now,
16 and we can meet concerns about park board issues. We
17 have a wonderful new superintendent; however, we did
18 not when we started.

19 I have multiple reservations about Southwest
20 LRT and also about the construction process. Many of
21 these have been mentioned here already, so I don't have
22 to mention them. So I'll just say I want to mention a
23 special concern about the negative effects of
24 dewatering on Cedar Lake.

25 Thank you.

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1 MR. DUININCK: Thank you.

2 Mathews Hollinshead followed by Captain Jack
3 Sparrow.
4 Comment #81

4 MP-27 MR. HOLLINSHEAD: I'm Mathews Hollinshead; I
5 live in St. Paul. I'm also a conservation chair this
6 year for North Star Chapter, but I'm speaking
7 personally tonight.

8 If you take \$5,000, which is a very
9 conservative estimate, of the cost of maintaining a car
10 for one year -- I've seen studies that say \$9,000 is a
11 better average estimate -- multiply it by perhaps
12 500,000 motor vehicles in the Twin Cities, you get
13 \$2.5 billion per year for rolling stock alone for our
14 highway system for individual drivers who own motor
15 cars.

16 The entire budget of this stance now at
17 \$1.9 billion, and it's at least a 50-year life cycle, I
18 would suggest to those who argue about the money that
19 we get rid of some highways and get rid of some of the
20 expense forced on people who drive who have no choice
21 but to spend this \$5,000 or \$9,000 or whatever it is
22 per year on their cars to get to jobs, to get to
23 hospitals, to get to daycare, to get to grocery stores.
24 The Twin Cities made a tragic mistake in past decades
25 getting rid of a rail transit system and not building a

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1 new one.

2 I would also like to say something on oil
3 trains and ethanol trains. I agree, they shouldn't be
4 in our cities. They shouldn't be on this line. I hope
5 the Met Council can acquire some power over freight
6 rail lines.

7 It's high time that we, like other advanced
8 countries, did our own control planning and regulation
9 of these privatized transportation companies which
10 don't operate the same way in other developed
11 countries.

12 I'll submit the rest of my comments in
13 writing. Thank you.

14 MR. DUININCK: Thank you very much.

15 Up next is Captain Jack Sparrow; second --
16 followed by Sally Rouse.
Comment #82

17 MP-28 CAPTAIN JACK SPARROW: Hey, I'm Captain Jack
18 Sparrow; I live at 3522 Bloomington Avenue South, and
19 I'm a candidate for State Senate, District 62.

20 At the last municipal consent hearing, I
21 referred to SWLRT as a billion-dollar boondoggle, but
22 that was really wrong. It's really -- to do it right,
23 it's going to be a multi-billion-dollar boondoggle,
24 made cheaper by eliminating certain stations that were
25 used in the argument that we're going to be providing

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1 equity for people.

2 But if we're going to be eliminating
3 stations, if we're going to be making involvement
4 shorter than it was before, I think we're taking away
5 many of the benefits to -- to people.

6 The flaws of the SDEIS are obvious. The
7 internal analysis says that the south -- Southwest
8 connects with the Blue Line. It connects with the
9 Green Line. How much did you pay for this study?

10 I listened to a recorded interview with the
11 president of the western -- Twin Cities & Western
12 Railroad, and I'm going to talk about the ethanol and
13 the oil and other chemicals that are being hauled. But
14 according to Mr. Wegner, any chemical can be hauled on
15 this -- on this -- on this railroad; it's required by
16 federal law. They may not want to haul, it but they
17 have to.

18 Chlorine -- and chlorine, of course, was used
19 as a -- a poisonous gas in World War I, and more
20 recently, in Iraq. So I think we have to be concerned
21 about all the chemicals that might possibly,
22 potentially be transported along that route.

23 Another point I wanted to make is it turns
24 out that the Green Line was built more with development
25 in mind than with actual ridership and efficiency and

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1 speed. Now, it turns out that people can ride a
2 bicycle faster than they can travel down the Green
3 Line -- on the Green Line. And so I think it's
4 important that we not -- thank you.

5 MR. DUININCK: Next is Sally Rouse -- Roose
6 (phonetic), sorry if I'm mispronouncing that --
7 followed by Peter Wagenius.

Comment #83

8 MP-29 MS. ROUSSE: Hi, I'm Sally Rouse; I live in
9 Bryn Mawr.

10 I want you to return to the drawing board. I
11 think this route was number 29. I'd like you to at
12 least look at the other ones.

13 And two main points to make: One, it's
14 unsafe to the environment, the water and the soil; that
15 was made clear. It's unsafe to the people in cars and
16 skis and bikes and on foot.

17 The railroad -- last time I was at one of
18 these meetings, the railroad announced they were
19 changing the safety distance. It was 24-feet, and,
20 boom, it was 12-feet. Suddenly, it was 12-feet, like,
21 a train could tip over, and it would be okay if it was
22 only 12-feet from another anything; it used to be 24.

23 Number two, abating these unsafe, unhealthy
24 issues, will be prohibitively expensive, and I think
25 you know that. And I hope that you are looking at

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1 other routes, the other 28 routes that were considered
2 before this one, parallel to your considering costs for
3 this one.

4 I agree with the thousands of others who
5 reject co-location. A tunnel is still co-location, and
6 we demand that you return to looking at other routes.

7 I also, since I have a little bit of time
8 left, want to just -- 60 -- 30 seconds left, just want
9 to say that when you refer to the bike path and the
10 people who use it, it's really condescending to only
11 call it recreational. For a lot of people, this is
12 essential to how they get to work, and that should be
13 folded into it.

14 Thank you.

15 MR. DUININCK: Thank you.

16 Next is Peter Wagenius, and he's the last one
17 to have signed up.
18 Comment #84

18 MP-30 MR. WAGENIUS: Thank you, Mr. Chair, and
19 thank you Met Council members for your willingness to
20 hold this hearing. Mayor Hodges -- I work for Mayor
21 Hodges, and -- and she would like to extend her thanks
22 to everybody here, the citizens present for their
23 remarkable politeness and thoughtful comments in the
24 face of this project's transformation from what it was
25 premised to be into a totally different project than it

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1 is today.

2 I will share this experience with Mayor
3 Hodges as a refreshing tonic compared to the collective
4 amnesia which permeates the conversation that takes
5 place at the Corridor Management Committee.

6 At the CMC, they are saying it is time now
7 for the burdens of this cost-cutting to be shared
8 equitably among the five cities along the line, as if
9 the burdens of this project have been shared equitably
10 up to this point.

11 At those meetings, there is no recognition
12 whatsoever that the burden of freight fell 100 percent
13 on one city. At those meetings, there was no
14 recognition that this project was planned to be and
15 promised to be totally different than it is today with
16 freight relocated from the corridor. This is beyond
17 dispute. Whether or not St. Louis Park acknowledges
18 their -- their promise, the fact that Hennepin County
19 promised to reroute the freight is not disputed.

20 Mr. Colby and Mr. Puzak -- Ms. Colby and
21 Mr. Puzak are absolutely right about their origin, the
22 root cause of all these challenges. Southwest LRT has
23 been a project devoid of accountability.

24 Why did the federal government have to force
25 the project to incorporate freight issue into the

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1 project's scope and budget? Did anyone ever think
2 there was going to be a solution to the freight problem
3 which was free, which did not cost money? How much
4 more has it cost the project and the residents of
5 Minneapolis because the first issue wasn't dealt with
6 5, 10, 15, 17 years ago?

7 If neither of the government agencies
8 responsible for this situation are willing to tell the
9 community, "Let the City of Minneapolis do it," you are
10 right to be angry and frustrated. You are right, and
11 your politeness in the face of this is entirely
12 amazing. This is the opposite of what you were told
13 this project was going to be.

14 So if no one else can say it, I'm sorry.

15 MR. DUININCK: Thank you -- thank you, Peter,
16 and thanks, everyone. With that, the public hearing is
17 done for the evening, so thanks, everyone, for being
18 here. We really appreciate the feedback. We'll be
19 hanging around afterwards if you want to talk with us
20 about this project. Thanks. Bye.

21 (Proceedings concluded at 7:25 p.m.)

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1 STATE OF MINNESOTA)
 : ss CERTIFICATE
2 COUNTY OF ANOKA)

3

4 BE IT KNOWN that I, Rebekah J. Bishop, took the
foregoing transcript of proceedings;

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6 That the foregoing transcript of proceedings is a
true record of the testimony given;

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8 That I am not related to any of the parties
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10 That the cost of the original has been charged to
the party who noticed the transcript of proceedings, and
that all parties who ordered copies have been charged at the
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13

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Rebekah J. Bishop, RPR, CRR
Notary Public
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A P P E A R A N C E S

Metropolitan Council:

Adam Duininck
Jennifer Munt
Steve Chavez
Deb Barber
Gary Cunningham

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1 P R O C E E D I N G S

2 MR. DUININCK: The room got quiet; that must
3 mean it's time to start. Good evening, everyone.
4 Welcome. Thanks a lot for being here.

5 Welcome, this is a hearing on the
6 supplemental DEIS being held by the Metropolitan
7 Council, by myself, Adam Duininck, and a bunch of
8 council members which I'm glad to introduce:

9 Good evening, Jennifer Munt, who has been
10 very active on this corridor on the CAC -- she coaches
11 the CAC, the Citizens' Advisory Committee; Council
12 Member Deb Barber from Scott and Carver County, most
13 of -- both of those counties; and Council Member Gary
14 Cunningham, who represents Minneapolis and a couple of
15 communities just north and west of Minneapolis.

16 So, good evening. Before we get to the more
17 formal part of the program to take testimony and
18 everything from the folks that have signed up, we're
19 going to have a quick presentation from Nani Jacobson
20 from the project office.

21 (Per request, presentation not reported.)

22 MR. DUININCK: All right. Thank you, Nani.
23 Thanks for the presentation.

24 Before we get started, I just want to
25 recognize a few other folks who have joined us: One,

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1 Council Member, Steve Chavez, from Dakota County, and
2 Hennepin County Commissioner, Jan Callison. Thanks a
3 lot for being here, Jan, and for all your work on this
4 project.

5 Before we get started, I just want to just
6 mention a few, kind of, ground rules here. Tonight is
7 focused on the draft DEIS. There might be questions --
8 other questions related to the project, certainly, with
9 what's been in the news for the last couple months.
10 Please feel free to talk to our project office staff
11 about that and the council members and myself about
12 that after the meeting, but for the purpose of the
13 public hearing, it's to -- to comment specifically on
14 the supplemental draft environmental impact statement.

15 Individuals will have up to two minutes to
16 give their presentation; groups up to three minutes.
17 And I just ask that you state your name and address for
18 the record. I'll do my best to read the handwriting
19 and pronounce your name, so hopefully I -- as somebody
20 who has his name routinely butchered, I'll try to do my
21 best to pronounce everyone's names.

22 And I also just want to remind everyone that
23 if you're not interested in speaking tonight, you have
24 other ways to comment via e-mail and mail and certainly
25 with registering your comments with us here tonight in

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1 person. We did extend the public comment period 15
2 days to July 21st, so there still is just about a
3 month -- a little bit over a month to give comment.

4 So with that, we'll begin going through the
5 names. We've only had five people sign up tonight. So
6 I'm not going to be too strict of an enforcer on the
7 time, but we do want to respect everyone else's time
8 here who is here tonight.

9 Comment #85 So, first, we will hear from Bob Carney.

10 EP-01 MR. CARNEY: Thank you.

11 MR. DUININCK: You ready?

12 MR. CARNEY: Oh, yeah.

13 Bob "Again" Carney, Jr., Minneapolis,
14 Minnesota, 4232 Colfax Avenue South. Just by way of
15 disclosure, I'm a registered lobbyist for "We the
16 People," an informal association. I spoke yesterday.

17 Very briefly, first of all, the draft -- the
18 Supplemental Draft Environmental Impact Statement,
19 Section 5.2 says, "Remaining funding is assumed to come
20 from . . . the State, 10 percent."

21 Now, as -- as many know, at this point, the
22 State legislature cancelled \$30 million in
23 appropriation from 2013 for Southwest Light Rail. That
24 brings the total the State has put in to about
25 \$15 million.

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1 The current plan, as I understand it, is to
2 try to cut back from \$2 billion to \$1.65 billion.
3 Ten percent of \$1.65 billion is \$165 million, so the
4 State is \$150 million short at this point.

5 I talked with Speaker Daudt at the special
6 session. I asked him, "Is there any chance of the
7 legislature putting more money into Southwest Light
8 Rail next year?" He said, "No."

9 So unless money comes from somewhere else --
10 and my understanding is CTIB said they're not going to
11 go anywhere above 1.65; I don't know what Hennepin
12 County has said. Unless money comes from somewhere
13 else, there is a \$300 million shortfall in the dollars
14 available for the project.

15 In addition, I'm very concerned about the
16 idea of continuing to spend to get to the point where
17 you say, "Well, we have to do it now because we've
18 spent so much."

19 Now, the current reported number has been
20 \$59 million spent so far, but I have an e-mail from a
21 project engineer at Hennepin County who is working on
22 this. I asked him what the current spending for the
23 railroad authority has been, and he said \$34 million.
24 The number that I have from Met Council is
25 \$10.9 million.

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1 I'm showing, actually, the total spending is
2 closer to \$90 million, but my real concern is that when
3 you look at the amount that is scheduled to be
4 disbursed from CTIB this year and the amount that is
5 budgeted for Hennepin County and has not yet been
6 spent, we're looking at an additional \$67.3 million.

7 My real concern is that a very hard look
8 needs to be taken at whether we should simply freeze
9 spending at this point. This project is in such deep
10 trouble. It has been cut already so substantially in
11 terms of threatening viability, and now the money
12 available is -- is in such doubt that we simply need to
13 stop and take a look at whether we should simply put a
14 freeze and go back to the drawing board.

15 Thank you.

16 MR. DUININCK: Thank you.

17 Comment #86 The next speaker is Melitta Mayer.

18 EP-02 MS. MAYER: Hi, I'm a resident of Eden
19 Prairie, and I live at 13175 Spencer Sweet Pea Lane.

20 I am just going to keep this very short and
21 sweet. I am totally against the LRT project. I think
22 it's horribly costly, overly expensive, and we have a
23 great bus system. The Southwest bus system should be
24 expanded, made bigger and better. It's already in
25 place; there's nothing wrong with it. Why can't we

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1 just expand that and take whatever remaining money
2 there is, fix our roads and our bridges?

3 That's all I want to say. Thank you.

4 MR. DUININCK: All right. Thank you for your
5 comments.

6 Next speaker is Nancy Arieta.
7 Comment #87

8 MS. ARIETA: You want me real close?

EP-03

9 MR. DUININCK: Yes, that would be great.
10 Thanks.

11 MS. ARIETA: Thanks, everybody, for doing the
12 hard work. I appreciate the task; I don't appreciate
13 light rail. There's a lot of misgivings that I have;
14 one thing, in particular, is the cost. And I agree
15 with the last speaker, our bus system is fantastic.
16 I'm always in favor of that.

17 I also want to say the cost is horrendous,
18 and because we're being pushed by the knowledge of
19 federal dollars, and if we don't do this and we don't
20 do that, I hope I'm correct in saying that there's a
21 push and a shove behind all this.

22 As I understand, from what I heard speaking
23 to people, too, a lot of it was an agreement with
24 United Health that pulled a lot of this together, and I
25 didn't -- I didn't like that idea very much on that.

 Making us go forward with something may not

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1 be the best thing. Progress is not always good. As a
2 matter of fact, progress can also create a whole bunch
3 more dilemmas. I see the accidents happening on
4 University, the accidents on Hiawatha. I drive the
5 Hiawatha area frequently, and I see -- I just see the
6 mess that occurs a lot, and traffic tie-ups, snarls,
7 people being in -- in danger by trying to scurry across
8 things.

9 Anyway, I'm not for the light rail. My son
10 disagrees with me, but that's okay.

11 Thank you for hearing me.

12 MR. DUININCK: Thank you. Thank you very
13 much.

14 Comment #88 The next person is Ellen --

15 EP-04 MS. HOERLE: Hoerle.

16 MR. DUININCK: Hoerle. Thank you.

17 MS. HOERLE: Well, I wasn't sure what I was
18 going to speak about, and I still am not, so -- but I'm
19 here to support; I'm sorry. I am so thankful for you
20 guys, and I'm so thankful for this project. And I
21 don't commute, but I -- every time I try to get
22 downtown in the evening, and any time of day, anywhere,
23 it's a nightmare, and it's an hour to get downtown.

24 One day I -- okay. So we have two
25 representatives; we have David Hann, and we have

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1 Jenifer Loon. And both of them have been opposed to
2 any money, one penny being spent on light rail.

3 And after they had -- was it last year we had
4 a primary -- Republican Jennifer Loon was all about --
5 wonderful about how she supported the intersection
6 of -- the improvements of 494 and 169. And I had to go
7 downtown at about 5:00 in the afternoon, and as soon as
8 I went through that brand-new intersection, I ran into
9 a parking lot, because I was headed east on 494. It
10 took me an hour to get to downtown.

11 If my -- if I -- we had Southwest Light Rail,
12 my person I was picking up, he could have taken it from
13 the bus. And he could have taken it all the way out to
14 Eden Prairie, and I would have never had to go
15 anywhere. I spent an hour getting there and an hour
16 back. That's an hour of my time and my gas and
17 everything else.

18 It requires private investment on my part to
19 purchase a car to -- and that's what people don't
20 understand. They say, "Oh, the cost is so high," but
21 that's -- but you're getting a system. You're getting
22 a system where you can sit in a seat, and you can take
23 from Eden Prairie and go all the way to St. Paul. And
24 you can sit there and -- and do whatever you want,
25 so -- instead of having to spite traffic and, you know,

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1 ruin the environment and everything else.

2 So I am so supportive of this project, and so
3 I had -- once I heard everyone was against it, I'm
4 like, "I'm going to get up and speak."

5 The other thing is it's just so good for
6 everybody -- I mean, for this community. And it's just
7 going to create so many more options for people to get
8 out of this community in the evening and then for
9 people to come -- come here, you know, in the evening
10 and all of the wonderful things I've been -- you know,
11 with the Green Line and how the ridership is well
12 beyond projections.

13 I'm just -- I'm just here to support. So,
14 you've got my name, and so -- I live in Eden Prairie,
15 too. I forgot to say that part.

16 MR. DUININCK: Thank you. Thank you very
17 much for your comments.

18 Yeah, just a reminder, if you'd state your
19 name and address for the record.

20 Comment #89 Next is Joseph Lange [sic].

21 **EP-05** MR. LAMPE: Lampe, L-A-M-P-E.

22 MR. DUININCK: Oh, M-P. I'm sorry.

23 MR. LAMPE: I may not have printed that
24 clearly.

25 MR. DUININCK: No problem.

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1 MR. LAMPE: I'm here to try to save the
2 project.

3 MR. DUININCK: All right. Thank you.

4 MR. LAMPE: I have a 60-page submission of
5 exhibits. You will get one by mail. I didn't think to
6 bring yours; I wasn't sure you'd be here tonight. But
7 I can turn in this unaddressed blank.

8 This is quite a dramatic change to the
9 project, but it will save a lot of money and provide a
10 very superior experience for Eden Prairie. In terms of
11 environment impacts, think about no vibration or
12 acoustic noise, no buried cable ducts, no at-grade
13 street crossings or trail crossings, no pilings or
14 retaining walls --

15 AUDIENCE MEMBER: He's not -- I -- we don't
16 hear him.

17 MR. LAMPE: You're not hearing?

18 MR. DUININCK: A little closer, please.

19 MR. LAMPE: This thing is aimed low. I'll
20 try to kiss it; is that better?

21 AUDIENCE MEMBER: Yes.

22 MR. LAMPE: Thank you. These are all
23 environmental improvements that would result from the
24 plan that I'm turning in. No at-grade street or trail
25 crossings, no pilings or retaining walls, no overhead

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1 power catenary, no traction power substations, no
2 ongoing track and switch maintenance, no replacement of
3 poorly-compacted soils, no relocation of freight rail,
4 minimal utility relocations, almost no land
5 acquisition, trivial wetlands impacts and mitigation,
6 and minimal tree and brush removal.

7 It would take an hour to go through the
8 presentation and PowerPoint. I can't do that; you're
9 going to have to read the material.

10 Thank you.

11 MR. DUININCK: Thank you very much.

12 And the last person we have signed up so far
13 is Frank Lorenz.

14 EP-06 MR. LORENZ: Frank Lorenz; I live in Edina,
15 Minnesota.

16 I'm very much against light rail, in general,
17 and the SWLRT, in particular. One of the hidden costs,
18 regardless of whether you're going to be able to reduce
19 costs by \$341 million or not is what's going to follow
20 on as you start to make land acquisitions and actually
21 build the project.

22 I've attended a number of hearings, both at
23 the Metropolitan Council's committee meetings and at
24 the Hennepin County Board meetings. And I've watched
25 the biggest lawyers in town in their \$3,000 Italian

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1 silk suits waddle to the podium and make, essentially,
2 the same statements, "Although my clients are not
3 categorically opposed to the alignment," which means
4 the route, "At this time, we reserve the right to" --
5 and then they mumble something about a diminution of
6 value because of noise, access to their property, or
7 whatever, and then they sit down.

8 They have set their hook. It's well-known
9 that the wealthy, politically connected residents in
10 the Kenilworth corridor don't want light rail, and they
11 either are the biggest lawyers in town or have brunch
12 with them every Sunday.

13 So when you start to build this project,
14 there are going to be two of the most powerful groups
15 in the metro area with the deepest pockets, and they
16 are going to sue Met Council. And they are going to
17 win those lawsuits, and the residents in the Kenilworth
18 area will be given awards of about \$300 million because
19 their \$2 million houses will be worth only a million
20 dollars.

21 The other commercial property owners,
22 apartment buildings, office buildings, retail
23 buildings, will sue you for half a billion dollars, and
24 they will win those lawsuits because the case law is
25 perfectly clear. And so you can forget about the

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1 \$341 million problem that you say you have. Now,
2 excuse me, there are no problems in elitist Minnesota;
3 there are only challenges, so excuse me, the
4 \$341 million challenge.

5 When you get done with this a couple years
6 later, you're going to be on the hook for \$800 million,
7 and no penny of that will come from the federal
8 government. They aren't going to share your mistakes.
9 So the 900-pound gorilla at the end of the line,
10 wherever that ends up being, is going to be these
11 lawsuits. And you're going to lose them all, and then
12 the taxpayers of Minnesota are going to have to pay
13 every penny of this.

14 The other thing is that people in north
15 Minneapolis are being sold a complete bill of goods
16 that there are these huge, unfilled numbers of jobs in
17 Eden Prairie or the much-vaulted golden triangle, and
18 if only they can get quick access from north
19 Minneapolis to the western suburbs, their jobs problems
20 will be solved.

21 That's not true for two reasons: There is an
22 outpost of more than 9,500 recent immigrants to
23 Minnesota that live in supported housing in Eden
24 Prairie. There's no shortage of unskilled labor or
25 low-skilled labor in the area. The residents of

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1 Minneapolis-- North Minneapolis who unarguably need better
2 jobs are not going to find them at the end of the line
3 of SWLRT.

4 So this is a -- this is a bad idea. You have
5 a very good S -- Southwest bus system. You should use
6 it; you should let them buy double decker buses which
7 will cut the cost of operations in half. You should
8 encourage them to run on the shoulders of the roads.

9 But this is -- this is a project driven only
10 by the greed and egos of the elitist people who run the
11 unelected government called Met Council.

12 MR. DUININCK: All right. Thank you,
13 Mr. Lorenz.

14 There are no others who have currently signed
15 up, but in case anyone has joined us that is interested
16 in testifying, I'll just open it up for a moment;
17 otherwise, we will conclude our public hearing for the
18 evening.

19 Thanks, everyone, for being here. I think
20 I'll just reiterate a couple points: One, thank you
21 for your testimony. It all informs the public record
22 which will be addressed in the final DEIS, hopefully,
23 approximately a year from now, and if you have any
24 other additional substantive comments, you can leave
25 them via e-mail or via mail. We can provide you all

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1 with that information.

2 So thanks again for being here, and I'm sure
3 those of us in the front room and the folks in the
4 project office will stick around for a little bit. So
5 thanks again for coming. Have a good night.

6 (Proceedings concluded at 6:32 p.m.)

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A P P E A R A N C E S

Metropolitan Council:

Jennifer Munt
Edward Reynoso
Steve Elkins

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1 minutes. I ask that you state your name and address
2 for the record. If you're representing a group, please
3 identify the group as well as your name and -- and your
4 address.

5 We'll let you know when you have one minute
6 30 seconds and when your time is up. Sophia here has
7 got signs that she will show to you. To ensure that
8 everyone that wants to speak has an opportunity, I ask
9 that you respect the time limits and refrain from
10 applauding or cheering during the public hearing.

11 To help expedite the process, I'll call three
12 names at a time. If you're the second and third names,
13 please come forward so that you'll be ready to speak as
14 soon as the other person is done.

15 Before we begin taking public testimony
16 tonight, Nani Jacobson, who is the assistant director
17 of Environmental and Agreements at the Southwest
18 Project Office, she'll give us a 10 to 12 minute
19 overview of the supplemental DEIS. Welcome, Nani.
20 She's got a presentation right behind me.

21 (Per request, presentation not reported.)

22 MS. MUNT: Thank you, Nani.

23 I want to first recognize two elected
24 officials who have joined us tonight, Hennepin County
25 Commissioner Jan Callison and Hopkins City Councilman

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1 Gadd. They are both here to hear your comments.

2 Tonight we have got only two people signed up
3 to testify. First is Bob Carney, and second is Stuart
4 Nolan.

5 Comment #91^{Bob?}

6 HP-01 MR. CARNEY: Hi, I'm just curious: Are they
7 still on that -- still two-minute rule?

8 MS. MUNT: Two minutes.

9 MR. CARNEY: Two minutes. Okay. I guess
10 this is the two-minute warning.

11 The State has cancelled \$30 million that had
12 been appropriated for Southwest Light Rail. The total
13 that the State has appropriated so far now is down to
14 \$15 million. The supplemental -- the impact statement
15 says in section 5.2, "Remaining funding is assumed to
16 come from," and then dot, dot, dot, "the State
17 (10 percent)."

18 Now, you're talking about trying to cut back
19 to a \$1.65 billion budget; right now, it's at
20 \$2 billion. That's \$165 million for the State's
21 10 percent. And they've contributed \$15 million, so
22 there's 150 missing -- \$150 million missing.

23 I talked to Speaker Daudt at the special
24 session and asked him, "Is there any chance that the
25 legislature next year is going to put any more money

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1 into Southwest Light Rail?" He said, "No." I asked
2 him, "Is that on the record or off the record?" He
3 said, "I don't care."

4 So you need to realize that there is a
5 \$300 million shortfall in the amount of money that you
6 think is coming into this program. That's \$150 million
7 that the State is not going to do and another
8 \$150 million in federal match.

9 Now, the current reports show \$59 million
10 being spent on it. I've got an e-mail from a Hennepin
11 County project engineer who says that Hennepin County
12 Railroad has put \$34 million into it; their numbers
13 show \$10.9 million. I'm showing about \$90 million that
14 has been put in so far. I'm showing another sixty --
15 \$67.3 million scheduled to be disbursed or budgeted by
16 Hennepin County Railroad or CTIB for the rest of the
17 year.

18 This is just an outrageous process. The real
19 issue is we've got to freeze this thing before more
20 money is spent.

21 Thank you.

22 Comment #92 MS. MUNT: Next speaker is Stuart Nolan.

23 **HP-02** MR. NOLAN: Don't start the clock yet. I
24 haven't said a word. Can you pass those down, please?

25 Excuse me, I'm Stuart Nolan, Stuart

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1 Companies. Among others, we own just about 500 rental
2 housing units on either side of Hopkins and
3 Minnetonka -- and the City of Minnetonka. As -- as the
4 route comes south over the tracks, our properties begin
5 and extend south on either side (inaudible) Smetana.

6 We object to that route through the middle of
7 our properties and uprooting the lives of over a
8 thousand of our residences. And it damage -- the
9 damage to the environment, I won't harp on it, is
10 considerable with our wetlands and our wildlife and --
11 and trail.

12 We propose an alternate. Instead of going
13 through where the yellow is on the map I gave you, we
14 propose -- and this is -- this is a problem for some
15 people; to us, it makes a lot of sense. If the train
16 came up Excelsior Boulevard and turned south at 11th
17 Street instead of going up to 17th, and it connects to
18 the same point south where you can see.

19 When it does, it decreases the cost of the
20 train because it's -- it's shortening the route by 2100
21 and some feet; it reduces the travel time; it reduces
22 the impact to the environment; and it eliminates the
23 problem with the Hopkins Maintenance Facility because
24 it doesn't go up to 17th, it turns at 11th.

25 It's a straight route. It saves money, the

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1 environment, the maintenance facility, travel time, and
2 I think it deserves consideration and not just shoveled
3 under the map -- map because this is what some people
4 decided to push.

5 And I made it in two minutes.

6 MS. MUNT: Folks, is there anybody else who
7 would like to testify tonight? We've got two minutes
8 for individuals, three minutes for groups.

9 HP-03 AUDIENCE MEMBER: I have a question: What is
Comment #93
10 the total expenditure on Southwest Light Rail Transit
11 planning to this point?

12 MS. MUNT: Sam, could you help the lady with
13 an answer?

14 MS. O'CONNELL: Sure.

15 MS. MUNT: Thank you.

16 MS. O'CONNELL: So she asked in the group. I
17 don't know if you know right now, it's been about
18 \$62 million for the planning that we've been doing on
19 the engineering and the environmental study. So our
20 staff would be happy to answer any questions that you
21 have. We still have a lot of folks that are back in
22 the open house, so --

23 AUDIENCE MEMBER: Are you talking about
24 consultant fees or staff? Does that include staff?

25 MS. O'CONNELL: (Nods head.)

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1 AUDIENCE MEMBER: So \$62 million?

2 MS. MUNT: Folks, I'd also like to
3 acknowledge Mayor Gene Maxwell from the City of
4 Hopkins.

5 Anybody else want to testify? I think this
6 is the one of shortest public hearings we've ever had.
7 Well, I think what we'll do, folks, is folks at the
8 table will stick around for another 15 minutes; our
9 staff will stick around outside in the hall until 6:30.
10 If anybody changes their mind, we'll be right here to
11 hear your testimony.

12 HP-04 AUDIENCE MEMBER: As long as we're here.

Comment #94

13 MS. MUNT: Please.

14 AUDIENCE MEMBER: I just have a question
15 about the Kenilworth tunnel. I thought that that was
16 cancelled, and they were going to go over that track?

17 MS. MUNT: Folks, we've got questions about
18 the Kenilworth trail. Can Nani help explain that?

19 AUDIENCE MEMBER: I just thought I heard on
20 the news that the tunnel was cancelled and that it
21 would end up being an overhead rail, still using the
22 same track, just overhead.

23 MS. JACOBSON: Sure, I'll respond to that.
24 With respect to the document, in Section 3.4, it does
25 identify a tunnel in the Kenilworth. And that's still

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1 part of the current project, so we would welcome any
2 comments on the design in that line that does include a
3 tunnel in the Kenilworth.

4 AUDIENCE MEMBER: So what I heard on the news
5 is wrong?

6 MS. JACOBSON: I mean, the project is -- I'll
7 be happy to take you out in the lobby and show you that
8 particular section on that.

9 AUDIENCE MEMBER: I -- I guess I have another
10 question. How much -- what soft soil, sandy stuff for
11 what percentage of the line? Because I know there's
12 some in Eden Prairie and there's some in Minneapolis,
13 and certainly, there's some in Hopkins.

14 MS. MUNT: Nani, can you speak to the -- the
15 wet soil that may be encountered in both Eden Prairie
16 and in Hopkins?

17 AUDIENCE MEMBER: And Minneapolis.

18 MS. MUNT: And Minneapolis.

19 MS. JACOBSON: Certainly. We do have the --
20 we do have pretty minimal wetland packs in the three
21 areas that we have identified in SDEIS. I would
22 actually -- we have a board out there; it's at the end
23 of the hall. That's going to be the best way to answer
24 your question, and if there's not a staff person out
25 there, I can certainly come out and show you what --

1 where those wetlands are.

2 AUDIENCE MEMBER: I saw that. I just
3 wondered what percentage -- I know that the area of the
4 Kenilworth trail was not just wetland; it was a lake.
5 It was -- so it's filled in. Seems -- seems that the
6 land that's left is wetland. So, I mean, how much soil
7 stabilization?

8 MS. JACOBSON: There's a small amount of
9 wetland in that area, but not the -- not that much. I
10 think it's less than -- less than an acre along that
11 Kenilworth area. So we look -- we do a very thorough
12 analysis in the field, surveys to document the
13 vegetation and the wetland coverage. So we've done
14 that for the entire --

15 MS. MUNT: Anyone else wants to testify?
16 Okay. I have got us, right now, at 6:30. We'll hang
17 out here until 6:45, and if anybody changes their mind,
18 just step to the microphone. Let us know your name and
19 your address and the group you represent, if you're
20 here on behalf of a group.

21 (Proceedings concluded at 6:28 p.m.)

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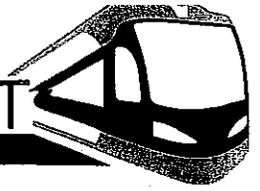
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Comment Card

Comment #95

SOUTHWEST

Green Line LRT Extension



Date 18 JUNE 15

Comment: TO MARK FUHRMANN.

(1) WHY AT A COST OF \$20M FOR A RAPID BUS FROM EDEN PRARIE WOULD YOU SPEND \$200M (20X) ON A RAIL SYSTEM. ALL THIS PROVES IS THAT STEEL WHEELS ARE NOT AFFORDABLE OVER RUBBER?

(2) WHY ^{WOULD} ~~DO~~ PEOPLE ONLY RIDE RAIL AND NOT BUSES ON THIS ROUTE?

MARK FUHRMANN

3) QUESTIONS FROM MARK FUHRMANN RESULTS FROM REPORT (REQUIRED) BY THE GOVERNOR ON THE COMPARISON BETWEEN RAIL AND ^{RAPID} BUSES FROM EDEN PRARIE TO MPLS

Support. John Shannah Cathers Spies

Rep Hornstein Safety along the Kennedyworth Trunk

Trains Steps for how along this track. High voltage lines and substations were done good.

MINNEAPOLIS MN 553

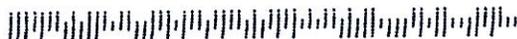
19 JUN 2015 PM 5 L



Southwest LRT Project office,
6465, Wayzata Blvd Suite 500,
St Louis Park,
MN. 55426

SDEIS Feedback

55426172699







HEARTLAND CORN PRODUCTS

July 2015

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

RE: Southwest Light Rail Transit

Dear Nani Jacobson,

Heartland Corn Products (“HCP”) is a farmer owned ethanol production cooperative in Winthrop MN that is located on and utilizes the Minnesota Prairie Line/Twin Cities & Western railroad (“MPL/TCW”). The MPL/TCW provides the vital transportation link to domestic and international markets for HCP ethanol and co product production. Any changes to the MPL/TCW route that increase costs and impact their ability to deliver goods safely and efficiently will have an adverse effect on HCP and its 900 farmer members.

As discussions continue regarding the construction of the Southwest Light Rail Transit, we want to have some assurance that serious consideration is given to the economic impact on the HCP farmer members. In addition to HCP, any negative impact on rail shipments will affect thousands of Minnesotans located along the MPL/TCW railroad line in ten counties and 40 plus communities across south central MN. This decision not only impacts the Metro corridors, but the economic well-being of a large swath of south central MN residents. Safe and efficient access to the global marketplace is critical to the survival of HCP and other shippers in this region.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Blumhoefer'.

Scott Blumhoefer

Vice President

Heartland Corn Products



HEARTLAND CORN PRODUCTS

53331 State Hwy. 19 • P.O. Box A
Winthrop, MN 55396

Hasler

07/01/2015

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FIRST-CLASS MAIL

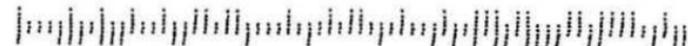
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ZIP 55396
011D10641891

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

55426\$1724 0019



M.2-197

Kadence Hampton

From: Matthew Pawlowski <matthew_pawlowski@yahoo.com>
Sent: Friday, June 19, 2015 7:41 PM
To: swlrt
Subject: opposition to SW Metro Rail

SW Metro Rail Transit,

I would like to voice my strong opposition to the SWLRT. The project is over 2 billion dollars and keeps rising. The Twin Cities metro plain and simple does not have the population and or population density to justify these dollars being spent. Buses and bus lanes are still the most effective dollars spent in our metro area.

Thank you,
Matthew Pawlowski
952-221-0819

Kadence Hampton

From: Markmcgree <markmcgree@gmail.com>
Sent: Tuesday, June 30, 2015 11:00 PM
To: swlrt
Subject: SW LRT ROUTE

I used to live in the Kenwood neighborhood and was a regular bus rider. I do not think I would walk to the current proposed corridor to ride the train. I would continue to ride the bus. Hence, I do not think that 21st station would pick up much ridership even if MTC stopped running a bus through Kenwood.

So, I have another route suggestion. I understand that Lake St is forecasted to be the busiest station. So run the train to there and then turn it North to run along Cedar Lake Pkwy until it meets the rail corridor just S of 394. This path catches Benilde HS and Jones-harrison traffic. This path eliminates the Kenwood corridor, the project biggest headache with its cost and environmental concerns.

If you rejected this alternate path, please refer me to documents that eliminated it.

I no longer live in Kenwood having moved to Bloomington after 10 years in Denver, where I rode the train to work.

Thanks for the attention.

Mark McGree
Markmcgree@gmail.com

Sent from my iPad

Kadence Hampton

From: Chris Polston <christopher.polston@yahoo.com>
Sent: Wednesday, July 01, 2015 1:43 PM
To: swlrt
Subject: Route question

With all the delays and cost overruns, why not discuss dropping it down Hennepin Ave again? I always wondered why it got routed past swamps and some of the lowest density/no businesses areas in the SW quarter of the city.

Case study: I live in Hopkins, want to take family to Uptown for shopping and dining. As it stands, I would have to walk kids or older relatives almost a mile just to get where we want to go. Most cities (Chicago, NYC, DC, Boston) have rail lines that get you where you want to be.

Case study: The bars let out. 200+ drunk 20-somethings stagger to the train station. This is the neighborhood that had hidden beach razed because of 'the elements' hanging out there.

And why wouldn't the Hennepin Ave businesses want an extra 12,000+ people going by their store every day? Or was that estimate 20,000?

Thanks,
Chris

Kadence Hampton

From: Irwin Spirn <ispirn1@gmail.com> on behalf of Irwin <ispirn@yahoo.com>
Sent: Monday, July 06, 2015 4:56 PM
To: swlrt
Cc: sophia.ginis@metro.transit.org
Subject: light rail expansion proposal

Dear Metro Transit,

My husband and I live in a beautiful place- Calhoun Isles, originally grain silos, located amidst the Chain of Lakes and the Greenways in Minneapolis. This scenic area is internationally admired for the urban beauty, parks, and bikeways.

This is threatened by the proposals for a Light Rail. We are terrified of this project and the damage it will cause. Here are some of the reasons:

*Vibrations during construction and operation. Do you know that so much shaking occurred during the start of construction at the building next door to us that work had to be stopped? Building a shallow tunnel in the sandy soil will be even worse.

*A tunnel will disturb the water table. How often will the water be pumped out? We know the building on the lagoon connecting Lake Calhoun and Lake of the Isles dumped water into the the lakes from their indoor garage. We shouldn't fool with the delicate water system here.

*Dangerous oil tank cars now travel on the tracks below us. Adding electric light rail on narrow spaces close to our building and next to the hikers and bicycle riders is an invitation for an explosive catastrophe. (Even more dangerous during construction). Light rail and hazardous freight should not mix!!!!

*Noise from the frequent trains will increase through a tunnel and get louder and louder as it rises to the top floors of our building.

*This natural sanctuary will be disturbed by trains running through it and by more cars with no place to park.

Please do what you can to stop the light rail construction next to the freight trains and within the Greenways. Please preserve the pride of Minneapolis - beautiful nature and urban bike and hiking trails!

Sincerely,
Marion Spirn

S

Kadence Hampton

From: Marion Collins <colli090@umn.edu>
Sent: Wednesday, July 08, 2015 4:53 PM
To: swlrt
Subject: Supplemental Draft Environmental Impact Statement

I urge all members of the Metropolitan Council, and all those pushing for this particular alignment of SWLRT, to please take a very thorough look at this statement and not dismiss the impacts that have been discovered. There are many impacts to pushing LRT through the beautiful parkland of the Kenilworth Corridor.

- water quality and safety
- soil toxins that can be brought to the surface if disturbed, such as arsenic
- vibration damage to condos and homes
- noise impact
- destruction of trees, newly restored prairies, and parkland

Please do not ignore these things. What if you lived here? What if the bike trails you use to commute, and the parkland you enjoy were about to be destroyed?

WHAT IF YOU AND YOUR CHILDREN WERE PLACED IN A BLAST ZONE? Please listen to your citizens and what we are saying.

I support LRT - done properly. Now the cost of this project is so high that we are cutting things left and right - just more and more broken promises to the people in Minneapolis this is already negatively affecting.

THERE IS NO ECONOMIC DEVELOPMENT to be found along the Kenilworth Corridor, no businesses to help, no commercial property to develop. And the plan to then take a lot of buses into a neighborhood of single family homes with lost of kids, where buses were already cut due to lack of ridership, increases cost even more and doesn't make any sense.

THIS ROUTE IS DANGEROUS, both to the environment and families like mine that live along this amazing natural setting. With the current alignment, this does not help low-income families - these families are found along another proposed route, that is now cheaper and makes more sense - through Uptown, where there are many businesses that need support and people that need public transit - and bus hubs that are already there!

Please do not make decisions based solely on money (or if you must decide on a cheaper route, then take a look again at the Uptown route which is now cheaper and makes much more sense). Please listen to the citizens who are going to be seriously impacted, in negative and dangerous ways, as shown by the environmental research that has been done. We have to live with your decision - so respect our voice. Would you like a mine buried in your backyard? Would you like your trees cut down? Would you like arsenic getting into your groundwater? Please think about your choices and the legacy you leave for future generations. Please consider the families you are putting in danger, all for money.

Sincerely,
Marion Collins

Kadence Hampton

From: Safety In the Park <safetyinthepark@gmail.com>
Sent: Friday, July 10, 2015 12:23 PM
To: swlrt
Cc: Jacobson, Nani
Subject: Comment for the SWLRT - DEIS
Attachments: SDEIS comment.docx

July 09, 2015

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 attached document is the official Safety in the Park Comment to the Supplemental Draft Environmental Impact Statement. Please add this four-page document to the comments for review by the FTA.

Thank you,

Jami LaPray and Thom Miller – Co-Chairs, Safety in the Park!

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safetyinthepark@gmail.com
Facebook-Safety in the Park!
www.safetyinthepark.com

SAFETY IN THE PARK!
RESPONSE TO THE SOUTHWEST LIGHT RAIL TRANSIT PROJECT
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT
STATEMENT (SDEIS)
JULY 9, 2015

This document constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit (SWLRT) Project published in the Federal Register on May 22, 2015. Note that this comment is post-marked before the published comment deadline of July 21, 2015.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which, while led by a steering committee of seven residents, represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed names on petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 450 participants. Safety in the Park is a not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN. Safety in the Park fully supports the SWLRT project as a whole, but rejects any proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. Members of this group have worked on the freight relocation issue since the mid-1990's. Early in 2010 we began a more concerted effort to be heard, holding numerous public meetings, meetings with elected officials, and other stakeholders. We spent untold hours learning about railroad engineering and the railroad business. We also found and consulted with pro-bono rail experts, to help us by double-checking our findings. We know that our understanding of the issues and impacts of this project are strong.

St. Louis Park/Minneapolis Segment:

While we agree with the final Supplemental Draft Environmental Impact Statement conclusion that Co-location of freight and Light rail (LRT) in the Kenilworth Corridor of Minneapolis is the only viable option for the Southwest Light Rail Transit project, Safety in the Park challenges the very nature of the Met Council's decision-making process. In a September 2, 2011 letter from the FTA the Met Council was given the mandate to evaluate both freight rail relocation and co-location for the SWLRT project. Safety in the Park representatives to the SWLRT Community Advisory Committee (CAC), asked for written documentation confirming the need to retain re-location options into perpetuity. Responses from Mark Fuhrmann, SWLRT project director, confirmed that no where in the September FTA letter does it say that both options have to be carried to the end.

Furthermore, there are no subsequent written documents giving that direction.

<http://metro council.org/METC/files/f8/f88ed9f2-a4a1-4190-b856-9bce04fbd003.pdf>

Had the Met Council applied the criteria used (the taking of property, cost, above ground structures, and community opposition) in the culling of options equally for both co-location and re-location options all of the relocation options would have been dismissed after the first round of evaluations. Brunswick Central, the relocation option held to the end, ranks higher on this scale of negative impacts than all of the co-location options, many of which were eliminated after that first evaluation. Table F.5-6 St. Lois Park/Minneapolis Segment Alignment Adjustment - Third Step Evaluation, as well as, all of the explanations of the decision process, leaves the reader with the impression that there are only two possibilities for freight as part of the SWLRT project. Furthermore, the cost given for Brunswick Central does not seem to include the ongoing operating subsidy the TC&W Railroad would need in order to accept rerouting their trains to the MN&S.

<http://metro council.org/METC/files/82/82d110c1-cd37-4842-b37e-21b001a76d9d.pdf>

This arbitrary and capricious evaluation by the Met Council in regard to re-location of freight continues to put the residents of St. Louis Park at risk.

Action Requested: At least one of the co-location options that do not involve tunnels should remain in the list of viable options and/or all relocation options should be removed from contention after the step one evaluation. Due to the signed 1998 City of Minneapolis agreement with the Hennepin County Regional Rail Authority (HCRRA) to move the bike trail when the Kenilworth Corridor is needed for transit the most likely option to retain would be relocation of the bike trail.

<http://www.safetyinthepark.com/uploads/1/5/9/9/15992878/kenilworthtrail.pdf>
[.pdf](#)

The Freight Rail and Light Rail “Swap” and “Southerly Connection.”

Safety in the Park, supporters believe that the SWLRT project needs to be built in such a way as to ensure its success. The case made in the SDEIS for the need for the Light Rail “swap” and the “Southerly Connection” in the Executive Summary (ES) page 11 and in Chapter 2 Alternatives Considered page 42 is very well done. Descriptions of short-term and construction impacts make it easy to understand the reasoning behind the expense of this addition. However, there are no significant descriptions of long-term impacts in Table ES-1 or anywhere else in the SDEIS.

While we understand the need for the “Swap” and “Southerly Connection”, Safety in the Park has grave concerns regarding the dearth of public meetings about this addition as well as lack of information about the long-term impacts the change in

design of freight rail infrastructure will have not only on St. Louis Park, but on the communities of Edina, Bloomington and Savage. The wye configuration that is being replaced by the Southerly Connection effectively limits the potential of the TC&W Railroad to grow their business south of St. Louis Park using the MN&S. Moving unit trains through the wye, while possible, would be both time consuming and economically unfeasible.

During the Project Management Team (PMT) meetings that took place in late 2010 to early 2011 in conjunction with the Environmental Assessment Worksheet (EAW) for the proposed freight re-route, representatives of the TC&W Railroad made it clear that they are looking forward to the opening of the expanded Panama Canal so that shipping grain on the Minnesota River to the Mississippi, the Gulf of Mexico then through the canal to Asia will make economic sense. Near the Southern end of the MN&S the TC&W Railroad is rebuilding the bridge over the Minnesota River. This will make it possible for the railroad to connect with grain elevators in Savage. <https://www.minneapolisfed.org/publications/fedgazette/the-little-railroads-that-could>

When the Southerly Connection from the Bass Lake Spur to the MN&S in St. Louis Park is completed, the TC&W railroad will have an uninterrupted route from Eastern South Dakota to the Minnesota River, making it possible for them to ship unit trains of grain, ethanol and other products through St. Louis Park to the Minnesota River.

With the probable change in business plan for the TC&W railroad, come long-term impacts that need to be addressed. These impacts include, but are not limited to the following:

- Noise - mitigation will be needed for the area around the Louisiana Station – a noise study needs to be done.
 - Diagram 2.5.5 from Chapter 2 of the SDEIS shows the Louisiana Station and lines showing the position of the Southerly Connection
 - The Bass Lake Spur and the MN&S are not at the same grade. The Southerly connection will be a ramp connecting the two rail lines
 - Trains going up and down the ramp will be louder than trains currently going straight through St. Louis Park on the Bass Lake Spur
- Grade Crossings – the impacts of long trains regularly blocking crossings needs to be studied
 - Enhancements of crossing arms and signals may be needed at small crossing
 - Impact to traffic and businesses just West of Miracle Mile could be significant
 - Grade crossings in Edina, Bloomington and Savage will be impacted – Those communities need to be informed of the potential impact
- How long will it take for the City of St. Louis Park to realize the loss of tax base due to the loss of property and businesses in the Skunk Hollow area?

Action Requested: An enhanced study of the long-term impacts and implications of the new rail corridor being created from Eastern South Dakota to the Minnesota River through with a vital Southerly Connection in St. Louis Park. Once a complete study of the new corridor is complete, public meetings need to be held to explain what can be done to mitigate the traffic, noise and other problems created by adding the Southerly Connection to the SWLRT Project.

Prepared by: Jami LaPray, Thom Miller and the Safety in the Park Steering Committee - July 8, 2015
Safety in the Park! – safetyinthepark@gmail.com

Kadence Hampton

From: Irene Elkins <ireneelkins@earthlink.net>
Sent: Tuesday, July 14, 2015 12:09 PM
To: swlrt
Subject: Comment on SWLRT SDEIS plan - concern about southern arm

To: Nani Jacobson, Project Manager:

I am very excited that the SWLRT project appears to be moving forward at last! However, I was most concerned to learn about related implications that I think most of those in my Brookside (and adjacent neighborhoods) are completely unaware of, but which could substantially affect livability in our neighborhoods.

From what I understand, the current SDEIS plan eliminates the switching wye in the Elmwood neighborhood and replaces it with a very expensive freight-rail bridge that offers trains a route south through Elmwood, Brookside, and Brooklawn neighborhoods, then through Edina and other southern suburbs. A new bridge would make it easy for freight trains, potentially in large numbers, to move through these communities. While this clearly represents a serious livability and property value concern for everyone in these middle-class neighborhoods, I consider it a potential safety concern as well. These old tracks, which were never intended to handle large trains, are EXTREMELY close to homes on my street - it is NOT a wide corridor at all. With a large increase in rail traffic and/or the size of trains moving through this area, the increasing likelihood and consequences of a derailment (especially if trains carrying volatile fuels would be moving through the area) would be awful for those living close to the tracks.

Instead of an expensive freight-rail bridge, would it be possible to look into the comparatively less expensive possibility of adding a light-rail bridge over the existing wye as an alternative solution? Regardless, I hope you and your colleagues will seriously reconsider anything that might impact these neighborhoods adversely. Otherwise, the Wooddale and Louisiana SWLRT stations nearby may end up with fewer customers, as people choose to move elsewhere.

I greatly appreciate your consideration of my concerns as you move forward with what must be a highly complex project.

Sincerely,

Irene Elkins
4175 Zarthan Ave. S.
St. Louis Park, MN 55416

Kadence Hampton

From: fritzvandover@gmail.com on behalf of Fritz Vandover <fritz@fritzvandover.com>
Sent: Tuesday, July 14, 2015 3:58 PM
To: swlrt
Subject: Comments on latest SDEIS

Hello Ms. Jacobson:

I wanted to send in commentary about the latest SDEIS for the SWLRT project. My main concerns and questions are in regards to the new southern connection that is potentially part of the SW Light Rail project.

I, my wife, and our two young kids live 90 feet from the MN&S tracks at W. 42nd St. and the tracks in the Brookside neighborhood. We realize that the market determines the frequency of trains and that FRA classification restricts the speed of those trains to 10mph. Would a new southern connect mean that the:

- 1) MN&S tracks would be upgraded from Class 1, with a maximum speed of 10 mph, to Class 2, with a maximum speed of 30mph, in order to accommodate a presumably greater daily volume of trains?;
- 2) safety (signals and arms) and noise mitigation (quiet zones) measures would be implemented at grade crossings along the MN&S?

My hope is that the MN&S will remain a Class 1 corridor, with that maximum of 10mph, and that safety and noise mitigation measures would be implemented in order to ease the potential increase in rail traffic that a new southern connection would facilitate.

Thank you.

Sincerely,
Fritz Vandover, Ph.D.
612-296-1665

Kadence Hampton

From: Elise Durbin <edurbin@eminnetonka.com>
Sent: Tuesday, July 14, 2015 1:29 PM
To: swlrt
Subject: SDEIS comments
Attachments: Other_SDEIS comments-City of Minnetonka v1_0.pdf

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

Elise Durbin, AICP
Community Development Supervisor

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



July 10, 2015

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

Re: Southwest LRT SDEIS Comments

Dear Ms. Jacobson:

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

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

Sincerely,

Julie Wischnack, AICP
Community Development Director

Enclosure

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

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

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

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

Kadence Hampton

From: Skoch203 <Skoch203@comcast.net>
Sent: Tuesday, July 14, 2015 10:48 AM
To: swlrt
Subject: St. Louis Park resident's concerns

Good morning. I understand that StLP is back on the SWLRT radar. I thought it was agreed to and written that StLP would never be subject to the same nonsense again? Doesn't that mean anything to anyone? Move the bike trail! It is still a lot easier and cost effective over the tearing down of homes, businesses, electrical station that powers 3 communities, etc. I believe there is an element of the haves and have nots once again. Classism at its finest. I thought that the RR was the be all end all judge and they said no to the STLP tear down!! This is ridiculous and outrageously frustrating. 3221 Sumter Ave South. Shea Koch.

Kadence Hampton

From: Susanne Wollman <sjw2847@gmail.com>
Sent: Tuesday, July 14, 2015 9:49 AM
To: swlrt
Subject: SWLRT remaining issues

I am concerned that when the Kenilworth tunnel is fully engineered, the cost could escalate to an unacceptable level and the only published remaining viable alternative is the SLP Freight Rail Re-route. As a St. Louis Park resident, I want to strongly request that the Met Council change this language to include those alternatives, such as moving the bike trail. The current SDEIS lists none of these alternatives as viable. In fact, as part of a documented agreement, Hennepin County and Minneapolis agreed that the bike trail, when originally created, would be “temporary” until the corridor was required for light rail. I fail to see why this agreed about temporary bike trail is NOT listed as a viable alternative, especially when it would impact less people.

Susanne Wollman
2847 Zarthan Ave South
St. Louis Park, MN 55416

From: [Neil Baker](#)
To: [swlrt](#)
Subject: Light Rail in St Louis Park
Date: Thursday, July 16, 2015 3:40:22 PM

Dear Ms. Jacobson,

I would like to make sure that an oversight or screw up in SDIES will be corrected and no longer remain either. It has been brought to my attention that the latest "Alternatives" for co-location of freight and light rail in the Kenilworth corridor has some serious flaws and omissions. In the middle of this process, you may recall that there were several alternatives to co-location of freight and light rail in the Kenilworth corridor (the now agreed-option featuring a tunnel for light rail). One option that was included previously but is no longer listed was simple: Move the bike trail out of the corridor.

Apparently the [current SDEIS](#) lists none of these alternatives as viable. The only published remaining viable alternative is the SLP Freight Rail Re-route. This alternative has been roundly criticized by hundreds of families in St Louis Park as it would send countless daily trains within @ 100 hundred feet of the condominium complex in which I and 77 other families live. It would also go within 20 feet of the public park directly in front of our building.

Why is this an issue. I understand the risk all the families of St. Louis Park is that when the Kenilworth tunnel is fully engineered, the cost could escalate to an unacceptable level and, according to the SDIES, that only published remaining viable alternative (SLP Freight Rail Re-route) would go into effect since all other alternatives have been removed.

Therefore I and my family strongly request that the Met Council change this language to include all previous alternatives, including possibly moving the bike trail. In fact, as part of a documented agreement, Hennepin County and Minneapolis agreed that the bike trail, when originally created, would be "temporary" until the corridor was required for light rail.

Please let me know how and when you plan to address this. I would like to be present at that meeting.

Neil Baker
1550 Zarthan Ave S #515
St Louis Park, MN 55416
c: 262.853.9606

From: [Kathleen Pekach](#)
To: [swlrt](#)
Cc: [Richard Weiblen](#)
Subject: Liberty Property Trust - OMF at Site 9A
Date: Friday, July 17, 2015 2:49:36 PM
Attachments: [Scan.pdf](#)

Attached, please find a copy of Liberty Property Trust's response to the proposed OMF at site 9A. Original to follow via US Mail.

Thank you,

Kathy Pekach
Marketing Assistant
Liberty Property Trust
O 952.947-1100 D 952.833.5263
10400 Viking Drive, Suite 130, Eden Prairie, MN 55344
kpekach@libertyproperty.com

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July 17, 2015

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

Re: Comments of Liberty Property Trust Regarding OMF to be Located at Site 9A

Dear Ms. Jacobson:

Liberty Property Trust is the owner of the developed industrial properties at 1515 Sixth Street South, and 1600 Fifth Street South, Hopkins Minnesota, which will be taken for the proposed Operations and Maintenance Facility (OMF), Site 9A, Hopkins K-Tel East. As a property owner that will suffer the loss of two important industrial investment properties, we are deeply concerned about how this taking will impact us. We have reviewed the SDEIS and have the following comments on that document.

1. OMF Site 9A Selection Evaluation:

Our review revealed that Site 9A was not part of the original DEIS review and was only added as part of the SDEIS process and not subject to the same site selection evaluation that was done during the DEIS review. We understand that as part of the SDEIS analysis for a preferred OMF site a four step process was conducted that initially identified approximately 30 sites and through each step dismissed potential sites until site 9A was the final selection.

It appears to us that SDEIS failed to fully or properly evaluate the OMF site (identified in the SDEIS as site 9A) against comparable sites that were also being considered. We believe that additional information should be provided that will explain why site 9A was preferred over a number of others.

2. A Total Taking of the Liberty Property for OMF at Site 9A is Required

The SDEIS under Section 3.3.1.2 Acquisitions and Displacement indicates that there will be a full taking of both our industrial properties within the site 9A footprint. Liberty Property Trust concurs that any taking must be a full taking of each property.

The SDEIS notes that land which is acquired for the SW/LRT Project but not fully used for the OMF may be considered a remnant parcel and sold. Liberty Property Trust has no interest in buying back a remnant piece and there should be no expectation that such remnants will have any



LIBERTY
PROPERTY
TRUST

material economic value to Liberty. Liberty has previously conveyed this same information to representatives of the Met Council.

Liberty Property Trust has been an active participant in the public process and planning of the SWLRT. We are supportive of the project but recognize that a number of our properties will be taken if the project goes forward. Our concerns regarding the SDEIS reflect our past comments on the DEIS regarding our properties in Hopkins, Minnetonka and Eden Prairie, adjacent the Golden Triangle Station. Our earlier DEIS comments are attached for your convenience.

Finally, if the project goes forward, it is essential that our industrial tenants are fully compensated for their relocation costs and are given sufficient lead time to plan and execute a complex industrial plant relocation.

Liberty Property Trust

Richard Weiblen
Vice President, Development.

From: [Wanda Lambert](#)
To: [swlrt](#)
Cc: [Mark Wegner](#); [Victor Meyers](#); [Tina Ryberg](#)
Subject: Response to SDEIS
Date: Friday, July 17, 2015 2:34:15 PM
Attachments: [07172015123552300.pdf](#)

Good Afternoon,
Please find for inclusion in the office record the response of Twin Cities & Western Railroad on the Metropolitan Council's Southwest Transitway Supplemental Draft Environmental Impact Statement. These comments are set forth in the attachment.

Kind Regards,

Wanda Lambert
Twin Cities & Western Railroad Company
Minnesota Prairie Line, Inc.
Sisseton Milbank Railroad Company
2925 12th Street E.
Glencoe, MN 55336
PH: 320-864-7234
www.tcwr.net

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TWIN CITIES & WESTERN RAILROAD COMPANY

2925 - 12th Street East
Glencoe, MN 55336
(320) 864-7200
FAX (320) 864-7220

July 17, 2015

VIA EMAIL AND U.S. MAIL

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

Re: Response to Metropolitan Council's Southwest Transitway Supplemental Draft
Environmental Impact Statement

Dear Ms. Jacobson:

Please find for inclusion in the office record the response of Twin Cities & Western Railroad on the Metropolitan Council's Southwest Transitway Supplemental Draft Environmental Impact Statement. These comments are set forth in the attached.

Thank you.

Sincerely,

Mark Wegner

President

Twin Cities & Western Railroad

Phone: 320-864-7204

Email: mwegner@tcwr.net

Website: www.tcwr.net

Enclosure

Twin Cities & Western Railroad Company Response to Metropolitan Council's Southwest Transitway Supplemental Draft Environmental Impact Statement

Twin Cities & Western Railroad Company (TC&W) responded to the Southwest Transitway Draft Environmental Impact Statement (DEIS) in December 2012, and the issues raised in that response remain valid for this response. TC&W's response to the DEIS can be found at <http://tcwr.net/responsetodeis/>.

TC&W's comments should be viewed in the context that TC&W serves numerous Counties, Communities and Customers in south central Minnesota and South Dakota. Over the last 10 years our shippers and their customers have collectively invested over \$100 million in expanding and enhancing their freight rail facilities, creating additional jobs and economic growth in the area of rural Minnesota served by TC&W. These businesses have made these massive investments based on the understanding that their freight rail service will, at minimum, remain at its current level. This is a fair and reasonable understanding, given the protective mandate of the United States Surface Transportation Board (STB), which has exclusive jurisdiction over freight railroad transportation, including economics and service levels. Our response to the SDEIS, therefore, is made with the purpose of preserving TC&W's ability to continue to provide freight transportation economically and at current service levels.

Changes in Scope/Elements

There are two changes in scope/elements from the October 2012 DEIS to the May 2015 SDEIS that affect TC&W.

- **Freight Route:** The SDEIS avoids the relocation of freight traffic traversing north on the CP MN&S line (from a point in St. Louis Park just east of Louisiana Avenue), and instead continues freight traffic traversing north via the Kenilworth Corridor (at Cedar Lake Junction just west of downtown Minneapolis). This results in a co-location of freight trains and light rail between these points and through the Kenilworth Corridor (co-location was planned from approximately Shady Oak Road in Hopkins to the point in St. Louis Park just east of Louisiana Avenue in both the DEIS and the SDEIS). TC&W will refer to this change as "Co-locate" within this document.
- **Freight Alignment Change:** The SDEIS contemplates moving the SWLRT from the north side of the existing freight rail to the south side of the future freight rail location, by shifting the freight rail to the current bike trail alignment by angling the freight rail north, just east of 169, and building a bridge to carry the LRT from north of the freight rail to south of the freight rail just east of Hopkins. TC&W will refer to this change as "Alignment Change" within this document.

Comments Related to above Scope/Element Changes

Freight Route – Service Disruption during Construction:

TC&W staff and consultants worked diligently with Met Council's staff and consultants from January 2013 until present to arrive at a plan that would retain the freight service south central Minnesota depends on, while at the same time preserving the "Locally Preferred Alternative" (LPA) for the Southwest Transitway.

There have been extensive documentation and discussion of the engineering and construction challenges of building the SWLRT in the Kenilworth Corridor from the point southwest of the lagoon connecting Cedar Lake to Lake of the Isles to the point where the LRT's Lake Street station is planned. It is TC&W's understanding that with the SDEIS, the SWLRT is at the approximately 30% engineering phase. The discussions with Met Council and staff have occurred with the understanding that TC&W will allow the SWLRT contractors to work during the day and the freight trains will be able to operate safely from the close of the SWLRT construction day until the beginning of the following construction day. This will delay freight rail, but with careful planning, managing and communication it can be done. It has also been noted at the 30% engineering phase that the bridge swap at State Highway 100 would create a significant service outage for TC&W customers. Having TC&W cease operations during construction for periods longer than the work windows described above would be disruptive to TC&W's service obligation that its customers rely upon.

Freight Route – Safety & Public Perception:

Our comment is made in the context that freight railroad operations are largely a mystery to the general public. They get noticed if the motorists must stop at a railroad crossing for a train, or a derailment makes the news, but otherwise the general public has little knowledge of freight railroads. Unfortunately, public perceptions of freight rail service are colored by highly publicized but relatively isolated incidents such as the ignition of flammable Bakken crude oil that occurred when a train derailed and ruptured in December 2013 in eastern North Dakota. Most Minnesotans do not know that 99.999997% of freight rail shipments arrive safely at their destinations.

Given the public's current perception of freight rail (particularly the safety of freight rail), it is important that Met Council communicate with the affected neighborhoods not only the safety precautions built into the construction plan, but also any contingency plans should a natural disaster occur during construction (wind storm, rain, deluge, etc.). Also, an emergency response plan ought to be part of the construction plan and this should be communicated to the affected neighborhoods and public officials.

Freight Alignment Change – Cost cutting options affecting TC&W:

Our comment is made in the context of the announcement in April 2015 that the costs of the SWLRT, as shown in this SDEIS had increased to approximately \$2 billion. The reaction by elected officials and decision-makers, since that announcement, has been to cut the costs of the SWLRT to approach the earlier \$1.6 billion estimate.

In comments relating to the Alignment Change, the SDEIS discusses, as a result of the Alignment Change, the elimination of the side tracks that TC&W currently uses for sorting freight and staging freight cars. The SDEIS does not mention building replacement track capacity at a location further west along the TC&W. Replacement track capacity must be built by Met Council as part of the cost of the SWLRT project in order to meet Federal STB requirements and preserve the existing shipper service levels provided by TC&W to its customers. The expense of providing replacement track capacity must be factored into the project, and cannot be included in the cost cutting being considered by the Met Council. It should also be noted that severing the southerly connection from the CP Bass Lake Spur to the CP MN&S is not a cost cutting option as this connection provides freight rail access for grain producers in south central Minnesota to move their product to the river barge terminals located in Savage, MN.

Conclusion

TC&W remains committed to providing safe, efficient and reliable freight service to its south central Minnesota customers, as well as providing safe passage through the neighborhoods in the Twin Cities metropolitan area in which we operate. As planning moves towards 90% engineering, within the context of cost cutting, the safe passage of freight during and after SWLRT construction and effective and continuous operations must not be compromised.

Attached is a list of the Cities, Counties and Customers that provided letters of support of TC&W's response to the DEIS (<http://tcwr.net/responsetodeis/>). All of these constituents remain extremely interested in the SWLRT process with respect to the preservation of their freight rail service.

List of entities that responded to the DEIS in support of TC&W's response

ADM – Benson Quinn (Minneapolis, MN)
Agri-Trading (Hutchinson, MN)
Bird Island Bean Co, LLC (Bird Island, MN)
Bird Island Soil Service Center (Bird Island, MN)
Central Bi-Products (Redwood Falls, MN)
Clifton Co-op Farmers Elevator Association (Clinton, MN)
Cloud Peak Energy Resources, LLC (Decker, MN; Broomfield, CO)
Co-op Country Farmers Elevator (Renville, MN)
Corona Grain & Feed (Corona, SD)
Dairy Farmers of America (Winthrop, MN)
Equity Elevator & Trading Company (Wood Lake, MN)
Farmers Co-operative Elevator Co. (Hanley Falls, MN)
Farmers Union Coop Oil Company (Montevideo, MN)
Farmers Cooperative Oil & Fertilizer (Echo, MN)
FGDI (St. Louis Park, MN)
Form-A-Feed, Inc. (Stewart, MN)
Glacial Plains Cooperative (Murdock, MN)
Granite Falls Energy, LLC (Granite Falls, MN)
Hanley Falls Farmers Elevator (Hanley Falls, MN)
Heartland Corn Products (Winthrop, MN)
L.G. Everist, Inc. (Sioux Falls, SD)
Lyman Lumber Company (Excelsior, MN)
Meadowland Farmers Coop (Lamberton, MN)
Midwest Asphalt Corporation (Hopkins, MN)
Minnesota Grain & Feed Association (Eagan, MN)
Minnesota Valley Regional Rail Coalition
Mosaic Company (Savage, MN)
RPMG Inc. (Shakopee, MN)
Seneca Foods Corporation (Glencoe, MN)
Seneca Foods Plant (Arlington, MN)
South Central Grain & Energy (Fairfax, MN; Gibbon, MN; Hector, MN; Buffalo Lake, MN)
Southern Minnesota Beet Sugar Cooperative (Renville, MN)
Step Saver, Inc. (Redwood Falls, MN)
United Farmers Cooperative (Winthrop, MN)
Western Consolidated Cooperative (Holloway, MN)
Western Co-op Transport Association (Montevideo, MN)
Wheaton Dumont Co-op Elevator (Wheaton, MN)
United Grain Systems, LLC (Winthrop, MN)

City of Arlington
City of Bird Island
City of Buffalo Lake

City of Glencoe
City of Hector
City of Milan
City of Montevideo
City of Morton
City of Norwood Young America
City of Olivia
City of Plato
City of Sacred Heart
City of Stewart
City of Winthrop

Big Stone County
Carver County
Grant County (South Dakota)
McLeod County
Minnesota Valley Regional Rail Authority
Redwood Area Development Corporation
Redwood County
Upper Minnesota Valley Regional Development Commission
Renville County
Renville County HRA/EDA
Roberts County
MinnRail, Inc.
Sibley County Economic Development Commission
Sibley County Auditor
Sibley County
Sibley County Attorney
Wright County
Yellow Medicine County

From: [John Erickson](#)
To: [swlrt](#)
Cc: [Ginis, Sophia](#)
Subject: SDEIS Response
Date: Friday, July 17, 2015 1:41:35 PM

July 17, 2015

RE: Supplemental Draft Environmental Impact Statement Comments

To whom it may concern:

On behalf of the elected Board of Directors of the Cedar Lake Shores Townhome Association (CLSTA), we are responding to the Supplemental Draft Environmental Impact Statement (SDEIS) issued for the Southwest LRT project. Our association is comprised of fifty-seven homeowners and we are located immediately to the west/north of the freight rail tracks between the Lake St. bridge and Cedar Lake Parkway (also known as the pinch point of the proposed fifteen plus miles SWLRT line). We have both concerns and comments about this document that we believe need to be addressed and considered in order to protect our homes and neighborhood should this transportation project be approved and funded. In the following paragraphs and with appropriate reference to the SDEIS document, we will highlight our concerns or comments.

Light Rail Tunnel

We continue to strongly support the building of this tunnel from just north of the Lake St. bridge to north of Cedar Lake Parkway (p. 2-52). This is the singularly most important change from the original DEIS and the only recommended solution that provides for the maintenance of our immediate neighborhood and our homes as well as the continuation of the current trails, freight rail traffic and LRT development in the Kenilworth corridor portion of the proposed LRT route. We also need to add that in addition to the challenges during the construction phase of the tunnel for all of our homeowners, particular attention will need to be given to vibration, noise, bell and light mitigation for those homes immediately adjacent to the SWLRT tunnel entrance.

Freight Rail

In order to build the LRT tunnel in the Kenilworth corridor, freight trains will have to be temporarily moved closer to our homes. The SDEIS states that this movement will last for approximately one week (section 3.196). The SDEIS also states that the freight rail speed of 10 mph or less will be maintained during construction and beyond (Table 3.1-4). We want to strongly support both of these plans as they will greatly enhance safety for workers and residents, reduce the need to remove vegetation and trees on our property and ultimately

make the construction phase more tolerable.

Vibration

Ground Borne Noise (reradiated noise from ceilings and walls) is one of the issues noted in the SDEIS that will have impacts on our homes (3.4-14, p.3-187). Specifically, three unidentified impacts on our townhomes are noted and there are references to "vehicle source input characteristics". As we do not feel we currently know enough about this expected effect and what can be done to mitigate it, we need additional engagement about this issue. Until that occurs, we have very serious concerns about what this means for our association.

Noise

Station related bells will produce a very intrusive noise to nearby homes and neighborhoods (88dBA according to Appendix H-5). We know this is a standard issue in LRT operations. What we don't know is whether the specific design for the West Lake Street station and surrounding immediate area can be adjusted or whether there are any available mitigation strategies to reduce these decibel levels. We strongly urge that creative design efforts be employed to address this old but continuing serious problem in LRT operations.

Visual Quality and Aesthetics

The SDEIS states that the overall impact of the LRT development near us is "substantial" as it relates to these important considerations (Section 3.167). It also notes that "..the Council will consider mitigation measures for visual quality impacts that are deemed substantial..." (p. 3-168). We are requesting that whatever can be done to preserve the current natural world ambience of this portion of the corridor be implemented. Also, we have a unique problem related to LRT lights at night. Because of the LRT track curvature going downtown out of the West Lake Street station into the tunnel entrance, certain townhomes in our association may be lit up. We believe that possibility can be mitigated by placing something on top of the rail crash wall. We strongly urge the design team to look at this problem and create a reasonable solution.

Closing

Thank you for both the opportunity to read and respond to the SDEIS. We sincerely hope that our concerns expressed in this memorandum are addressed in the final design. If we can be of any assistance in achieving that goal, please don't hesitate to contact us.

Sincerely,

Richard Johnson, President CLSTA Dickatcls@aol.com

John Erickson, Vice President CLSTA eldonjohn@hotmail.com

From: [Tom Cremons](#)
To: [swlrt](#)
Subject: SWLRT SDEIS comments
Date: Friday, July 17, 2015 8:29:47 AM
Attachments: [2015 July sdeis comments.doc](#)

Attached is a letter commenting on the recently released SWLRT SDEIS for inclusion in the record.

Thomas P. Cremons
3035 Brunswick Ave. S
St. Louis Park, MN 55416
July 17, 2015

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

To Whom It May Concern:

I would like to take this opportunity to comment on the recently released supplemental DEIS for the Southwest LRT project.

My primary concerns with the document lie in three specific areas:

The first is the description of the process for selecting option 3A, specifically relating to citizen input. In the process of selecting this alternative, the objections of the residents of the affected neighborhoods in Minneapolis as well as the objections of the City of Minneapolis itself were discounted. The consent of these entities was granted, with great reluctance, only after they had been promised, or thought they had been promised, that freight rail would be removed from the Kenilworth corridor. At the same time, citizens of St. Louis Park who would be impacted by the freight rail reroute were being told that freight relocation was a separate project and that neither their concerns nor the additional costs associated with moving the freight traffic would be considered as part of the route selection process. The lack of openness in dealing with the freight issue distorted the process which resulted in the selection of option 3A. The reality that these issues and the concerns of the affected communities were not dealt with in an open, honest manner has poisoned this project from the beginning, causing years of delays and tens of millions of dollars of extra expenditures.

My second concern is the retention of the “Brunswick Central” plan as an option for dealing with the freight problem. All of the freight relocation options, including “Brunswick Central” have encountered strong opposition in St. Louis Park due to concerns about safety, community cohesion, noise, sound and air pollution, impacts to the school system, and livability issues for those living near the tracks. In fact, the “Brunswick Central” option is among the most expensive of all the options considered and requires the taking of more property than most of the other options. Co-location of freight and LRT at grade in the Kenilworth corridor, by relocating the trail, is far less expensive and requires the taking of little or no property. In fact, the land on which the trail was built was acquired by the Hennepin County Regional Railroad Authority specifically for future transit needs and the lease between the HCRRA and the City of

Minneapolis specifies that the trail is to be abandoned if the land is needed for transit development. By any objective criteria, the at grade co-location option should have been retained and the “Brunswick Central” option should have been discarded.

Finally, I am concerned about the lack of study and citizen input regarding the “southern connection” between the Bass Lake Spur and the MN&S. This is a very expensive, unnecessary and potentially destructive feature in a project that is grossly over budget before one shovel of dirt has been turned. Businesses will be removed and jobs will be lost to construct this connection. The construction of this direct connection between the Bass Lake Spur and the MN&S will greatly increase the efficiency, ability and likelihood of the railroads to run more frequent and longer trains, possibly including 100 plus car unit trains from the eastbound Bass Lake Spur onto the southbound MN&S as well as in the opposite direction. This has the potential to cause major traffic problems as well as noise, safety, pollution and neighborhood livability issues in St. Louis Park as well as communities to the south, all the way to the Minnesota River. To my knowledge, little or no study has been done regarding these impacts, nor have these communities been truly informed of the implications or given a chance to respond. As with many issues in the past, these impacts will be a direct result of the SWLRT project but are not being adequately considered.

I strongly believe in transit and in the need for better transit options for the southwest metro area. If the route selection and planning process for SWLRT had been truly open, honest, objective and comprehensive, the project would probably be have been completed by now at a reasonable cost and we would now be riding on it. Because the process was flawed from the beginning, millions of dollars have been wasted, not one rail has been laid and the budget has doubled with no end in sight. Continuing to follow the same flawed path will, I fear, only lead to more delays, more expenses and, possibly, the death of the SWLRT project.

Sincerely,

Tom Cremons

From: CDeJarlais@bachmans.com
To: [swlrt](#)
Cc: DBachman@bachmans.com
Subject: SWLRT SDEIS
Date: Friday, July 17, 2015 9:58:52 AM
Attachments: [SWLRT SDEIS from Dale Bachman 071715.pdf](#)
[pic13261.jpg](#)

Good morning,

Attached is a letter from Dale Bachman, Chairman/CEO of Bachman's, Inc., expressing comments relative to the SWLRT SDEIS.

As indicated on the document, we have also sent the original of this letter to Ms. Nani Jacobson via US Mail; we elected to send it via email, as well, as the deadline for comments of July 21, is fast approaching.

Thank you,
Cherie DeJarlais

(See attached file: SWLRT SDEIS from Dale Bachman 071715.pdf)

Cherie DeJarlais
Bachman's Executive Offices
Phone: 612-861-7691
Fax: 612-861-7745

(Embedded image moved to file: pic13261.jpg)

July 17, 2015

SENT VIA US MAIL and EMAIL

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

Dear Ms. Jacobson:

The purpose of this letter is to provide comments for Bachman's, Inc. and its Eden Prairie location, 770 Prairie Center Drive, on the SWLRT Supplemental Draft Environmental Impact Statement (SDEIS).

Chapter 2: Alternative Considered:

All of the rail alignments recommended in the original DEIS showed the SWLRT line along Technology Drive. This reasonably demonstrates that the preferred route and the route best suited for the SWLRT is along Technology Drive. We understand the SDEIS was authorized to review this alignment based on political requests by the City of Eden Prairie and a few impacted businesses. However, it must be assumed that Technology Drive is the most advantageous alignment for the efficient operation of the rail corridor as originally concluded. If the line could be located on the north side of Technology Drive the objections of those businesses could be resolved. Moving the line from Technology Drive will do the following:

- Lengthen travel times
- Impact more businesses
- Impact more roads and intersections
- Require the construction of a new road
- Require crossing more intersections
- Create more safety risks

We appreciate the fact that the at-grade alignment along Singletree and Prairie Center Drive is not being considered. We have significant concerns about that alignment for safety reasons and negative access impacts on our property. We prefer a north side of Technology Drive alignment to the proposed alignment along the steep slope between Bachman's and Costco.

Ms. Nani Jacobson
Metro-Transit-Southwest LRT Project
July 17, 2015

Chapter 3.2 Eden Prairie Segment, Wetlands:

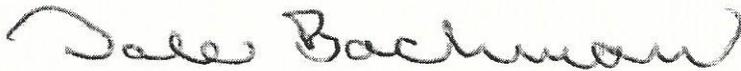
We have concern about the impact to the steep slope and the Costco stormwater pond/wetland along the north side of our site. The impact of grading is not addressed adequately in the SDEIS. We would request the Project Office to provide grading plans as they become available to ensure that the grading of the steep slope does not negatively impact our property. In addition the SDEIS notes that the Costco stormwater pond/wetland will be impacted. We are concerned about the potential impact that may occur with the removal/replacement of the Costco pond. Additional information must be provided on how and where the stormwater pond will be replaced.

Chapter 3.2 Eden Prairie Segment, Acquisitions:

The Construction Plans available on the Project Office website show the project will need a temporary construction easement along the north side of our property. The proposed easement is shown to come up against our north wall and within our parking, loading dock, and storage areas. We require more information on the length and impact of the construction work on our store operations. We must not lose access to our only loading dock. Losing access to our only loading dock would have significant negative impact on our business operations.

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

Sincerely,



Dale L. Bachman
Chairman / Chief Executive Officer

DLB:cad

From: [Diane Hedges](#)
To: [swlrt](#); Anne@AnneMavity.org
Subject: SW Light Rail Freight Bridge
Date: Friday, July 17, 2015 10:20:10 PM

I just read an e-mail from Irene Elkins in the Nextdoor Brookside. She said:

I was concerned to learn about an issue that I suspect most residents in my Brookside (and other neighborhoods south of Excelsior and west of 100) may be unaware of that could potentially adversely affect our neighborhoods. According to Safety in the Park, the current SDEIS plan (part of Southwest light rail planning) eliminates the freight rail switching wye in the Elmwood neighborhood, replacing it with a very expensive freight-rail bridge, offering freight trains a route south through the Elmwood, Brookside, and Brooklawn neighborhoods, through Edina's Todd Park neighborhood, etc.. This new bridge would make it easy for freight trains, potentially in large numbers, to move through these communities. While this may benefit the railroads, as taxpayers, we would be paying for something that would negatively impact livability - and likely property values- in our neighborhoods. I would therefore encourage similarly concerned residents to contact our SLP City Council to support the comparatively less-expensive possibility of adding a light-rail bridge over the wye (which would allow the SWLRT project to proceed) or at the very least, to advocate that money for mitigation should be set aside to offset the livability issues. If concerned, please contact Ms. Nani Jacobson, Project Manager, at SWLRT@metrotransit.org, as well as to ask our City Council to speak out in their official comment. The deadline for commenting is July 21, 2015. City Council members e-mails are available on the following website: <http://www.stlouispark.org/contact-infor...> (Scroll down until you get to Mayor Jacobs e-mail, followed by those of other City Council members). Thanks!

If this is the case, I would be very opposed to the expensive freight-rail bridge. I live on Brookside and the train runs right next to my house and Jackley Park. I'd hate to see and hear more trains than we already deal with.

Diane Hedges

From: [Anna](#)
To: [swlr](#)
Subject: Considerations
Date: Sunday, July 19, 2015 3:47:28 PM

Greetings- I understand there is still a small chance the bike trail may be replaced bY the new light rail by the kenwood area . Is there any consideration for a multi level track/path? Rail on lower level and bike rail on top? Share the space. Doesn't that seem to be a viable option?

Thank you,

Anna Mulfinger
St. Louis Park

Please excuse typos
Sent from my iPhone

From: [Angie Erdrich/Sandeep Patel](#)
To: [swlrt](#)
Subject: SDEIS- One Citizen Response
Date: Sunday, July 19, 2015 6:14:41 PM

The SDEIS fails to adequately study safety and environmental impacts, especially in two areas:

1. Temporary freight (what we have now) should not be considered an existing condition. All visual, noise, vibration, safety and other environmental impacts should be measured from a basis of no freight and no light rail.
2. The SDEIS does not address the safety of co-locating freight trains (which presently carry hazardous materials like anhydrous ammonia and ethanol) through what is now going to be a very narrow pinch point. These hazardous trains will now be squeezed in next to homes, parks, trails, passenger trains, and electrical wires...all located between two lakes. Ethanol spills/explosions carry across bodies of water. These issues are not addressed in the current SDEIS.

I oppose this SWLRT route. I have written and participated in your processes and have given feedback to the Met Council and numerous politicians over the past two years. I have done everything my time allowed to fight this route and co-location. I am currently drafting a public apology to future generations to be signed by as many neighbors as I can get. I would LOVE to be on the wrong side of history on this one but if not, at least I can say that I tried my best to fight this and I will continue to fight it.

Angela Erdrich, MD
2217 Oliver Ave S
Minneapolis, MN 55405

Home: (612) 377-5632
Angie Cell: (612) 516-6866

Lebold, BillieJo

From: Jeanette Colby <colbyjeanette@gmail.com>
Sent: Sunday, July 19, 2015 11:02 PM
To: swlrt
Subject: Comments on the 2015 Supplementary DEIS

Dear Southwest Project Office Team,

Please find attached my personal comments on the 2015 Supplementary Draft Environmental Impact Statement.

Regards,

Jeanette Colby



[Comments on the SW LRT SDEIS.docx](#)

Comments on the Southwest LRT Supplementary Draft Environmental Impact Statement July 20, 2015

Submitted by Jeanette Colby
2218 Sheridan Ave South, Minneapolis

To the Metropolitan Council:

As you know, the process that led us to the Supplementary DEIS for the SWLRT has been riddled with political and technical problems and, sadly, the 2015 SDEIS continues in this vein.

In addition to downplaying or ignoring critical environmental issues with the latest iteration of LRT in the Kenilworth Corridor, it completely overlooks the fact that the temporary freight rail is being transformed into permanent infrastructure.

I will comment here on just a few of the most pressing specific issues:

1) Visual Impacts will be substantial throughout the Kenilworth Corridor



The Kenilworth Trail, where open green space and trees are highly valued

The 2012 DEIS correctly stated that SWLRT visual impacts would be substantial throughout the corridor. This statement included the premise that freight rail would be removed. Now, the

2015 SDEIS states that only about half of the corridor will be substantially impacted by the introduction of LRT and its infrastructure, as well as the introduction of permanent freight rail and its infrastructure. The SDEIS deems the area north of the Burnham Bridge as “not substantially impacted.”

Regardless of the methodology used (and well-articulated in the SDEIS attachments), this is an absurd statement. Freight and LRT tracks, overhead catenaries, 220 daily LRT trains, and an increasing number of freight trains will replace open space, green space and trees. It should be clear to anyone who has walked, bicycled, or otherwise found peace and recreation in the beauty of the Kenilworth Corridor that the visual impact throughout the corridor will be substantial and must receive the highest, most thoughtful level of mitigation.

Also absurd is the idea that an LRT station would be a positive visual addition to the area at 21st Street, currently a green space at the edge of Cedar Lake Park. Even with the smallest of the proposed station types, the replacement of trees with metal, wires, cement, and fencing will clearly have a negative visual impact in this park-like environment.



A station on University Avenue: A harsh built structure would replace natural elements at 21st Street

2) Noise impacts are underestimated in the SDEIS

The Kenilworth Corridor is quiet. When I'm working in my yard, I can often hear trail users conversing. Last summer, I heard a cyclist fall hard and was able to call 911.

Adding 220 LRT trains per day to this quiet, tree-lined recreational and bicycle commuting trail area will be a major environmental disruption, critically increasing noise even if moving LRT trains were the only noise source. However, train braking, crossing and station bells, mechanized announcements, and other activity at the proposed 21st Street Station will add to the noise impact. The corridor will be permanently changed from a uniquely tranquil area to one in which many neighborhood residents – not just those few in properties identified in the SDEIS – will have only two hours (between 2:00 a.m. and 4:00 a.m.) of uninterrupted quiet. This impact is substantially worse with co-location at grade, with freight bringing its own set of noise impacts.

The 2012 DEIS identified 96 moderate and 406 severe neighborhood noise impacts with co-location at grade between the proposed West Lake station and the proposed Penn Avenue station. More specifically, between 21st Street and Penn Avenue the DEIS identified 67 moderate noise impacts and 7 severe impacts with co-location at grade. The 2015 SDEIS, however, says there would be only 28 moderate and two severe impacts in all of Kenilworth with LRT and freight rail co-location at grade. The SDEIS states that the tunnel will address many noise impacts, especially on the adjacent townhouses and condos south of Cedar Lake Parkway. However, north of the Kenilworth channel freight and light rail run would together at grade per the SDEIS. The SDEIS does not explain, nor did the Southwest Project Office explain when I requested information on June 12, 2015, why 55 of the 67 moderate impacts and six of the severe impacts north of 21st Street have been downgraded or eliminated in the SDEIS. The discrepancy between the DEIS and the SDEIS, when both looked at co-location at grade between the Kenilworth Channel and the Penn Avenue station, remains a mystery.



A quiet snowy day on the Kenilworth Trail

3) SDEIS overlooks public safety issues

The proposed SWLRT 21st Street Station is situated in very close proximity to the beautiful Cedar Beach East (Hidden Beach). While this beach is used by hundreds of law-abiding sunbathers and swimmers in the summer, it is also known by some as a place to use drugs and alcohol. This beach annually generates among the most citations of any park in the state, and most violators come from cities other than Minneapolis according to police reports. An SWLRT station at this location will have particular public safety issues and needs. The Met Council must be responsible for designing a station area that won't exacerbate problems that the neighborhood has fought for many years.

Further, the SDEIS does not consider the infrastructure or access needs of emergency responders should a fire, police, or medical emergency occur in or near the Kenilworth Trail area, at Cedar Beach East, Cedar Lake Park, or Upton Avenue South if LRT and freight rail occupy the corridor.



Firefighters unable to access a grass fire in Cedar Lake Park because of a passing freight train

4) Freight rail is a new, permanent project

When freight rail was reintroduced into the Kenilworth Corridor, it was done so on a temporary basis. Until 2013, all studies and plans for LRT in the Kenilworth Corridor assumed that freight would be moved to make way for LRT. The Met Council now proposes to upgrade and make permanent the freight infrastructure used by one private company, even claiming in the SDEIS that doing so is a Metropolitan-area need that the SWLRT project should meet.

The myriad environmental impacts of this new, permanent freight project – which will transport hazardous materials in a narrow urban corridor next to passenger trains and trails – must be completely and thoroughly studied. The current SDEIS does not do so, and in fact barely touches on the co-location element of the revised SWLRT plan.



From: [kristina.patterson](#)
To: [swlrt](#)
Subject: Brookside resident light rail concern
Date: Monday, July 20, 2015 6:45:26 PM

I support the comparatively less-expensive possibility of adding a light-rail bridge over the wye (which would allow the SWLRT project to proceed) or at the very least, to advocate that money for mitigation should be set aside to offset the livability issues.

Thank you

Kristina Patterson

From: [Arlene Fried](#)
To: [swlrt](#)
Subject: Danger of Co-location of Freight and Lightrail
Date: Monday, July 20, 2015 5:47:52 PM

Danger of Co-location of Freight and Light-rail

I am opposed to the SWLRT co-location of freight trains and light-rail.
I want to make the point that the freight cars carrying flammable liquids can leak or exude flammable fumes and should not be located adjacent to light-rail and light-rail's electrical wires because of the danger of an explosion. This is particularly dangerous in the Kenilworth residential area. Co-location should be banned.

Arlene Fried
1109 Xerxes Ave.
Minneapolis, Mn 55405
Co-founder of Park Watch
www.mplsarkwatch.org

From: [Doug Jones](#)
To: [swlrt](#)
Cc: [Sue Sanger](#)
Subject: Light-Rail Alternative and the Southern Arm
Date: Monday, July 20, 2015 3:07:34 PM

Dear Ms. Jacobson,

On behalf of myself and our 86 members I want to express our chagrin to learn that the Met council, with the current SDEIS, was going back on their original agreement to move the bike trail rather than reroute rail traffic thru SLP if the Kenilworth Tunnel fully engineered out becomes too expensive. Clearly the entire SWLRT project's cost are escalating at such a rate that the economic viability not to mention funding is suspect.

At the very least we need to begin taking steps that pass the test of common sense and make it clear that if the Kenilworth tunnel once fully engineered out is cost prohibitive then we will move the bike trail rather than reroute an entire freight line. In addition, we need to demonstrate stewardship to our citizens by planning the addition of a Light-Rail Bridge over the wye for the Southern Arm rather than embarking on the more expensive and intrusive alternative of building a new Freight Rail Bridge.

Sincerely,
Doug Jones
President
Pointe West Commons Homeowner Association
St. Louis Park, MN

From: [Paul Petzschke](#)
To: [swlr](#)
Subject: Response to SDEIS regarding construction of Shallow Tunnel
Date: Monday, July 20, 2015 11:25:21 PM
Attachments: [Response to SDEIS F.docx](#)

Met Council,

Here's my response to the SDEIS.

Paul Petzschke

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Paul Petzschke
paulptz@elitemail.org

Executive Summary:

Calhoun-Isles Condominiums are converted 90 year old grain silos located at the narrowest point, commonly called the “pinch-point”, along the proposed Southwest LRT route. To accommodate the passage of two LRT rails, the Kenilworth Bike Trail, and the single TC&W heavy railroad track through this narrow gap, a shallow or “cut-and-cover” tunnel is proposed to be constructed for the LRT tracks, with the TC&W line and bike path to be above the tunnel at grade. Construction of the proposed tunnel comes within two feet of the Calhoun-Isles footings.

In April 2015, a high frequency vibratory hammer driving technique was used to install sheet piling at a six-story apartment site located at 3118 West Lake Street. Heavy vibrations were felt and structural damage occurred at the adjacent site of Loop Calhoun Condominiums, 3104 W Lake St., and at Calhoun-Isles Condominiums, located 180 feet away at its closest point. These damages and vibrations resulted in the cessation of construction and the implementation of a different method for installing pilings, namely an “H” pile structural piling system.

Seismic readings recorded at Calhoun-Isles by engineering firms contracted by the construction companies’ engineers did not correlate to vibrations and damages incurred. Whether these inconsistencies were the result of the unique structure of Calhoun-Isles concrete silo construction or unknown environmental conditions is unknown.

Furthermore, it has been learned that a hydraulic “press-in” technique is typical to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs.

Therefore, we feel the Met Council’s two stated techniques for driving the needed sheet pilings for the construction of the shallow tunnel are not suited for the conditions found in the Kenilworth Corridor. The hydraulic, high-frequency vibratory hammer method presents a unique risk to residents and structure at Calhoun-Isles. The hydraulic “press-in” method is not feasible given the soil conditions that exist.

We urge the Met Council to suspend the SDEIS process, to develop a viable method for installing sheet piles or its facsimile, and to demonstrate the feasibility of this yet-to-be-developed method at the “pinch-point”. If this rigorous, but necessary process is not accomplished successfully, there is concern that the construction of the shallow tunnel will not be able to go forward, that private residences will need to be expropriated, and that the two LRT rails, the Kenilworth Bike Trail, and the railroad track will all wind up at grade at the south end of the Kenilworth Corridor.

Findings:

Trammell Crow acquired the 1.89-acre site at 3118 Lake Street to develop a six-story apartment building with 164 units. Trammell Crow hired Big D to construct the apartment complex. Big D hired AET (American Engineering Testing) to do monitoring and engineering work and Trammell Crow hired Braun Intertec to do replicate monitoring and engineering work.

The construction phase of the project began in early 2nd quarter 2015. Two types of piling were installed at 3118 Lake Street, driven “H” piles and Sheet Piles. The driven “H” piling that was installed in mid-April caused initial neighborhood concerns and damage to both Loop Calhoun and Calhoun Isles Condominium Associations. Only a limited number of driven “H” piles were installed, and this phase of the project is complete. In late April and early May, Dig D conducted various trials using vibratory hammers to install sheet piles.

On April 30th, the Calhoun Isles Condominium Association Team met with Big D, American Engineering Testing, and Braun Intertec personnel on the 10th floor of the Calhoun Isles High Rise to discuss the status of the construction project and to help gain further insights on its impact on the High Rise. During the meeting, we learned that no pre-existing condition surveys were recommended for our Association because it is ~180 feet away from the nearest point of the construction site. It was thought that our Association buildings were too far away from the construction site to be damaged.

This situation was quickly addressed by installing monitoring devices in the High Rise to obtain vibration measurements. The results of these measurements are pending. The preliminary indications from the monitors supported the initial assumption. The readings were at the low end of scale; in fact, the monitors had to be adjusted, in order to obtain any readings at all. It was also agreed that American Engineering Testing would conduct pre-existing condition surveys at Calhoun Isles.

This meeting was held while trials using vibratory hammers to install sheet piles were occurring. The High Rise is ~180 feet from the construction site. The vibrations that were felt in the 10th floor conference surprised Big D, American Engineering Testing, and Braun Intertec.

Despite the low readings on the monitors, seven High Rise and three Lateral units have since reported damage as a result of the construction activities. A number of home owners reported feeling high levels of noise and vibration during the April/early May construction activities. Vibrations were felt in the elevators.

Given the fact that the shallow tunnel construction is to occur within 2 to 3 feet (not 180 feet) of the High Rise, our Calhoun Isles Condominium Association Team had a number of follow-up discussions about the impact that the SWLRT would have on our Association Buildings. The vibratory sheet piling installation is one of the options that the Met Council is considering for the construction of the shallow tunnel.

The speed of sound through concrete is as much as 3600 m/s; it is a very effective vibration transmitter. The High Rise was constructed from a series of grain silos. The concrete footings that support the silos go well below ground level. It is a unique building not only when compared to other local structures, many of which are wood construction atop concrete foundations (wood will not transfer vibration energy nearly as well as concrete will). It is also unique compared to other tall concrete structures in the area as its walls are ultra-thick. The entire structure is great at transmitting sound and vibration.

The High Rise has a number of features, which are susceptible to vibration. The underground garage was built when the silos were converted to residences. Three elevators were installed in the High Rise. The silos have an exterior stucco coating; it is a high-maintenance exterior. Balconies have been installed on nearly all High Rise units.

Based on discussions with a number of civil engineers and physicists, the impact on the High Rise from vibratory hammers to install sheet piles at a distance of 2 to 3 feet could be catastrophic. The possible consequences include:

1. Damage to nearly all the resident units in the 3151 Building (the structure closest to the proposed SWLRT line).
2. The elevator service in the High Rise would probably need to be shut down because of safety concerns.
3. The stucco could fall down in sheets due to resonance effects. This situation could result in injury or worse to residents.

4. The integrity of balconies could be compromised. This situation could result in injury or worse to residents.
5. The integrity of the garage could be compromised. This situation could result in injury or worse to residents.

On May 18th, Big D announced that the vibratory sheet piling installation was halted, that any installed sheet piling will be removed, and that an alternate foundation system will be developed. We since learned that the damage that the vibratory sheet piling installation caused to Loop Calhoun (primarily) and Calhoun Isles (secondarily) during the trial period was instrumental in the abandonment of this approach at the 3118 Lake Street Site. All the sheeting piling that had been installed has since been removed.

On July 6th, Trammell Crow/Big D announced the revised foundation plan that will be installed. This system will be an “H” pile structural piling system. It will involve these operations: 1) a hole, approximately 24” in diameter is drilled with an auger and filled with structural concrete as the drill bit is removed; 2) the “H” pile will then be pressed into the structural concrete hydraulically and allowed to cure. This process repeats approximately every 8’ on center; 3) once structural “H” piles are complete, an additional drilling process will occur between all “H” piles to install a 24” concrete slurry piling as the structural piles to serve as the structural site retention component.

Big D will conduct trials to install this “H” pile structural piling system starting the week of July 20th. The drilling will not be vibratory or driven in methods and while not particularly quiet, the level of noise and movement of equipment will be heard and occasionally felt but remain significantly below industry standards and city ordinances.

Discussion:

The Met Council provides limited reference to the construction methods that they propose employing in the SDEIS. These construction methods are referenced in their attachment, “Kenilworth Shallow LRT Tunnel Basis of Design Technical Report (Council, 2014d)”. This document describes two methods for installing the required sheet piling for the shallow tunnel: “Sheet pile installation is anticipated to be performed by a method that avoids hydraulic drop hammers. Methods such as a high frequency vibratory hammer or a hydraulic “press-in” device would minimize vibration and noise created by the sheet pile installation. Actual construction means and methods will be determined prior to construction in coordination between the contractor and the SPO (page 4)”.

The vibratory driving technique for installing sheet piling has caused too much damage to the neighborhood based on the experiences at 3118 Lake Street and has been eliminated as a means for installing sheet piling by the contractor in the CIDNA neighborhood.

The hydraulic “press-in” methodology was discussed at some length with Big D, American Engineering Testing, and Braun Intertec to determine its feasibility. Based on their feedback, it was learned that a “press” technique is “typical” to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs. It should also be noted that the current proposal for installing sheet piling (drilled “H” piling) at this site will be substantially more expensive to install than employing a hydraulic pressing technique.

Met Council personnel were questioned about these two proposed methods for installing sheet piling for the shallow tunnel. In one response, a Met Council spokesperson informed the public that the vibratory hammers

that Dig D employed to install the sheet piling at the 3118 Lake Street site were of inferior quality and this factor resulted in the damage to the two neighborhood associations. It was further reported that the Met Council would be using higher quality vibratory hammers and no problems would occur.

This matter was brought to Big D's attention; they reported it is unreasonable to label the equipment that they used as "inferior", but would be more appropriately labeled as "typical" in the industry.

In another instance, a Met Council Engineer was questioned about the proposed hydraulic "press-in" methodology. He insisted that this approach was valid and that it was the preferred route, despite the feedback that has been received from Big D, American Engineering Testing, and Braun Intertec.

An attempt was made to discuss these sheet piling methods directly with American Engineering Testing (AET) to gain additional information and insights. AET personnel informed me that they were under contract to the SWLRT and could not talk to me because of a conflict of interest. They told me to contact Met Council personnel directly.

Given this feedback from Big D, American Engineering Testing, and Braun Intertec, there is sufficient documented information available that demonstrates that the Met Council will not be able to use either a vibratory hammer or a hydraulic press to install the sheet piling for the shallow tunnel. These constraints will force the Met Council to employ alternate methods for installing sheet piling for the shallow tunnel.

The only other known method known for installing sheet piling is to employ the drilled H-pile Lagged System that will be attempted at the 3118 Lake Street site. The engineering company (AET) that is working on this site developed this recommendation. This very same engineering company is now under contract to the Met Council. One would logically conclude that they will make the same recommendation to the Met Council.

This installation method will be complicated by several factors:

1. This drilled H-pile Lagged System approach will be substantially more expensive than what is advertised in the SDEIS.
2. The concrete to stabilize the drilled H piles will need to be installed below the water table. This factor will complicate the installation. In addition, it may compromise integrity of the installation.
3. The drilling operation will occur within one to two feet of the Calhoun Isles Condominium Association and within close proximity of the Cedar Lake Shores Condominium Association and to many private residences along the Kenilworth Corridor. This drilling operation is anticipated to be noisy. The Met Council may need to find temporary housing for residents who live in proximity to the shallow tunnel construction site.
4. The size of the holes to install the drilled "H" piling raises additional concerns. As noted, holes approximately 24" in diameter will be drilled with an auger at the 3118 Lake Street site. This system will support a piling system that is 25 feet below grade. The shallow tunnel will require a piling system that will be 50 feet below grade. The holes for the drilled "H" piles may need to be larger for the shallow tunnel. There is limited space at the pinch point, i.e. the short distance between Calhoun Isles and Cedar Lake Shores Condominium Associations. It may not be possible to install this drilled "H" structural piling system without infringing upon and/or taking private property (including homes) at this point.

Conclusion and Recommendations:

The experiences at the 3118 Lake Street site raise a number of serious questions about the proposed methods that the Met Council intends to employ when constructing the shallow tunnel. The proposed methods include using a high frequency vibratory hammer or a hydraulic “press-in” device to accomplish the sheet pile installation.

The high frequency vibratory hammer driving technique for installing sheet piling caused too much damage to the CIDNA neighborhood based on the experiences at 3118 Lake Street and has been eliminated as a means for installing sheet piling by the contractor. It has also been learned that the hydraulic “press-in” is typical to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs.

The information about sheet piling installations that has been gathered during the past 12 weeks is based actual field experience and expert opinion from quality engineering companies. It has also been learned that American Engineering Testing, a company that acted as a primary consultant in developing an alternate sheet piling system for the 3118 Lake Street project, is under contract to the Met Council.

It is imperative that the SDEIS process be suspended until a viable construction method for installing a sheet piling like system for the shallow tunnel is properly developed with input from a quality engineering company such as American Engineering Testing. Once this alternate (and most likely more expensive) system is developed, its feasibility must be successfully demonstrated.

If this rigorous, but necessary process is not accomplished successfully, there is concern that the construction of the shallow tunnel will not be able to go forward, that private residences will need to be expropriated, and that the two LRT rails, the Kenilworth Bike Trail, and the railroad track will all wind up at grade at the south end of the Kenilworth Corridor.

I wish to thank Trammell Crow, Big D, American Engineering Testing, and Braun Intertec for the rigorous process that they employed at the 3118 West Lake Street construction site. While the noise and vibration from the initial sheet piling installation methods were below industry standards and city ordinances, they realized the problems that were being caused to the neighborhood in short order. They had the integrity to go back to the drawing board and to develop a system that would conform to the neighborhood requirements, despite the added cost. They should be commended for their willingness to share their findings and their process with the public.

Submitted By: Paul M Petzschke, 3116 Dean Court, Mpls, Mn

July 20, 2015

From: [Doug S](#)
To: [swlrt](#)
Subject: Southerly connection and removal of skunk hollo wye in St Louis Park
Date: Monday, July 20, 2015 10:05:06 PM

Hello Ms Jacobsen

It was recently brought to my attention that there is a proposal in the latest SDEIS for the southwest light rail transit to add a southerly connection for the freight rail connection onto the Dan Patch rail corridor, effectively making it easier to route additional rail traffic through the residential neighborhood of Brookside and neighborhoods to the south.

In the proposal I did not see any justification for this change or any estimation of the increase in volume of traffic that would come with it. The rerouting of this interchange is not something that I had heard of, prior to this week, being included in the swlrt plans or having any additional study attached to it to justify the additional cost other than making an improvement for the railroads at someone else's expense.

Needless to say I would be opposed to any change that would stage up putting more freight rail traffic twenty feet from neighborhood parks and through people's backyards. I don't believe this is something that should magically appear in an addendum given the potential impact and risk to a part of St Louis Park that is finally starting to see real revitalization and investment by its residents.

Doug Seitz
612.207.6533

From: [Shawn Smith](#)
To: [swlrt](#)
Cc: [Jeanette Colby](#); [Shawn Smith](#)
Subject: Southwest Light Rail SDEIS Response - Kenwood Isles Area Association (KIAA)
Date: Monday, July 20, 2015 5:41:29 PM
Attachments: [KIAA SDEIS Response July 2015.docx](#)

Attn: Met Council Commissioners and Planning Office

Whereas public comment has been asked for by the Met Council and SW Project Office regarding the SDEIS for Southwest Light Rail Transit,

Whereas the Kenwood Isles Area Association (KIAA) is the elected board representing the Kenwood neighborhood,

Whereas on July 6th, KIAA voted unanimously to submit the attached SDEIS response to the Met Council on behalf of the Kenwood neighborhood,

Whereas KIAA and the Kenwood residents have substantive concerns and questions regarding the SDEIS and the Minneapolis Segment, Kenilworth Corridor, of the proposed Southwest Light Rail Line, we do submit this response on July 20th, 2015.

KIAA would appreciate an acknowledgement of receipt of this document and the opportunity to discuss the concerns within in further detail.

Should there be an issue opening the file, two identical hard copies will be delivered to the Project Office in the morning of July 21st.

Sincerely,
KIAA Board

Jeanette Colby (Chair)
Larry Moran (Vice Chair)
Ed Pluimer (Treasurer)
Shawn Smith (Secretary)
Michael Bono
Dr Angela Erdrich
James Gilroy
Jack Levi
Josine Peters
Matthew Spies

Kenwood Isles Area Association

Southwest Light Rail Supplemental DEIS response

July 20th, 2015

Introduction to SDEIS Comments by the Kenwood Isles Area Association

The Kenwood Isles Area Association (KIAA) represents the neighborhood that extends, on its west side, from the proposed SWLRT Penn Avenue station to the Kenilworth Lagoon.

KIAA has participated in the SWLRT planning process in the spirit of cooperation and compromise for approximately nine years. For most of this time, we were assured verbally and in planning documents that freight rail in the Kenilworth Corridor was a temporary condition and would be moved to make way for LRT. The 2012 Draft Environmental Impact Statement clearly recommended that the best course of action was to relocate freight out of the Kenilworth Corridor.

This position was reversed in 2013, and the Metropolitan Council's policy is now to "co-locate" freight and light rail in the Kenilworth Corridor. We consider this a significant breach of public trust and the low point of a deeply flawed planning process.

The current Supplementary Draft Environmental Impact Statement is partly intended to assess the impact of co-location in the Kenilworth Corridor. It fails to do so on many levels, summarized in the two following points:

First, it considers the *temporary* freight rail part of the existing condition. Freight rail service that runs through the corridor will be both upgraded and made permanent; this is a *new* project that needs a full analysis. Because new *permanent* freight infrastructure is being added to the corridor, all visual, noise, vibration, safety and other environmental impacts should be measured from a basis of no freight and no light rail.

Second, this SDEIS is silent on the safety implications of locating freight trains carrying hazardous materials through an urban environment within feet of homes, parks, trails, passenger trains, and live overhead electrical wires. The new and serious impacts created by this situation will continue to grow as transport of oil, ethanol and other volatile materials expands and freight trains grow longer.

When Hennepin County and the Met Council chose the present route for SWLRT between the Chain of Lakes through the Kenilworth Corridor – and included "co-location" making the temporary freight rail permanent – they accepted the responsibility to respect the natural and built environments that it travels through as well as the people who bicycle, walk, recreate, and live there. KIAA does not see evidence that this responsibility has been taken as seriously as necessary and the following pages, which respond to specific elements of the SDEIS, articulate some of the reasons why.

3.4.1.2 Acquisitions and Displacements

B. Potential Acquisitions and Displacements Impacts

Comment: In Short-Term Acquisition and Displacement Impacts, the Council states “[s]hort-term occupancies of parcels for construction would...change existing land uses” including “potential increases in noise levels, dust traffic congestion, visual changes, and increased difficulty accessing residential, commercial and other uses.” The Council should say what the plans are to mitigate these effects for residents and businesses. Most important, how will prompt emergency fire, medical and police access be maintained?

In Short-Term Acquisition and Displacement Impacts, the Council discusses plans for remnant parcels without acknowledging its commitment with the City of Minneapolis in the Memorandum of Understanding. The MOU documents the Council’s agreement to convey property they own or acquire from BNSF or HCRRA in the Kenilworth Corridor that is not needed for the Project or freight rail to the Minneapolis Park and Recreation Board for use as parkland. Please see:

<http://metro council.org/METC/files/f7/f7d41cfb-a062-46c7-942d-0785989da8a0.pdf>

In the case that the MPRB decides against owning these properties, KIAA expects that the spirit of the agreement be upheld, i.e., that any remnant parcels remain publicly held.

3.4.1.3 Cultural Resources

B. Potential Cultural Resources Impacts

Comment: Minneapolis residents have continually expressed concern with the impact the project will have, both during construction and after operation of SWLRT, on cultural resources in the City.

As stated by the Minnesota State Historic Preservation Office, an adverse effect on one contributing feature is an adverse effect on an entire historic district. Therefore, the conclusion that the project will have an adverse effect on the Lagoon means that there will be an adverse effect on the Grand Rounds Historic District as a whole, as indicated in the SDEIS.

Section 3.1.2.3 of the SDEIS lists possible mitigation measures that may be included in the Section 106 agreement:

- Consultation with MNSHPO and other consulting parties during the development of project design and engineering activities for locations within and/or near historic properties
- Integration of information about historic properties into station area planning efforts
- Recovering data from eligible archaeological properties before construction
- Consultation with MNSHPO and other consulting parties during construction to minimize impacts on historic properties
- Preparation of NRHP nominations to facilitate preservation of historic properties
- Public education about historic properties in the project area

These items will not avoid, minimize or mitigate the long term adverse effects of the project on the Grand Rounds Historic District in a meaningful way. The noise impacts, including bells and horns, will be audible from distances within and beyond the Area of Potential Effect, and include not only the Lagoon area but also Lake of the Isles and Cedar Lake as well as the other parts of the Grand Rounds Historic District. Noise and vibration impact studies should be done from a baseline assuming no freight, as HCRRA had committed to do and as was contemplated in the DEIS. Despite the requirement that such impacts be minimized, co-locating both freight and light rail in the Kenilworth Corridor results in the opposite outcome.

The bridges over the Lagoon will have an adverse impact because of their the size and scale, inconsistency with the historic cultural landscape of the channel, the noise and vibrations caused by the light rail vehicles traveling the bridge and the fact that it may not be possible to mitigate the impacts of the new bridges, as stated by the MPRB earlier in the 106 process. The appearance of the new bridge structures and the sounds associated with modern rail infrastructure will alter the characteristics of “community planning and development,” “entertainment and recreation,” and “landscape architecture” that make the Lagoon eligible for NRHP designation, and will adversely affect the character and feeling of the Lagoon and how people use the historic resource, including the experience of using the waterway under the new structures. Given that the Council is proceeding with this project in spite of this adverse effect, we hope that designers will continue to be vigilant about minimizing the impact on the setting and feeling of the historic channel, including audible and visual intrusions that will alter the park-like setting of the Lagoon, a vital element of its historic character. These concerns extend to Cedar Lake and the beaches on it nearest to SWLRT, as well as the visual impact on Park Board Bridge #4, Lake of the Isles, Lake of the Isles Parkway and Lake of the Isles Historic District.

Table 3.4-5 lists cultural resources that have been preliminarily considered to have no adverse effect from the Project, because of continued consultation and avoidance/minimization/mitigation measures to be identified. The possible mitigation measures listed above would also not significantly address impacts on the cultural resources listed in this table. The Council must be responsible for ensuring that “continued consultation” is meaningful by conducting assessments and proposing specific

mitigation solutions before the 106 agreement is written and finalized, as it is impossible to avoid adverse effects after SWLRT construction and operations commence.

Cultural resources covered in table 3.4-5 include Lake of the Isles Residential Historic District, Kenwood Parkway Residential Historic District, Lake Calhoun, Cedar Lake Parkway, Cedar Lake, Park Bridge #4, Lake of the Isles Parkway, Lake of the Isles, Kenwood Parkway, Kenwood Park, Kenwood Water Tower and four NRHP listed or eligible homes in the Area of Potential Effect. Station activity will change traffic and parking patterns in the neighborhood and introduce long-term visual and audible intrusions that adversely impact these historic resources. Concerns about the long term Project impact on some or all of these cultural resources include the following:

- Long-term visual and audible intrusion from changes in traffic patterns related to station access: We are concerned that auditory impacts and changes in traffic and parking patterns will adversely affect the integrity of setting and feeling that make Kenwood Park, Kenwood Parkway, Lake of the Isles Parkway, Cedar Lake Parkway and the related residential historic districts, and the four individual homes listed on or eligible for the NRHP. A traffic analysis must be conducted and a plan to mitigate adverse impacts proposed and discussed before the 106 agreement is drafted.
- Noise effects from LRT operations: Audible intrusion from train operations, including bells and horns and the impact of trains going in and out of the tunnel, will alter the environment of the historic resources and the characteristics that make certain of these resources eligible for the NRHP. It seems unlikely that a few homes in the Kenwood Parkway Residential Historic District are the only cultural resources that will be adversely affected by noise from train operations.
- Infrastructure surrounding the tunnel and the massive tunnel portals could adversely affect the historic integrity of the resources. Signage along the historic parkways could also have an adverse effect. Specific design elements should be proposed to minimize these impacts and should be reviewed as part of the 106 process.

The degree of concern regarding the short term impact of SWLRT construction on all of these cultural resources cannot be overstated. Noise and vibration sensitive resources need to be identified. The public needs to see a comprehensive noise and vibration study and analysis for the Project during construction including the impact of increased truck and construction equipment traffic. We would like details on what will be included in the “project wide construction plan.” It should identify measures to be taken during construction to protect all historic properties from project-related activity including construction related traffic. We need to ensure that plans are in place to prevent or repair damage resulting project activities, incorporating guidance offered by the National Park Service in Preservation Tech Note #3: Protecting a Historic Structure during Adjacent Construction as well as an agreement that specifies how these potential impacts will be monitored. The Council previously communicated to a neighborhood group whose residents experienced damage from a Council project that “[c]ontinuing with future projects, our goal is to ensure that claims are promptly and appropriately investigated to determine whether or not they may be related to the project. Depending on the facts of the claim, this may involve independent experts.” We request that the Council communicate with owners of historic homes in the APE prior to construction.

The SDEIS also lists “station area development” as an item to be addressed through continued consultation. Numerous statements have been made that development is not anticipated at the 21st Street Station. For example, the Southwest Community Works website and documents state: “Future development is not envisioned around this station....”

<http://www.swlrtcommunityworks.org/explore-corridor/stations/21st-street-station>

The discussion of development potential at the Penn Station does not relate to the Kenwood Parkway side:

<http://www.swlrtcommunityworks.org/~media/SW%20Corridor/Document%20Archive/investment-framework/ch-4-penn.pdf>

The Council must explain what development is being referred to in Table 3.4-5.

3.4.1.4 Source: MnDOT CRU, 2014.Parklands, Recreation Areas, and Open Spaces

Long-Term Direct and Indirect Parklands, Recreation Areas, and Open Spaces Impacts

Comment: The SDEIS states: “None of the indirect impacts on parklands, recreation areas, and open spaces from the LPA in the St. Louis Park/Minneapolis Segment would substantially impair the recreational activities, features, or attributes of those parklands, recreation areas, and open spaces.” We dispute this conclusion. The permanent installation of freight rail and light rail in the Kenilworth Corridor that is too narrow to permit separation in accordance with AREMA and FTA guidelines creates a safety risk that would directly impair park activities in the event of a derailment and/or explosion of flammable materials.

For comment on the indirect impacts of the LPA in the form of visual, noise, and/or access impacts, please see comments to sections 3.4.1.5, 3.4.2.3, and 3.4.4.4 of this Supplemental Draft EIS response.

Short-Term Parklands, Recreation Areas, and Open Spaces Impacts

Comment: Please specify the extent to which the stated “standard” measures would be sufficient to protect the environmentally sensitive parkland, recreation areas, and open spaces along the Kenilworth Trail and adjacent parks. During construction, how can the safety of park and trail users (East Cedar Lake Beach, Cedar Lake Park, Lake of the Isles Park, and nearby trails and lakes) be assured, given that unit freight trains of 100 or more cars containing Class III flammable liquids, especially ethanol, travel through this narrow corridor in close proximity to a construction pit and materials, without whatever protective walls will later be installed? Please also explain how emergency vehicles will maintain access to East Cedar Lake Beach and Cedar Lake Park.

Section 3.4.1.5 Visual Quality and Aesthetics

Excerpt from City of Minneapolis RESOLUTION 2010R-008 by Colvin Roy:

Be It Further Resolved that the current environmental quality, natural conditions, wildlife, urban forest, and the walking and biking paths be preserved and protected during construction and operation of the proposed Southwest LRT line.

Be It Further Resolved that any negative impacts to the parks and park-like surrounding areas resulting from the Southwest LRT line are minimized and that access to Cedar Lake Park, Cedar Lake Regional Trail, Kenilworth Trail and the Midtown Greenway is retained.

Comment: While we appreciate and agree that the visual impact from Viewpoints 2, 3, and 4 are recognized as being substantial, we strongly disagree and contest the idea that the level of visual impact north of the Kenilworth Channel crossing (including Viewpoints 5 and 6) will be “not substantial.” (pages 3-167, 168). The negative visual impact of SWLRT in the Kenilworth Corridor, especially with freight rail remaining (contrary to all previous planning), will be substantial throughout the corridor.

Throughout this area, the SWLRT project will remove a large amount of green space and trees, and replace them with an overhead catenary system, tracks and ballast. The park-like environment will be permanently degraded by this infrastructure, as well as by the approximately 220 daily trains traveling over the historic Kenilworth Lagoon and through the corridor.

Clearly, the degree of change in the visual resource will be great, and, with well over 600,000 annual visitors to the Kenilworth Trail, the exposure to viewers will be high. Over the past 7 to 10 years, neighbors and trail users have clearly expressed to Hennepin County and the Met Council the very high value they place on the green space, wildlife and bird habitat, trees and other vegetation in the Kenilworth Corridor.

The visual impact to the park-like environment is exacerbated by the continuing presence of freight rail, which was expected to be removed from the Kenilworth corridor at the time of the Alternatives Analysis, the Locally Preferred Alternative decision, and the 2012 DEIS.

It appears that the consultant determining the visual qualities of the corridor relied entirely on Google Earth, files of the revised project layout, and selected “photographically documented” views (Appendix J, section 2B). If this is true, it is very discouraging that the area was not visited in person by the evaluator, nor were any stakeholders consulted.

At **Viewpoint 5**, we support all efforts to create an “attractive design” for the bridges crossing the Kenilworth Channel. The three new bridges will certainly become a “focal point,” adding large cement structures and heavily impacting the setting and feeling of this element of the Historic Chain of Lakes and the Kenilworth Trail. An attractive design for these bridges does not compensate for the vegetative clearing. The character of the City of Lakes’ signature canoe, kayak and skiing route from Lake of the Isles through the Kenilworth Channel to Cedar Lake will be fundamentally and permanently degraded. There will be a substantial negative visual impact from the level of the water as well as the level of the trail.

At **Viewpoint 6**, the SWLRT project plans to remove a significant amount of vegetation along the edge of Cedar Lake Park, as well as trees, plants, and restored prairie currently along the bicycle and pedestrian trails. The claim that removing trees and replacing them with overhead power lines would create a positive visual experience for trail users (“open up the view, making it more expansive”) is absurd on its face and contradicts the clearly expressed will of the Minneapolis City Council and the adjacent

neighborhood. The 21st Street Station – a slab of concrete and metal with fencing and catenaries – will certainly “create a focal point,” but it is not credible to assert that this will positively impact the visual qualities of a place that is now adjacent to an urban forest and is itself in a “park-like environment.”

The negative visual impact of SWLRT in the Kenilworth Corridor, especially with freight rail remaining (contrary to all previous planning), will be substantial throughout the corridor. **We assert that the Council must recognize this and identify robust and meaningful mitigation measures for incorporation into the project. In fact, many feel that the adjacent parkland and the park-like environment of the Kenilworth Trail will be forever disrupted, and this alignment was selected when other, better alignments exist.**

3.4.2.1, 3.4.2.2 Geology and Groundwater, Water Resources

Comment: Given its history as a marshy area that in many places was made solid by landfill, and its former use as an active freight corridor, KIAA is very concerned that so much remains unknown about the soil and groundwater conditions in the Kenilworth Corridor under which the SWRLT tunnel and other elements will be built.

On page 3-170, the SDEIS notes, “the amount of settlement below and in the vicinity of the tunnel would be negligible.” KIAA urges the Met Council to consult with the builders and managers of Calhoun Village about settling. Our understanding is that the buildings in Calhoun Village are built on pilings; the parking lot has settled and been raised, perhaps more than once, so the step from the walkway in front of the stores to the asphalt remains within reach. KIAA has no engineering data, but we have been told that an underground flow from Cedar Lake to Lake Calhoun is believed to be responsible for the parking lot sinking. With the longer, heavier freight trains that have begun to use the Kenilworth Corridor – which will likely increase with the upgraded rail facilities that the Met Council plans to build as part of the SWLRT project – and the frequent LRT trains, KIAA is not confident that “construction and operation of the light rail system would not affect the performance of the proposed tunnel or the other structures located in the vicinity of the tunnel, such as roadways, utilities, and nearby buildings.”

Regarding groundwater, the SDEIS further points out that “in areas with high groundwater elevations and granular soils, there is an increased potential for groundwater contamination as a result of previous hazardous and contaminated materials spills” (page 3-168). We appreciate the Council’s plan to create a system of filtration tanks and infiltration basins to accommodate a 100-year storm event during construction, but urge the Council to fully understand the nature of the contaminants in the soil before digging begins. The Council assumes that it will obtain permits from all local, state, and federal agencies for impacts to wetlands and other aquatic resources, but it would, of course, be irresponsible for these agencies to grant permits if unknown contaminants cannot be safely managed. We also urge the Council to understand the costs of dealing with this contamination before proceeding with construction, as we understand these cost are not currently known.

KIAA requests that there be a much more significant and transparent presentation regarding the compensatory mitigation for damage to wetlands and aquatic resources in the Minneapolis segment, especially potential for damage to the Kenilworth Channel and Cedar Lake.

While a permit application is required, the SDEIS identifies that there will be damage done to Minneapolis’ aquatic resources but does not specify the level of damage that may be done during construction and operation of the SWLRT. The further impairment of these resources is a violation of the EPA Clean Water Act. The Minneapolis Chain of Lakes is a vital recreational and natural resource; while we appreciate that the Council will apply for a Section 404 permit, to knowingly degrade the Chain of Lakes is unacceptable.

Further, KIAA is not convinced that sufficient analysis has been done on existing contamination in the Kenilworth Corridor. The Kenilworth Corridor north of 21st Street is a former rail yard that housed up to 58 rail lines during its peak and was in service for decades. The SDEIS specifies the numerous toxic contaminants in the area due to this former use. Much of the rest of the Kenilworth area was constructed through landfill when standards for waste disposal were not stringent. When disturbed, contaminants from freight operations and landfill could enter the nearby lakes and groundwater.

In a June, 2015, Community Advisory Committee meeting, Southwest Project Office staff told the committee that contamination beyond what was identified in the SDEIS is likely to be found. Advancing the project without thorough knowledge of the type and degree of contamination elevates the risk to our water resources. The SPO staff further stated that measures to address the additional contamination are to be covered by contingency monies from the overall project budget. The SPO admits it does not fully understand the scope of the contamination nor does it know whether there will be adequate funds to address the potential

contamination of soil and water resources due to the construction and operations of the SWLRT. KIAA finds this approach to be irresponsible both financially and environmentally.

Noise 3.4.2.3

The SDEIS simply states that the noise issues described below will be addressed in the Final EIS and that they will be mitigated. We take the strong view that now is the critical and only time to prove that mitigating the noise issues we have described is possible and that the cost of such mitigation is in the budget.

Comment: We believe that the SDEIS substantially minimizes the noise impacts associated with the proposed SWLRT. The noise impact of SWLRT through Kenilwood and CIDNA will be highly significant for a number of reasons, but most notably because of the tranquility, recreational, park, and residential use currently existing in and bordering the Kenilworth Corridor. This proposed SWLRT route is not comparable to the Blue Line (Hiawatha) and the Green Line (Central Corridor down University Avenue), which are immediately adjacent to commercial thoroughfares or four-lane roads that carry cars and heavy trucks around the clock. By contrast, the Kenilworth area is a quiet environment, and is part of the **Grand Rounds National Scenic Byway**.

A **National Scenic Byway** is a road recognized by the [United States Department of Transportation](#) for one or more of six "intrinsic qualities": archeological, cultural, historic, natural, recreational, and scenic. The program was established by Congress in 1991 to preserve and protect the nation's scenic but often less-traveled roads and promote [tourism](#) and economic development. The National Scenic Byways Program (NSBP) is administered by the [Federal Highway Administration](#) (FHWA). The Kenilworth Corridor accommodates pedestrian and bike traffic, along with a slow moving freight train – two to five times per 24 hour period – which was intended to occupy the corridor only on a temporary basis.

The noise of 220 light-rail trains running daily from 4 a.m. to 2 a.m. would fundamentally transform the Kenilworth Corridor and the adjacent neighborhood with near-constant noise and vibration.

The noise levels given in Noise Fact Sheet (Appendix H p. 19) state the following: LRT trains traveling at 45 mph generate maximum typical noise levels of 76 dBA at 50 feet, 71 dBA at 100 feet, and 66 dBA at 200 feet. Adding 211-220 LRT 3 - car trains to the Kenilworth Corridor day and night, each producing such elevated noise levels, would be a severe and overwhelming intrusion, critically increasing the noise generated. This holds true even if the only noise increase resulted from the LRT trains traveling at their stated speed, per the SDEIS, of 45 mph.

The result of LRT noise is the corridor will be permanently changed from a quiet, tranquil area sought by pedestrians, cyclists, and outdoor enthusiasts, to a severely noise disrupted, highly mechanized transit route.

Beyond permanently degrading the area, there will be multiple public health consequences of SWLRT noise in the corridor. The impact of repetitive noise intrusion on neighborhood public health will be significant. For example, regarding the obvious potential for sleep interruption caused by SWLRT noise, a research review published in the December 2014 edition of *Sleep Science*, summarizes:

emerging evidence that these short-term effects of environmental noise, particularly when the exposure is nocturnal, may be followed by long-term adverse cardio metabolic outcomes. Nocturnal environmental noise may be the most worrying form of noise pollution in terms of its health consequences because of its synergistic direct and indirect (through sleep disturbances acting as a mediator) influence on biological systems. Duration and quality of sleep should thus be regarded as risk factors or markers significantly influenced by the environment. One of the means that should be proposed is avoidance at all costs of sleep disruptions caused by environmental noise."

The article goes on to review that:

The World Health Organization (WHO) has documented seven categories of adverse health and social effects of noise pollution, whether occupational, social or environmental. The latter [sleep disturbance] is considered the most deleterious non-auditory effect because of its impact on quality of life and daytime performance. Environmental noise, especially that caused by transportation means, is a growing problem in our modern cities. A number of cardiovascular risk factors and cardiovascular outcomes have been associated with disturbed sleep: coronary artery calcifications, atherogenic lipid profiles, atherosclerosis, obesity, type 2 diabetes, hypertension, cardiovascular events and increased

mortality....during the past year, the relationship between insomnia and psychiatric disorders has come to be considered synergistic, including bi-directional causation.”¹

Further, there is growing evidence that the opportunity for experiences in greenspace and nature supports social and psychological resources and recovery from stress.² The perpetual and repetitive noise from SWLRT would interrupt the current experience of the Kenilworth Corridor, nearby beaches, parks, the Kenilworth Channel and general environs of Lake of the Isles and Cedar Lake. Opportunities for experiences in natural environments, though often taken for granted by suburban dwellers, are extremely limited in urban areas, yet equally if not more critical for the mental health of urban residents. With healthcare costs and disease prevention being prominent national and local priorities, the economic value of the public health benefit of the Chain of Lakes and Kenilworth Corridor cannot be simply ignored.

A. Existing Conditions (p. 3-180)

Fundamental defect with baseline noise measurements

Comment: The SDEIS uses wrong data as the fundamental framework for noise and vibration analyses. The sole purpose of this SDEIS is to assess the impact of changes made in the SWLRT plan since the 2012 DEIS; the baseline data used in this study should therefore have reflected that 2012 plan — which *did not include a freight train*. However, the SDEIS bases its noise and vibration data on a scenario that *does* include a freight train, thereby misleadingly minimizing the degree to which noise and vibration would be increased above what was indicated in the 2012 DEIS. Use of the wrong baseline data means that in this section the document fails to meet its goal of evaluating “the result of adjustments to the design of the Southwest LRT Project since the publication of the Draft EIS in 2012.”³ ***This defect renders the noise and vibration sections of the SDEIS fundamentally flawed and misleading. They need to be reworked with appropriate and correct data.***

The SDEIS estimates noise and vibration impacts from points that would not be the most severely impacted. The SDEIS does not measure impacts on residences closer than 45 feet from the SWLRT tracks, whereas the closest homes to the LRT tracks are only 31 feet away. The CIDNA-sponsored study by ESI Engineering raised this problem with respect to the 2012 DEIS, but it has not been reflected and incorporated into the SDEIS. KIAA requests that the SW Project Office contact CIDNA to obtain a copy of this report.

Additionally, there are significant seasonal and weather-related variations in noise levels, which cannot be captured when sound is measured during one 24-hour period in the summer.

Finally, in Appendix H, p.2, it is noted that “noise monitoring was performed at other locations not listed in the table. Those sites will either be addressed in the forthcoming Final EIS or no longer fall within the area where they would be potentially impacted by project noise due to design refinements during Project Development.” Since the purpose of the SDEIS is to inform the public and decision makers, and provide opportunity for comment on all areas of concern, in order to fulfill that NEPA mandate, all measurements that were made and publicly financed should be made public.

B. Potential Noise Impacts

Comment: Following FTA noise assessment guidelines, the 76 dBA LRT noise every 5 minutes is measured as having a lower impact than actual dBA of 76 because the LRT noise is not continuous. Thus, though this quiet urban area will be exposed to an actual repetitive noise of 76-80 dBA day and night, the rating of the impact is lower and measured as 51 – 64 dBA in Tables 3.4-11, 3.4-12. The significantly lower measurement lessens the determination of findings of impacts, and therefore, whether impacts are determined as non-existent, moderate or severe. This engineering methodology covers up the actual impact on people of loud repetitive noise in a peaceful setting.

Repetitive bell noise does not appear to be included in the SDEIS noise analysis in Tables 3.4-11, 3.4-12, which would clearly increase the severity of noise impact at all locations.

The SDEIS also neglects to report and measure the cumulative effect of LRT and freight train noise. This information would likely show that more than 24 residences would be affected; more of them would be impacted at the severe level, and a greater impact on the Kenilworth Channel and Kenilworth Lagoon Bank.

¹ Sleep Science, Volume 7, Issue 4, December 2014, Pages 209-212).

² British Journal of Sports Medicine 2012, “The Urban Brain: Analyzing Outdoor Physical Activity with Mobile EEG.”

³ <http://metro council.org/swlrt/sdeis>

Analysis of Table 3.4-12

Inaccurate land use designation for the Kenilworth Channel

KIAA strongly questions the land use designation of the Kenilworth Channel as Category 3. As defined in Appendix H, Category 3 is:

Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, and churches where it is important to avoid interference with such activities as speech and concentration on reading material..."

The SDEIS designates the banks of the Kenilworth Channel as falling within the most noise sensitive Category 1. However, as stated above, the Channel itself is not included in that most highly sensitive designation, but instead is classified as "institutional land use." Category 1 is defined in Appendix H as:

Tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use.

The SDEIS states the "grassy area on the banks of the Lagoon" falls within Category 1 due to the "passive and noise sensitive recreational activities that occur there (where quietude is an essential feature of the park)." The designation of Category 1 versus 3 for the Kenilworth Channel appears to hinge excessively on one word -- the term "passive" to describe the activities for which the Channel banks are used. However, quietude is equally and very clearly an essential feature of the Kenilworth Channel itself, whose peaceful though not "passive" activities include canoers and cross country skiers gliding serenely on the water or ice while those on the grassy banks look on. The quietude of the Kenilworth Channel is inseparable from the quietude of its grassy banks; therefore both should be Category 1.

Most significantly, that the consequence of placing the Kenilworth Channel in Category 3 is that both the obligation to mitigate impacts is lowered, and the threshold to establish severe impact is higher and harder to reach. Had the Kenilworth Channel been accurately designated a Category 1, then the Channel would have been only 1 dBA below "Severe impact."

Even with the lowering of the land use category of the Kenilworth Channel to a Category 3, the SDEIS finds a moderate impact of the addition of LRT noise. The footnote to SDEIS Table 3.4-12, states that the noise impact increases as one approaches the LRT line and becomes severe when the channel falls within the HCRRA right of way.

While the SDEIS states that the land use categories were made in consultation with the MPRB and MN SHPO, we strongly dispute their coherence and accuracy. If the intention of the SPO is to preserve the character and experience of the Channel, then it must designate it as a Category 1 and then make public the mitigation plans and costs well in advance of the final FEIS.

SWLRT Breaks the System of Minneapolis Parks.

Horace Cleveland's visionary masterplan, Suggestions for a System of Parks and Parkways for the City of Minneapolis, proposed a park system of connecting sites of beauty and natural interest throughout the city, rather than a series of detached open areas or public squares. The vision of a park "system" has guided the Park Board ever since and is one of the primary reasons for the success and national prestige of the Minneapolis Parks. The SDEIS procedure of singling out specific pieces of park for analysis such as Lilac Park, the Kenilworth Channel and its grassy banks runs fundamentally contrary to the underlying vision of a Minneapolis Park System.

The scenario of perpetual, repetitive LRT noise over the Kenilworth Lagoon and throughout the interconnecting parks and lakes woven throughout this area breaks the larger system of the Minneapolis Parks.

Site N 17 (p. 3-182)

21st Street Noise Impacts

We strongly disagree with the characterization of the noise impacts in the 21st Street station area as moderate and limited. "Sensitive receptors" in this area will be subject to train arrivals, departures, signal bells and perhaps horns, seriously eroding the quality of life in the neighborhood and reducing the enjoyment of the recreational trail and Cedar Lake Park for users of these regional amenities.

As we currently understand the SWLRT project, crossing and station bells will generate a noise level of 106 dBA and LRT bells generating 88 dBA for 22 hours; only between 2:00 a.m. and 4:00 a.m. will neighborhood residents be able to sleep uninterrupted.

Further, freight trains, which were supposed to have been relocated out of the Kenilworth Corridor to make way for LRT, may need to use bells and horns to safely cross 21st Street. This noise impact, which we regard as *new* since the status of the freight rail is going from temporary to permanent, does not seem to have been considered in the SDEIS.

We disagree with the assessment that the SWLRT project will create only 22 moderate noise impacts and one severe impact within the 21st Street station area. With appropriately robust measurement of the existing conditions (*without* freight), many of the residences with noise impacts deemed “moderate” would likely experience severe impacts. In addition to the residences identified in the SDEIS, residences along 21st Street, 22nd Street, and Sheridan Avenues will also experience at least moderate noise impacts. It’s clear that although measurements may not rise to the “moderate” or “severe” level as defined in engineering manuals, noise from the 21st Street station will degrade a large portion of the Kenwood neighborhood. We underscore the need for the highest level of noise management and mitigation.

NB: It appears that the SDEIS may misidentify some of the homes deemed to have a “moderate impact without mitigation” as being on Thomas Avenue South; some of the addresses may actually be on Sheridan Avenue South.

LRT Horns are Likely

According to the federal Train Horn Rule⁴, locomotive engineers must sound horns at a minimum of 96 decibels for at least 15 seconds at public highway rail grade crossings. Appendix H indicates that LRT Horns are 99 decibels and are sounded for 20 seconds. The SDEIS states that LRT horns would only be sounded at crossings where speeds exceed 45 mph. Since LRT and freight trains may not reach that speed in the Kenilworth Corridor, presumably no horns would be sounded when LRT vehicles cross 21st Street. Given the volume of pedestrian, bicycle, and car traffic at this crossing, it may not be safe to silence LRT horns at this crossing. That does not mean that KIAA welcomes the horns being sounded due to the pre-stated tranquility of the corridor and the severity of the noise impacts. If they were reinstated for safety reasons, the noise created by horns sounding for LRT trains at least 96 decibels for a minimum of 15 (or 99dBA for 20) seconds represents a “severe” noise impact and is therefore prohibitively detrimental to quality of life in a residential neighborhood. KIAA has no evidence that there is a viable solution to the conflicting imperatives of safety vs. quality of life.

Not addressed: Impacts near Portals

Two areas of potential noise impacts do not appear to be adequately addressed by the SDEIS.

First, table 3.4-11 does not appear to cover noise that will be experienced by the homes directly behind the SWLRT tracks after it emerges from the tunnel and crosses the Kenilworth Channel. Since LRT on ballast and tie track produces noise at 81 dBA, we believe that those residences will experience noise at the same level as homes on Burnham Road and Thomas Avenue South. Further, Appendix H notes that noise will increase by 1 dBA for homes within 100 feet of the tunnel entrance/exits. We strongly request that noise impacts be determined for those residences and that they be included in consideration for noise mitigation. We further request that the cost of that additional mitigation be identified and made public prior to the final DEIS.

Not addressed: Tunnel Ventilation System

Second, noise from the tunnel ventilation systems does not appear to have been considered. The SDEIS states that the tunnel section of the SWLRT is supposed to eliminate “almost all noise impacts within that segment of the corridor.” However, we understand that there will be ventilation fans connected to the tunnels as well as a ventilation “building” planned near Cedar Lake Parkway. The SDEIS neglects assessment of the noise impacts from such a ventilation system, and this information is critical to determining whether the proposed tunnel would have a positive or negative environmental impact.

Policy-makers and citizens need adequate information on the noise impacts of both the vents and the ventilation building, among other things, before proceeding with tunnel construction. Appendix H indicates that the fans will operate only on an emergency basis, but we do not see any mention of the ventilation building in the SDEIS. We request clarity on the amount of time each day that they will be operational and creating noise impacts, and the dBA of each.

Not addressed: Freight Operations

The existing freight operations, intended to be temporary, are being made permanent. The noise generated by these trains, which often have three or four engines, must be measured and considered in the overall assessment of noise impacts of the SWLRT project.

The SDEIS simply states that the noise issues described above will be addressed in the Final EIS and that they will be mitigated. We take the strong view that now is the critical and only time to prove that mitigating the noise issues we have described is possible and that the cost of such mitigation is in the budget.

3.4.2.4 Vibration

LONG-TERM DIRECT AND INDIRECT VIBRATION IMPACTS

Comment: The SDEIS states, “There are no vibration impacts in this segment [of the SWLRT route]” This claim is not credible in view of advice provided in *Transit Noise and Vibration Impact Assessment*, the FTA’s own guidance manual presenting procedures for predicting and assessing noise and vibration impacts of proposed mass transit projects:

Vibration from freight trains can be a consideration for FTA-assisted projects when a new transit line will share an existing freight train right-of-way. Relocating the freight tracks within the right-of-way to make room for the transit tracks must be considered a direct impact of the transit system which must be evaluated as part of the proposed project. However, vibration mitigation is very difficult to implement on tracks where trains with heavy axle loads will be operating.”⁵

The SDEIS says that 54 residences⁶ in the “St. Louis Park/Minneapolis” segment (note that all of them are within Minneapolis) will be impacted by the ground-borne noise. This is an unacceptable level of impact on those 54 families.

Regardless of whether the residences are impacted by vibration from the tunnels or from the noise which is flagged as a “Residential Annoyance” in the tables in Appendix H, the fact that these “annoyances” will occur incessantly — 220 times per day starting at 4 a.m. and continuing to 2 a.m. — means the impact on those residents will be significant and should be considered “severe”. The impact of vibration of the freight rail, which the SW LRT is making into a permanent condition, should be included in this analysis.

Regarding ground-borne vibration and noise, it should be noted that the impacts projected might underestimate real-world impacts, which could be more annoying than assumed in this SDEIS. The FDA manual states: ⁷

...the degree of [ground-borne vibration and noise] annoyance can not always be explained by the magnitude of the vibration alone. In some cases the complaints are associated with measured vibration that is lower than the perception threshold.

SHORT TERM VIBRATION IMPACTS

The SDEIS all but ignores construction-related ground-borne noise (vibration) — except for a single, dismissive comment: “Short-term vibration impacts are those that might occur during construction of the LPA while jackhammers, rock drills, and impact pile-drivers are being used.” Within a month of this writing, impact pile-driving on the former Tryg’s restaurant site in the West Lake Station area caused serious damage to the Loop Calhoun condominiums, as well as some level of damage to the Cedar-Isles Condominiums. The project had to be halted (the piles were extracted), since going forward was deemed to be catastrophic. The pile-driving entailed in building the SWLRT tunnel would take place much closer to these and other condominiums, duplexes and apartment houses. The Tryg’s site incident seems to strongly predict a risk of significant construction-related damage to the homes of hundreds of people who live along the corridor where impact pile-driving for SWLRT is planned.

Furthermore, the recent Met Council sewer project completed in this area caused damage to homes located beyond the “expected” range of distance from construction. Residents who attempted to get compensation for the damage were often told by the Met Council to take the matter up with their own insurance companies rather than through the contractors whose work caused the damage. A specific liability plan and budget should be included in the project cost estimates. There is a “contingency” line item in the budget, but it should be used for truly “unpredictable” costs that arise during the construction, and not for costs that could be, should be, and even are anticipated.

Construction-related vibration impacts could well extend beyond the construction period itself. Damage incurred during construction may not be initially apparent, and could show up months or even years later.

Note that KIAA submitted concerns about building conditions during the 2012 DEIS scoping period. During this period, Kenwood residents showed that new construction in the 2500 block of Upton Avenue South required extra deep footings due to the unstable nature of the soil. Architects’ drawings and technical information were submitted to Hennepin County.

KIAA requests that the nature of the building conditions be better understood before proceeding with the tunnel and bridge construction. Further study is needed of:

⁵ Chapter 7: Basic Ground-Borne Vibration Concepts, 7-9

⁶ All of them are Category 2 receivers: “residences and buildings where people normally sleep.”

⁷ Chapter 7: Basic Ground-Borne Vibration Concepts, 7-6

- 1) The effects of various pile-driving alternatives on the many at-risk structures
- 2) The costs involved with each of those alternatives;
- 3) The geology of the area, and its ability to support the construction process.

MITIGATION

The SDEIS promises mitigation of a number of vibration problems. However, the failure of Met Council mitigation measures taken to address LRT problems experienced by the University of Minnesota and Minnesota Public Radio cast abundant doubt on whether they will be effective here.

With respect to the vibration mitigation (to be further detailed in the Final DEIS), the measures suggested in Appendix H appear to be inapplicable to the many residences that would be affected. The SDEIS describes isolated tables and floating floors. It's hard to imagine a retrofit of the residences impacted by the vibration affects utilizing "floating floors." If this is the intent of the mitigation planned for the SWLRT, a cost estimate of the retrofit of all the residences should be included in the Final DEIS.

3.4.2.5 Hazardous and Contaminated Materials

KIAA understands that an online search of MPCA and MDA databases was conducted to identify documented hazardous and contaminated soils in the Kenilworth Corridor (page 3-189). While we appreciate that several sites were located with this method, people who have lived in Kenwood for many years have reported that undocumented disposal of hazardous waste formerly occurred in the Kenilworth Corridor area. KIAA has only anecdotal evidence, but we urge the Met Council to thoroughly investigate the possibility of undocumented contamination prior to commencing construction.

The SDEIS does not make clear whether the contamination risks throughout the corridor, including those areas of potential groundwater contamination or contamination that may infiltrate groundwater when disturbed, will be subject to Phase II evaluation prior to construction. Permanent pumping of an average of up to 520 gallons per day of water that has seeped into the tunnel would, if contaminated with the residue of freight operations or landfill, directly pollute the Chain of Lakes. We request that this risk and valid mitigation measures be identified before it is determined that a tunnel is environmentally safe and appropriate to build. The SDEIS states:

"Over the short term, four of the high-risk sites have the potential to directly affect LPA-related construction activities in the St. Louis Park/Minneapolis Segment (see Table 3.4-15). As previously noted, the high-risk sites would be investigated prior to construction using a Phase II ESA, which would include preliminary soil and groundwater investigations."

Long-term Direct and Indirect Hazardous and Contaminated Materials Impacts include:

- Permanent pumping of contaminated groundwater
- Impacts of disturbance of dangers in soils that may have long term health impacts on children and vulnerable adults
- Not covered in the SDEIS is the co-location of SWLRT in close proximity to hazardous and explosive materials being carried by the railroad. KIAA does not believe that the general public is even aware of the amount of wiring and electrical current and sparking in the LRT infrastructure, and we request that the Met Council make a public statement informing the general public of such. Below is a photo of a green line junction of a power tower that will be in very close proximity to the ethanol trains. KIAA strongly objects to this alignment and the risk to those families living in the "blast zone."



SHORT TERM

The DEIS called for Phase I ESA to be completed, and it was completed in August 2013. It was not made public by the Met Council until May 19, 2015, and indicates many potentially hazardous and contaminated sites along the alignment. It is reasonable to expect to encounter extensive contamination in the Kenilworth Corridor. In addition to being home to several railroad tracks, the Kenilworth Corridor was home to a maintenance yard, blacksmith and boiler shops, a diesel shop and a 90,000-gallon fuel storage facility. In addition, the land was used as a dump — a common practice of the time, and it is likely that arsenic will be among the dangers encountered, requiring special remediation.

The Phase II Environmental Site Assessment (ESA) is said to be near completion; the report must be made available for public review and comment as soon as it is available. The SDEIS says it is “reasonable to expect that previously undocumented soil or groundwater contamination may be encountered during construction.” It is unclear if any findings in the Phase II ESA have been incorporated into the SWLRT project budget.

The SDEIS comment, however, seems to say that the cost of such remediation is unknown and has not been included in the cost estimates. Several sections of the alignment have been designated part of the MPCA Brownfields Program. In the best-case scenario, they will not require much remediation; in the worst case, they could become a Superfund site, requiring significant and expensive remediation.

Several members of the public requested budget information that would indicate what amount of the May 2015 increase in the budget from \$1.65 billion to \$1.99 billion was earmarked for remediation in the Kenilworth Corridor. The SW Project Office provided only the highest level of information, and indicated that they do not track the line items for things like soil remediation on a segment-by-segment basis, but only in total for the project. KIAA is disappointed in this low level of transparency and is left to wonder if remediation will require a Construction Contingency Plan above and beyond the general Contingency budget line item. The cost of such a Contingency Plan for Remediation should be included in the project budget.

3.4.3 Economic Effects

Long-Term Direct and Indirect Economic Impacts

Comment: KIAA disputes the statement that SWLRT will positively impact property values, especially around the 21st St station and Kenilworth Channel. The current freight alignment in the Kenilworth Corridor, which was supposed to be temporary, is already a negative and permanent defect on property values, and this becomes magnified as a negative defect on properties along the line with co-location of SWLRT. The threat of a collision and derailment as such incidents gain increased attention in the news media will in all likelihood increase the scrutiny of buyers as they evaluate the Kenilworth area as an investment and home for their families. Much of Kenwood is within the half mile “blast zone.” Currently there is no viable plan to contain the effect of a derailment and crash in any urban area other than to let the blast “burn out” for the safety of the overwhelmed first responders. Further, the increased noise, vibration, and light without the previously promised removal of freight rail is an exponential increase in the disturbance in an area that is well known for its park-like feel and “up north” atmosphere. The increased adverse effects of co-location will be a permanent defect to homes within earshot and sight of the line; auditory adverse effects would reach as far as Lake of the Isles Parkway based on the audible sounds of the current freight line, but as a much more disruptive cacophony of LRT bells and horns versus the current infrequent “low rumble” of freight.

Further, while studies such as *rtd-fastracks.com* and others show that the access to light rail increase property values in high density, transient (apartment-filled), younger, urban neighborhoods, the area around the Kenilworth corridor is not representative of those attributes. The study mentioned, among others, shows that higher income and low-density neighborhoods do not see the positive impact on property values, as they do in lower to middle income neighborhoods that more regularly use public transit.

While the projected 1600 ride/daily boardings and alightings appear unrealistic, there will nonetheless be an adverse impact from those who do park in the neighborhood to access the station, resulting in residents closest to the station losing on street parking in front of their homes. This will create a parking lot feel to the low density neighborhood and be a detractor from potential buyers, negatively impacting home values.

Finally we do not support denser development in Kenwood, nor would it be feasible on any meaningful scale due to the mature and stable nature of the neighborhood. Any development would further denigrate the existing green space in the corridor, especially around the 21st St station.

We therefore dispute and challenge the SDEIS statement that mitigation for economic impacts is not warranted for the Kenilworth Corridor, particularly in the absence of any plausible property impact study.

Short-Term Direct and Indirect Economic Impacts

Comment: The SDEIS addresses only short-term economic impacts related to freight movements in the corridor. We assert that property owners in Kenwood would experience adverse economic impacts during construction; we are concerned that there will be a severe temporary degradation of property values due to the noise, traffic, vibration and uncertainties of the construction period, and we request that property assessments be reconsidered with the purpose of providing tax relief such as what was seen and acted upon during the upgrade of Highway 12 to Interstate 394. We request that a standard preconstruction survey be conducted on the route of construction vehicles or within the construction zone. We also request that there be a plan to ensure that school hours at the Kenwood School be respected – noise and activity should not take place in a manner that interrupts learning. Further, we request specification on what daily clean up and street sweeping would occur to minimize impact on the neighborhood.

3.4.4.2 Roadway and Traffic

As summarized in Table 3.4-1, there would be three new at-grade light rail crossings of roadways within the segment (Wooddale Avenue, Beltline Boulevard, and West 21st Street). At each crossing, light rail operations would impede vehicular traffic for approximately 50 seconds approximately 12 times per hour (six times per hour in both directions).

Comment: KIAA is concerned about emergency access being reduced 12 times per hour to East Cedar Lake Beach and the residences on Upton Avenue S. The freight train, which was originally to be removed, coupled with the light rail line, will exponentially impair access. We see no possible way to mitigate this impact even beyond the measures that are mentioned in the SDEIS. Police frequently need immediate access to the beach and park for the purpose of public safety and criminal matters; Water emergencies, fire, or medical emergencies would be exacerbated with each moment of delay. We see no possible way to mitigate this impact.

KIAA is concerned about the short-term impact on neighborhood roads that would be used for construction of the Kenilworth Corridor segment, including, but not limited to Penn Ave S, 21st St W. KIAA requests that funding be set aside for road repair

during and at the conclusion of construction to ensure that the burden of the cost of repair is not tendered to Kenwood residents via an assessment.

KIAA requests that passage of construction vehicles and materials through the neighborhood are limited to normal business hours to minimize neighborhood disruption. Please see Addendum #2 for the referendum passed by KIAA regarding the importance of this issue and we request some acknowledgement and plan for such mitigation during construction and repair post construction to any damage sustained to neighborhood housing or infrastructure.

3.4.4.3 Parking

Indirectly, the LPA could affect the supply of and demand for off-street parking in the St. Louis Park/ Minneapolis Segment due to development new light rail station areas. Any development occurring within the segment would, however, be required to comply with the City of St. Louis Park's and the City of Minneapolis' parking requirements, which would tend to ensure a long-term balance of parking supply and demand.

Comment: KIAA is concerned that there is complete disregard in the SDEIS for the impairment of on-street parking availability in its neighborhoods near the proposed 21st St Station for residents and their guests, as well as emergency access to those homes, especially in winter when streets are narrowed due to snow buildup. KIAA continues to oppose a park and ride lots at 21st St.

3.4.4.4 Freight Rail

Comment: Contrary to 15 years of previous planning, the SDEIS now claims that the need "to develop and maintain a balanced economically competitive multimodal freight rail system" as a justification for the Southwest light rail project (SDEIS page 1-1). The public, policy makers, and funders are generally unaware of this new "need" – one that has directed approximately \$200 million of the Southwest light rail budget to improving *freight* rail and making it permanent in the Kenilworth Corridor.

In 1998, when freight was reintroduced to the Kenilworth Corridor, freight was to be a temporary alignment until light rail could be built. Despite public agreements and related state funding, none of the responsible parties secured appropriate legal documentation to ensure that freight would be moved to make way for light rail. Many of the parties responsible for this serious and politically tainted "mistake" have been, and continue to be, deeply involved in the SWLRT planning process.

Since the Alternatives Analysis assumed that "freight would be relocated to make way for light rail," the financial, political, and environmental costs of addressing freight rail in the Kenilworth Corridor were not considered at this critical juncture. Neither Hennepin County nor the Met Council has ever conducted an honest and unbiased analysis of alternative ways to serve the southwest suburbs' transit needs.

When the City of Minneapolis was required to vote on alignment 3A as the proposed Locally Preferred Alternative (LPA), the City Council members were told that freight rail would be relocated and that LRT would run at-grade in Kenilworth. The costs and concerns of freight relocation were again ignored.

The Project Scoping Report for the 2012 Draft Environmental Impact Statement said clearly, "Freight Rail is independent of the Study." Although the Federal Transit Administration (FTA) noted this erroneous assumption when it approved preliminary engineering, neither Hennepin County nor Met Council ever amended the project scope to include freight rail.

When the City of Minneapolis was pressed to accept co-location in 2014, the City Council lacked critical information to make an informed decision because freight co-location with LRT and tunneling were never part of the original LPA and subsequent DEIS.

The present SDEIS does little to further the knowledge of risks to the environment and public safety of co-location of freight and SWLRT. It is remarkable more for what is not included than what is included.

Not addressed in this SDEIS are the following issues related to making freight permanent in the Kenilworth Corridor:

1) The current freight operator, TC&W, transports hazardous freight through Kenilworth, in very close proximity to homes, trails and parks. This freight includes such flammable and explosive products as ethanol, fuel oil, propane, and anhydrous ammonia. Should a derailment occur, the consequences could be catastrophic. The need for containment and evacuation plans is nowhere acknowledged in the SDEIS. The federal Freight Rail Administration (FRA) expects at least 10 to 20 oil or ethanol derailments annually. Nationwide, over 7000 train derailments occurred in 2014. These concerns are not just theoretical.

It is troubling that even after a multitude of concerns were raised by the City of St. Louis Park and its residents in response to the

relocation of freight proposed the 2012 DEIS, the current SDEIS does not contain one word acknowledging the presence or dangers of high hazard freight through the Kenilworth Corridor. There is evidently no safety plan should an ethanol or other hazardous materials freight derailment occur, and no containment and recovery planning should a disaster encroach on the tunnel and/or spill in to the Minneapolis Chain of Lakes.

2) TC&W is a private business and is free to operate as it deems appropriate. Since 1998 when freight was temporarily reintroduced, TC&W has significantly expanded the number of cars shipped through Kenilworth. The contents of these cars has also changed and will continue to do so as ethanol production increases – unit trains of 100 ethanol tankers have replaced short configurations of soybean and farm equipment carriers. Furthermore, the owners of TC&W are free to sell the company at any point to any one of the major railroads. This would cause an even greater expansion of traffic and movement of hazardous products in close proximity to homes. Upgrading the freight rail infrastructure at public expense and making it permanent increases the value of TC&W and thus increases the likelihood that it will be sold. Nowhere has this been made public.

3) Currently, TC&W trains voluntarily operate at a speed of 10 miles per hour through the Kenilworth Corridor. Our understanding is that they are under no legal obligation to do so. Going forward, the company may choose to sell to a company that does not respect this speed limit or TC&W may decide to increase speeds. A long-term enforceable agreement with the freight operator and the Hennepin County Regional Rail Authority should be considered as part of this project.

4) The Met Council has requested waivers from the Federal Rail Administration in order to put the jurisdiction of the co-located freight and light rail under the FTA. We see no evidence that the FTA or the Met Council have the capacity to oversee the co-location of hazardous freight and passenger rail in a narrow urban corridor.

5) The distance between the newly permanent freight rail and the light rail with its overhead electrical wires does not appear to respect industry standards or best practices. Even with crash walls, the proximity of electrified freight rail to passenger rail adds to safety risks. Catenaries can and do spark, which could be disastrous if it occurs when an ethanol tanker is passing. The risk may be low, but the consequences would be extreme.

6) Heavy freight rail obviously causes vibrations that travel through the ground. We see no evidence that the potential for long-term damage to either LRT structures or to residences and other buildings from freight vibrations has been considered in this SDEIS. Upgrading and making freight permanent increases the risks that freight vibrations will damage homes; KIAA therefore requests a pre-construction assessment of potentially affected properties and long-term monitoring with agreements that damage to residences will be compensated.

7) The SDEIS does not explore public sector liability if SWLRT or freight causes damage or harm. Currently, freight companies carry limited liability that only covers their rolling stock and train infrastructure. In light of the catastrophic potential of any accident in the Kenilworth Corridor, this insurance liability assessment should be done prior to building SWLRT, made public, and included in construction and operating cost estimates.

3.4.4.5 Bicycle and Pedestrian

Comment: The Minneapolis Park and Rec board reported in 2010 the Kenilworth Corridor receives 600,000 discrete unique visits per year. And the current “north woods” feel of the area enhances those visits. That experience would be significantly impacted by the addition of light rail, especially co-located with freight rail. This includes an expectation of natural quiet conditions. Pedestrians do not pass quickly through the park-like environment and will therefore be significantly impacted by added noise, movement and infrastructure of the LRT and freight rail. The speed joined with the noise at close proximity greatly detracts from the trail experience for both bicyclists and pedestrians, and can even be frightening to users. KIAA asserts that this clearly constitutes a long-term adverse impact on bicycle and pedestrian experience in the Kenilworth Trail and must be mitigated to the greatest extent possible.

There is also a concern for safety at crossings, and a poor precedent set by previously constructed light rail lines on what we might expect. We find this photo to be an example of an unacceptable measure of safety:



As previously stated, is there any concern of having live wires for light rail within 25 feet of an active ethanol freight line? We ask for consideration on this matter per Rep Hornstein’s statement at the Dunwoody SWLRT hearing.

3.4.4.6 Safety and Security

Comment: KIAA is concerned about the difficulty of providing emergency services to LRT users and freight trains throughout the Minneapolis portion of the corridor. There is limited operational infrastructure in the corridor (e.g., lack of hydrants), and few access points for emergency vehicles. In particular, we expect that the 21st Street access point will have to be used by police cars, fire engines, and ambulances to service points between the Kenilworth Lagoon and the Penn Avenue station. We request and urge the Council to design access in a minimally intrusive way, and consider mitigation that will limit the impact of these public services on the neighborhood.

LONG-TERM IMPACTS

Comment: The current plan to co-locate freight and LRT within the same corridor — within a dozen feet of each other in certain places — creates new, potentially catastrophic hazards. It is currently proposed that the freight train (which carries volatile and explosive ethanol on a daily basis, and several unit trains of ethanol per month) remain permanently in the Kenilworth Corridor. The addition of the SWLRT with its electrical power wires only a few feet away exacerbates the existing danger of ethanol in the corridor. Current safety standards recommend against co-location in such close proximity when there are alternatives; other alternatives for this SWLRT alignment must be explored.

Furthermore, in the event of an explosion of ethanol trains along this corridor, we understand that the foam retardant required to extinguish the fire is “within a 3 hour distance” of the corridor. We believe that the potential harm during that “3 hour window” along with permanent damage to residences and residents should be quantified. Should an explosion occur during the passing of an LRT train, the potential exists for loss of life or harm to those exposed to the hazardous fumes.

Comment: Please note that the Minneapolis Park Police also provide service within the study area. KIAA requests that the MPRB Police be consulted on security issues related to the impact of a proposed station at 21st Street on East Cedar Lake Beach (Hidden Beach) and their input be incorporated into final design plans. In the summer 2012, Hidden Beach generated more police actions than any other park in the MPRB system. For the last five years, KIAA has provided supplementary funding to the Park Police to allow for increased patrols in this area. The neighborhood has expressed grave concern that an inadequately managed station would increase opportunities for illegal behavior. To reduce the risk of such behavior we request that the Met Council study whether it be appropriate for service at 21st St station cease at 10PM, which coincides with the normal evening closure of Cedar Lake Park.

SHORT-TERM IMPACTS

Cedar Lake Parkway is a critical artery for Kenwood residents and others. Currently, rush hour traffic produces backups that sometimes extend from Lake Street, along Dean Parkway and Cedar Lake Parkway. (On June 11, 2015, an accident at Dean Parkway and Lake Street slowed traffic on Dean Parkway to a crawl for over an hour.) The closing of Cedar Lake Parkway at the Kenilworth Trail would be necessary during the construction of the proposed tunnel from West Lake Street to just past Cedar Lake Parkway. Affected neighborhoods already have limited entry and exit points.

The SDEIS does not address the need to ensure reasonable transportation options during this period. Especially important are routes for emergency vehicle access. There must be plans for fire and ambulance routes in the affected neighborhoods. Travel time for emergency vehicles would be increased during that closing. The SDEIS describes such delays as “minor”; we take vigorous issue with such a demotion of safety concerns, as even two minutes could be the difference between life and death, or a home being saved from fire or destroyed.

Also missing is information on what measures, including evacuation plans, would be necessary to protect the Cedar Shores townhomes when the TC&W trains, with their explosive freight, are moved several feet closer to them during construction.

Appendix – Addendum #1

Addendum: Kenwood Isles Area Association Position Statement on Freight Relocation for SWLRT

Adopted July 1, 2013

Nearly a mile of the proposed SWLRT runs through the Kenwood Isles Area Association neighborhood. **We vehemently oppose the idea of maintaining freight rail along with light rail at grade in the Kenilworth Corridor, known as “co-location.”**

Relocation of freight out of the Kenilworth Corridor has been promised for years. While the corridor was long used for transporting goods, freight use of Kenilworth was halted in 1993 when the Midtown Greenway was established. When freight was later re-introduced into the Kenilworth Corridor, Hennepin County assured residents this use of the corridor was temporary.

Meanwhile, over 20 years of citizen efforts to build and maintain Cedar Lake Park and the Kenilworth Trail have resulted in a more beautiful and complete Grand Rounds and Chain of Lakes. Traffic on federally funded commuter and recreational bicycle trails in the Kenilworth Corridor grew to at least 620,000, perhaps approaching one million, visits in 2012.

When the Hennepin County Regional Railroad Authority began looking at using the Kenilworth Corridor for LRT, several key studies and decisions reiterated the expectation that if Kenilworth is to be used for transit, then the freight line must be relocated. (See notes below.) Trails were to be preserved. Freight rail was to be considered a separate project with a separate funding stream, according to Hennepin County. This position was stated publicly on many occasions, including Community Advisory Committee meetings and Policy Advisory Committee meetings.

Minneapolis residents have positively contributed to the SWLRT process based on the information that freight and light rail would not co-exist in the Kenilworth Corridor. Although many of us think that Kenilworth is not the best route, most have participated in the spirit of cooperation and compromise to make the SWLRT the best it can be.

Despite numerous engineering studies on rerouting the freight rail, it was not until December 2012 that the current freight operator in the Kenilworth Corridor, TC&W, decided to weigh in publicly on the location of its freight rail route. TC&W rejected the proposed reroute.

The Met Council has responded by advancing new proposals for both rerouting the freight and keeping it in the Kenilworth Corridor. For either option, these proposals range from the hugely impactful to the very expensive – or both. Six of the eight proposals call for “co-location” despite the temporary status of freight in Kenilworth. The Kenilworth proposals include the destruction of homes, trails, parkland, and green space. Most of the proposals would significantly add to the noise, safety issues, visual impacts, traffic backups, and other environmental impacts identified in the DEIS.

This is not a NIMBY issue. The Kenilworth Trail provides safe, healthy recreational and commuter options for the city and region. It is functionally part of our park system. The Kenilworth Corridor is priceless green space that cannot be replaced.

For over a decade public agencies have stated that freight rail must be relocated to make way for LRT through the Kenilworth Corridor. If this position is reversed midway through the design process for SWLRT, the residents of Kenwood Isles would find this a significant breach of the public trust.

Simply stated, none of the co-location proposals are in keeping with the project goals of preserving the environment, protecting the quality of life, and creating a safe transit mode compatible with existing trails.

This has been a deeply flawed process, and we **reject any recommendation for at-grade co-location in the Kenilworth Corridor. If freight doesn't work in St. Louis Park, perhaps it's time to rethink the Locally Preferred Alternative.**

Notes

1) The 29th Street and Southwest Corridor Vintage Trolley Study (2000) noted that, "To implement transit service in the Southwest Corridor, either a rail swap with Canadian Pacific Rail or a southern interconnect must occur."

2) The FTA-compliant Alternatives Analysis (2005-2007) defines the Kenilworth section of route 3A for the proposed Southwest Light Rail in this way: "Just north of West Lake Street the route enters **an exclusive (LRT) guideway in the HCRRA's Kenilworth Corridor to Penn Avenue**" (page 25). This study goes on to say that "to construct and operate an exclusive transit-only guideway in the HCRRA's Kenilworth Corridor the **existing freight rail service must be relocated**" (page 26).

3) The "Locally Preferred Alternative" (LPA) recommended by HCRRA (10/29/2009) to participating municipalities and the Metropolitan Council included a recommendation that freight rail relocation be considered as a separate "parallel process."

4) In adopting HCRRA's recommended Locally Preferred Alternative based on treating relocation of the freight rail as a separate process, the City of Minneapolis' Resolution (January, 2010) stated:

"Be It Further Resolved that the current environmental quality, natural conditions, wildlife, urban forest, and the walking and biking paths be preserved and protected during construction and operation of the proposed Southwest LRT line.

Be It Further Resolved that any negative impacts to the parks and park-like surrounding areas resulting from the Southwest LRT line are minimized and that access to Cedar Lake Park, Cedar Lake Regional Trail, Kenilworth Trail and the Midtown Greenway is retained."

5) The Draft Environmental Impact Statement supports the Locally Preferred Alternative, which includes relocation of freight out of the Kenilworth Corridor. (December, 2012)

6) The **southwesttransitway.org** has stated since its inception that:

Hennepin County and its partners are committed to ensuring that a connected system of trails is retained throughout the southwest metro area. Currently, there are four trails that may be affected by a Southwest LRT line. They are the

Southwest LRT trail, the Kenilworth trail, the Cedar Lake Park trail, and the Midtown Greenway. These trails are all located on property owned by the HCRRRA. The existing walking and biking trails will be maintained; **there is plenty of space for light rail and the existing trails.** Currently, rails and trails safely coexist in more than 60 areas of the United States.

End of Addendum

Appendix: Addendum #2

January 5, 2015

Resolution to Recommend Review of Metropolitan Council's Policy Regarding Project Administration and Accountability to Property Owners

WHEREAS, It has come to the attention of the Kenwood Isles Area Association (KIAA) that a number of homeowners in the Cedar-Isles-Dean neighborhood apparently suffered damage to their properties as a result of the Metropolitan Council's Cedar-Lakes Sewer Improvement Project (MCES Project No. 804122), and

WHEREAS, Neither the Metropolitan Council's contractor nor the Metropolitan Council Environmental Services have taken responsibility or satisfactorily addressed CIDNA homeowners' documented property damage claims, and

WHEREAS, This lack of accountability leads to legitimate concerns about this and all other projects the Metropolitan Council administers, especially the construction and operation of the proposed Southwest Light Rail Transit (SWLRT), and

WHEREAS, This dereliction of responsibility with regard to property damage will potentially affect all properties – public, park or private property alike - along the 16-mile proposed SWLRT route.

THEREFORE BE IT RESOLVED, That the KIAA Board of Directors urgently requests that the Metropolitan Council review its policies for resolving property damage disputes resulting from its construction projects and its role in administering projects;

BE IT FURTHER RESOLVED, That based on this review and before construction begins on the SWLRT, the KIAA Board of Directors urges the Metropolitan Council to put clear and reasonable processes in place to resolve damage disputes and fairly compensate property owners who experience damage as a result of Metropolitan Council projects.

From: [KIM and KENNY](#)
To: [swlrt](#)
Subject: SWLRT comment
Date: Monday, July 20, 2015 2:09:52 PM

SWLRT Supplemental Draft Environmental Impact Statement comment

SWLRT Public Process

The SWLRT public process is seriously flawed when the governmental bodies decided on the projects alignment, had meetings behind closed doors, actually asked various municipalities involved to vote in favor of the project before the entire EIS process was completed. It is apparent that many citizens voices are not being heard. Many people living in the neighborhood were not informed of the SWLRT plans until it was already a done deal. Please address the following questions and concerns.

Questions:

- Will the various municipalities involved in the SWLRT project be taking a final vote on this project after the EIS process is complete?
- What alternative route plans were available for municipalities to review at the time of the vote to approve the current SWLRT alignment?
- If there is not another review and vote by municipalities should one conclude the project is already rubber stamped for approval without municipalities having up to date information on alternatives routes and environmental impacts?

SWLRT Alternatives Routes

To say that governmental bodies seriously explored other viable routes than the current SWLRT preferred plan is an immeasurable understatement. Light rail projects need to be built in high density population areas. The preferred SWLRT route plans and data were much more detailed than the other viable alternative routes; these plans were inadequate and not explored in depth with supporting data.

Please explain why the following alternative SWLRT routes were not seriously considered by providing comprehensive plans and detailed data equivalent to the current preferred SWLRT planned route to support rejecting the following viable alternative routes; where there is high density of population and significantly less potential for environmental damage.

- The Mid-Town Greenway an existing trail that runs east to west for many miles
- Lake Street connects the cities of Minneapolis and St.Paul and serves a high density population neighborhoods
- Using Lagoon Ave, 31st Street, 28th and 26th Streets in conjunction with the Lake Street option
- Cedar Lake Trail an existing train route that runs east and west for many miles

from downtown Minneapolis to western suburbs

- Highway 55
- Highway 394
- Highway 100

Environmental concerns surrounding Cedar Lake and Lake of the Isles

The groundwater in the area of Cedar Lake is very shallow. It appears as though the deciding government bodies for this project doesn't remember what recently happened at 1800 Lake Street Apartments in Minneapolis. Millions of gallons of groundwater spewed into the garage area of the apartments for many months then it was redirected into the channel of Lake of the Isles. After lawsuits were settled the developer was instructed to fix the groundwater issue. Please provide information on what preventative steps will be taken to ensure the groundwater in the area of SWLRT project will be protected and not abused.

Questions:

- How will the SWLRT construction process protect groundwater and the lakes from pollution?
- How many gallons of groundwater will be pumped and redirected?
- Will this project send recharged groundwater back into the aquifer?
- Is there money in the SWLRT **budget** for mitigating groundwater intrusion? If so how much?
- Will groundwater be wasted and diverted into our lakes, creeks, streams, wetlands?
- How will construction around Cedar Lake effect subterranean species?
- What endangered species, flora, fauna have been found and studied? Were experts in the specific areas of these individual species consulted? How will these species be protected?

Effect on property owners and condemnation of properties in the path of project

Questions:

- How will the project negatively impact or compromise adjacent homeowners property?
- Where are the specific plans of what homes will be impacted? Include addresses.
- Are there plans to compensate homeowners for damages to there properties, if so how will this be done?
- How much money is in the SWLRT **budget** for homeowner repairs and condemnation of properties in the path of project?

How will homeowners who will be displaced be compensated?

- How and who will actually determine the net worth of the displaced homeowners home values and relocation expenses?
- Who will be the governing body to pay displaced homeowners and how will that complete process work from beginning to end?

I am vehemently opposed to building the SWLRT in the Cedar Lake corridor. The environmental risks associated with this pristine urban forest is not worth building SWLRT in this location. In addition, there will be virtually no ridership in this area.
Please send me an immediate confirmation that you have received my comments.

Thank you
Kim Ramey
2007 Ewing Ave. South
Minneapolis, MN. 55416
7-20-2015

From: [KIM and KENNY](#)
To: [swlrt](#)
Subject: SWLRT SDEIS comment
Date: Monday, July 20, 2015 10:42:08 PM

SWLRT Supplemental Draft Environmental Impact Statement comment

The Minnehaha Creek flows directly into Cedar Lake from Lake Minnetonka. The thought that the proposed construction of the current SWLRT preferred plan would only potentially effect Cedar Lake or the surrounding city lakes is short sighted. There have been several incidents around the world of lake water being diverted or lake water disappearing during the construction process, earthquakes and drilling operations. The Earth is experiencing accelerated climate change which now yields more frequent calamitous weather events. Please answer the following questions and concerns.

- Will Cedar Lake, Minnehaha Creek, Lake Minnetonka, Lake of the Isles water levels be monitored and measured during the construction process?
- Has there been baseline water levels measured in the Minneapolis city lakes and Lake Minnetonka? If not when will the baseline measurements be completed before construction begins?
- How often and at what specific locations will lake water measurements be calculated during construction? And how long after construction is complete?
- What is the depth of the groundwater at Cedar Lake in the effected area where SWLRT preferred plan is being constructed?
- How many feet apart around Cedar Lake were groundwater depths calculated?
- During the construction process of SWLRT explain in depth what studies have been completed regarding pile driving around Cedar Lake?
- How many piles will be used around Cedar Lake and at what depth?
- How have the incidents surrounding other lakes around the world of water disappearances or water diversion been studied? What lakes were used to study this phenomenon?
- What studies have been done regarding the issues surrounding broken lakes seals causing the lake water levels to be diverted or disappear?
- In the case of a catastrophic environmental event of diverted or disappearing lake water which direction and where would this water go?
- Is there an emergency plan in place to deal with an unforeseen catastrophic environmental events? If so; Is the emergency plan in the current budget?
- Have the subterranean soils identified around Cedar Lake been studied for the viability to withstand the harsh environmental intrusion of construction process?
- How will the soil around the lake area be altered?

- What will soil correction cost?
- What matter will be used to stabilize soil around the lake area and will this matter be environmentally safe to use around lake water?
- How will altering soil conditions around Cedar Lake effect/protect subterranean species?
- What studies have been done on the effect of hydrostatic pressure during the construction process and after when the trains are fully operational around Cedar Lake?
- What will be the effect of hydrostatic pressure caused by the weight and vibration of the frequently passing trains on Cedar Lake and surrounding areas?
- Are there endangered species, fauna, flora in the SWLRT preferred plan construction route?
- What studies were done by Cedar Lake to assess the effect of changing the landscape of this environmentally sensitive urban forest on migratory birds, butterflies, bees?

Thank you

Mr. & Mrs. Kenneth Ramey

2007 Ewing Ave. South

Minneapolis, MN. 55416

From: [Lynn Levine](#)
To: [swlrt](#)
Cc: Sophia.Ginnis@metrotransit.org; [Mockovciak, James](#)
Subject: SWLRT Supplemental Draft Environmental Impact Statement comments
Date: Monday, July 20, 2015 5:40:13 PM

SWLRT Public Process

This process was "democracy" at its worst. My understanding, after attending court hearings in a lawsuit to stop this bad alignment, is that governmental bodies decided on the project's alignment, had meetings behind closed doors, actually negotiated with various municipalities about the alignment to gain a favorable vote, and did all this behind closed doors in secret meetings. This hypocrisy took place before the EIS process was completed! To add insult to injury promises and commitments were made and certain routes eliminated with no regard to the real question about which route would be best for the environment. Voices of citizens took a back seat, at best, and many citizens were not informed or misinformed in the planning stages. Sadly, those most affected by the poor choice of route, including those who may lose their homes, were kept out of the process. We believe they were deliberately kept out. We are asking that the following questions be answered:

Questions:

- Will the various municipalities involved in the SWLRT project be taking a final vote on this project after the EIS process is complete?
- What alternative route plans were available for review at the time of the vote to approve the current SWLRT alignment?
- If there is not another review and vote by municipalities should one conclude the project is already rubber stamped for approval without municipalities having up to date information on alternatives routes and environmental impacts?

SWLRT Alternatives Routes

Governmental bodies did not seriously explore other viable routes, alternatives to the current SWLRT preferred plan. Light rail projects need to be built in high density population areas. The preferred SWLRT route plans and data were much more detailed than the other viable alternative routes; these plans were inadequate and not explored in depth with supporting data.

The plan was driven by the fact that money was available, instead of the other way around (seeking money for a good plan). As a result so much money is already invested that going over budget (by a lot) becomes a selling point, instead of a detaining point. In other words, cutting some of the excess off the bloated budget is portrayed as a "saving" rather than admit the entire plan is flawed.

Please explain why the following alternative SWLRT routes were not seriously considered by providing comprehensive plans and detailed data equivalent to the current preferred SWLRT planned route to support rejecting the following viable alternative routes; where there is high density of population and significantly less potential for environmental damage.

- The Mid-Town Greenway an existing trail that runs east to west for many miles
- Lake Street connects the cities of Minneapolis and St.Paul and serves a high density population neighborhoods
- Using Lagoon Ave, 31st Street, 28th and 26th Streets in conjunction with the Lake Street option
- Cedar Lake Trail an existing train route that runs east and west for many miles from downtown Minneapolis to western suburbs
- Highway 55
- Highway 394
- Highway 100

Environmental concerns surrounding Cedar Lake and Lake of the Isles

The groundwater in the area of Cedar Lake is very shallow. It appears as though the deciding government bodies for this project doesn't remember what recently happened at 1800 Lake Street Apartments in Minneapolis. Millions of gallons of groundwater spewed into the garage area of the apartments for many months then it was redirected into the channel of Lake of the Isles. After lawsuits were settled the developer was instructed to fix the groundwater issue. Please provide information on what preventative steps will be taken to ensure the groundwater in the area of SWLRT project will be protected and not abused. Further, the Chain of Lakes has taken serious hits in the past, starting with the selling of the spring that feeds Cedar Lake to Prudential. The cumulative effects of this, the Ewing Wetland "compromise" granting permission to destroy a working wetland based on false facts presented to agencies and the current plan must be considered. An "acceptable" environmental impact should consider a starting point where our lakes were healthy. Instead, past damage is touted as a lower bar for impact evaluation.

Questions:

- How will the SWLRT construction process protect groundwater and the lakes from pollution?
- How many gallons of groundwater will be pumped and redirected?
- Will this project send recharged groundwater back into the aquifer?
- Is there money in the SWLRT **budget** for mitigating groundwater intrusion? If so how much?
- Will groundwater be wasted and diverted into our lakes, creeks, streams, wetlands?
- How will construction around Cedar Lake effect subterranean species?
- What endangered species, flora, fauna have been found and studied? Were experts in the specific areas of these individual species consulted? How will these species be protected?
- Will there be any penalties for sudden realizations that the impacts were greater than predicted (which they usually are).

Effect on property owners and condemnation of properties in the path of project

Questions:

- How will the project negatively impact or compromise adjacent homeowners property?

- Where are the specific plans of what homes will be impacted? Include addresses.
- Are there plans to compensate homeowners for damages to their properties, if so how will this be done?
- How much money is in the SWLRT **budget** for homeowner repairs and condemnation of properties in the path of project?
- How will homeowners who will be displaced be compensated?
- How and who will actually determine the net worth of the displaced homeowners home values and relocation expenses?
- Who will be the governing body to pay displaced homeowners and how will that complete process work from beginning to end?

My neighbors and I are vehemently opposed to building the SWLRT in the Cedar Lake corridor. The environmental risks with destroying this pristine urban forest are surely going to be much more than predicted by a biased group of proponents. There is a lawsuit still pending about the flawed process, and as usual, citizens are being taxed to pay for attorneys fighting against us. In addition we have to chip in our own money to pay our lawyers. Furthermore, aside from environmental risks the alignment is (forgive my bluntness) stupid. There will be virtually no ridership here.

Please send me an immediate confirmation that you have received my comments.

Thank you for reading and responding to these comments.

Lynn Levine
1941 Ewing Avenue South
Minneapolis, MN 55416

From: [Gail Freedman](#)
To: [swlrt](#)
Subject: SWLRT through Kenilworth
Date: Monday, July 20, 2015 12:52:12 PM

Hi,

I'm writing to beg you to redirect this route to save our precious natural resources. Put the rail somewhere else, not through our beautiful biking/walking paths.

I appreciate it!

Thank you.

Gail Freedman
Bryn Mawr neighborhood of Minneapolis, MN
28 Thomas Ave So
Mpls, MN 55405

From: [Bill McGaughey](#)
To: [swlrt](#)
Subject: SWLRT
Date: Monday, July 20, 2015 10:11:57 AM

I live in Harrison neighborhood and am still in favor of building a light-rail line to the southwest suburbs.

William McGaughey

From: [Erin Cosgrove](#)
To: [swlrt](#)
Subject: Comment to the SDEIS
Date: Tuesday, July 21, 2015 11:59:02 AM

My comments to the SDEIS are the same as Safety in the Park (attached):

Regarding co-location options omitted from the SDEIS (why is a mystery to all common-sense folks):

Add the most simple solution back into the SDEIS: Move the bike trail out of the corridor!

Save money by doing this too.

At least one of the co-location options that do not involve tunnels should remain in the list of viable options and/or all relocation options should be removed from contention after the step one evaluation. Due to the signed 1998 City of Minneapolis agreement with the Hennepin County Regional Rail Authority (HCRRA) to move the bike trail when the Kenilworth Corridor is needed for transit the most likely option to retain would be relocation of the bike trail.

Thank you,

Erin Cosgrove

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

Ms. Nani Jacobson,

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

Michael Corbett, PE

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

July 21, 2015

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

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

Dear Ms. Jacobson:

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

Commuter and Passenger Rail

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

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

Noise

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

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

Water Resources

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

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

Design

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

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

Right-of-Way and Permits

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

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

Sincerely,

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

Copy via Email

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

From: [robert carney](#)
To: [swlrt](#)
Subject: Public Comment for Southwest LRT SDEIS
Date: Tuesday, July 21, 2015 7:24:20 AM
Attachments: [public comment -- Southwest LRT SDEIS -- FINAL.pdf](#)

My public comment is the attached .pdf file.

Please confirm that this submission has been received. Thank you.

Bob "Again" (bobagain) Carney Jr.
4232 Colfax Ave So
Minneapolis, MN 55409

bobgaincarneyjr@gmail.com

cell phone: (612) 812-4867

Public Comment submitted by Bob “Again” (bobagain) Carney Jr., -- re: Supplemental Draft Environmental Impact Statement for the proposed Southwest Light Rail Line

Preface –

My focus in this public comment is to highlight and explicate what I regard as four fundamental facts.

First, there are alternative alignments available that would be far preferable to the current plan being advanced by the Metropolitan Council. For this reason, the Southwest LRT project should be sent back to the scoping phase – alternatives need to be considered, and one needs to emerge as a real Locally Preferred Alternative. Referring to the current Alignment as a “Locally Preferred Alternative” is laughable – if only for the fact that co-location was not an element of the design when it was chosen.

Second, the so-called “no-build” option is also a reasonable alternative. For this point, I want to emphasize that “no-build” should not be seen as “doing nothing.” Rather, it should be seen as a preference for study and careful consideration of all of the options available to us in Minnesota, and the Twin Cities.

Third, I think the whole idea of focusing on a “corridor” is a fatal flaw in the entire planning process. We need to view transportation, and Transit, as a **system**. In my presentation of what I see as a preferable alternative alignment and plan, I persistently emphasize how what I am suggesting makes sense in the broader context of a Transit and transportation **system** that is optimal for our Twin Cities. I see this perspective as being essentially absent from the SWLRT planning process – that is very unfortunate.

Fourth, the current Southwest LRT plan has -- in effect – been given a “vote of no confidence” by the Legislature. If the Metropolitan Council persists with their current funding scheme, the inevitable result will be a confrontation with the Legislature next session – one that the Council can’t possibly win, but with the potential to disrupt an opportunity for Minnesota to fully provide for our roads and bridges needs for the next decade. This is covered in more detail shortly – presented in my most recent Star Tribune Editorial Counterpoint article.

If Light Rail is to be introduced at all in this corridor, I would prefer to develop a plan that would be eligible for Federal funding. But let me be blunt: I think the current plan is **so bad** that it may be better to implement a LRT solution that represents the best overall solution in the context of a Transit and transportation **system** for the Twin Cities, even if the plan turns out **not** to be eligible for Federal

funding, according to current formulas. Our main priority can and must be doing what is best for the Twin Cities and Minnesota – not making what really amount to a whole series of bad choices because they “qualify” us for Federal dollars. Unfortunately, I think that is a good summary of the whole history of the SWLRT project. If it emerges that the best plan from a Transit and Equity perspective is ineligible for Federal funding, we should challenge the current formulas, both through the political process, but also in court. If the current formula can be shown to result in sub-equitable LRT systems, that is unacceptable and unjust. Let’s not be afraid to speak that truth.

I am especially concerned – frankly both upset and angry – about the idea of using what either is -- or should be -- park land, because it is seen as a “cheap” or “convenient” option. I have studied the history of Minneapolis and our Park System extensively; it is truly a unique and amazing history. As an example of this study, I encourage you to visit my web site, www.bobagain.com, and view my featured video on the history of our park system.

We have traditionally thought ahead a hundred years, and have been successful in coordinating both good stewardship – an idea rooted in and derived from our Judeo-Christian values -- and economic and business interests. The current SWLRT plan, and the whole history of the project, is nothing short of an assault on that history. The Kenilworth corridor is – on a “de facto” basis – a park. **GO LOOK AT IT!** Walk or bike through it! Throughout our history, our approach to this situation would be to concentrate on acquiring this land as park land, and developing it as part of our park system. That’s what we should do now. I think there is an area near the proposed Penn Station that could and should be developed as a combination of residential and commercial development, and that can be linked to downtown with outstanding transit resources. Running Light Rail through the Kenilworth Corridor is NOT the way to do this!

An assessment of Minnesota’s current situation regarding roads and bridges, and transit

Below is the text of my most recent Star Tribune op-ed article – published July 13th in the print edition – it includes in summary form the outline of the Alternative Alignment that comprises most of this Public Comment:

TITLE OF STAR TRIBUNE ARTICLE: Southwest light-rail plans unrealistic

In two recent editorials this paper lamented the 2015 Legislature’s failure to meet Minnesota’s transportation challenges and celebrated the latest not-dead-yet Southwest light-rail plan,

wrapped in shiny new duct tape (“Minnesota sputters in roads, transit race,” July 6; “Civic sacrifice keeps Southwest on track,” July 8).

Those editorials are unrealistic. Let’s survey what the Legislature and Gov. Mark Dayton could agree to next year — and what is out of reach.

Fortunately our state transportation commissioner — self-described “old bus guy” Charlie Zelle — is respected and trusted by all.

Zelle told the House Transportation Committee in January that without reliable funding he could not responsibly choose more expensive but also more cost-effective options. When a budget is too tight, only short-term band-aid solutions are possible. DFL Rep. Ron Erhardt — a former Republican Transportation Committee Chair — took Zelle’s cue, proposing a constitutional amendment to permanently dedicate new funding. Expanded bonding authority could be included in that amendment.

Zelle’s prudence, reliable management and realistic numbers are the foundation for the real lead story from this year’s session: Dayton and House Republicans agree about the billions needed for a decade of adequate and effective spending on roads and bridges.

All things considered, this represents real progress — it’s not a “giant step backward.” Next year our Legislature and governor can, should and might agree to fund roads and bridges for one year, followed by a November constitutional vote to provide the decade of reliable funding Zelle insists on.

As a registered lobbyist for “We the People,” I promoted the Legislature’s decision to cancel an earlier \$30 million Southwest LRT appropriation — repurposing those dollars for Metro Transit operations. That plan — the best available option as the session wound down — ensured that Metro Transit could avoid service or job cuts.

At the special session House Speaker Kurt Daubt confirmed to me that with only \$15 million of state money now appropriated (\$150 million less than planned), there will be no more state Southwest LRT money in 2016.

This brings me to the bad news. Based on my lobbying work with dozens of legislators, it’s clear that Minnesota’s transit challenge simply cannot be solved next year.

The current transit sales tax system — now heavily favoring Hennepin County — is losing support from other counties. The Chamber of Commerce supported the new quarter-percent transit sales tax in 2008; today they oppose any increase. And that was before the most recent Southwest LRT planning disasters.

This paper's editorials implicitly acknowledged these transit obstacles — noting that when the DFL controlled both Houses and the governor's office, no transit sales tax increase was approved.

If light rail is to go forward at all, a new framework is needed, possibly including public-private partnership elements and light-rail tax districts.

Unfortunately, the Met Council is choosing to ignore our elected governor and Legislature. Their Southwest LRT finance plan now includes "Certificates of Participation" — backed by anticipated tax revenue — to be sold if (make that when) the Legislature doesn't provide more money next year.

Fortunately, we have alternatives.

One Southwest LRT option could start in Hopkins (supplemented beyond by buses), follow the Greenway (below grade) — surfacing at a giant Interstate 35W Transit Hub linking with I-35W MNPass bus service and the Lake Street and Nicollet lines — and then (elevated) follow the freeway corridor to Franklin, a Convention Station, and finally to Royalston and Target Field Stations.

Light rail can and should make all Minneapolis stadiums and arenas — and the nearby U of M — extensions of our convention facility. Convention visitors quickly could go to the heart of our amazing park system, to the airport and to the Mall of America. Special Blue Line trains could continue along the same track to the Convention Station when major conventions are here.

Let's send Southwest LRT back to the drawing board, and take an honest look at all our options — including bus-based alternatives. Let's not let a light-rail bureaucratic steamroller crush Minnesota's opportunity to fully fund our needed road and bridge work for the next decade.

Bob "Again" Carney Jr. is a transit advocate in Minneapolis.

Proposed Alternative Alignment for Southwest LRT

Briefly, as outlined in the above op-ed article, I am suggesting the following be considered, as **one** example of an alternative alignment that is clearly so far preferable to the current plan that the current plan simply **must** be scrapped:

Part A: Core elements integral to the Alternative Alignment SWLRT project:

1. Stop the line at either Shady Oak, or Downtown Hopkins – preferably at Shady Oak.
2. Link the current Southwest Station, and an Eden Prairie Center Transit Hub, including a system of shopping and extended stay traveler routes, with direct, point-to-point bus service to the last Hopkins LRT station.
3. Provide high frequency (five minutes or better) commuter bus service from the last Hopkins LRT station to job sites throughout the Golden Triangle.
4. For Hopkins, Saint Louis Park and the Golden Triangle, provide subsidized Car2Go service.
5. Provide radically better reverse commuter service to the entire Southwest quadrant (roughly defined by I-35W and I-394), with greatly improved links to low income neighborhoods having high concentrations of people of color -- in both North Minneapolis and the near South side of Minneapolis.
6. Build a Transit Hub linking Highway 100, Highway 7, and the LRT, and including a large and expandable park and ride facility (this can be excluded or deferred based on budget considerations).
7. Build a Transit Hub linking Highway 169 and the LRT, and including a large and expandable park and ride facility (this can be excluded or deferred based on budget considerations).
8. As an equity element integral to this system, provide high-frequency service (five minutes or better) on the entire length of West Broadway in North Minneapolis, and high frequency (five minutes or better) one-stop freeway service from West Broadway and I-94 to the Greenway & I-35W Hub (the one stop is at the 12th Street and Hennepin Station, to link to reverse commuter routes in the Southwest quadrant).
9. The overall plan includes a series of Transit Hubs; although all of the Uptown and North Hubs, and part or all of the Convention Hub and the Greenway & I-35W Hub should be part of the LRT project's budget, the other hubs should not be part of this project's budget. The series of Transit Hubs will be linked with elevated bus-only transit ways and freeways, and will include park-and-ride ramps. These are designed to link LRT service with both bus service and... gasp...

people who drive cars. The four Hubs nearest downtown are also designed as points from which people can board small vehicles dispatched at very high frequency (2-3 minutes during rush hour, five minutes other times) to make all points in downtown an easy walk (in most cases 1/8 of a mile or less, never more than a quarter mile).

10. The Twin Cities is known for providing excellent biking resources, including trails, bike racks on all buses, the ability to roll on and off light rail, and most recently the Nice Ride system. However, the ability to shop using transit is severely limited, due to the difficulty of bringing shopping carts on buses. The current design of LRT vehicles -- with roll-on-roll-off ability -- can and should be combined with specially designed and equipped shopping buses, with scheduled runs planned around LRT corridors, and designed to greatly expand shopping opportunities, especially for transit-dependent communities – again, North Minneapolis and the near South side of Minneapolis. This is also fundamentally an equity issue, and should be treated as such, including for budget and ridership purposes.
11. An elevated, all season bicycle “sky-bi” system. Because the LRT is elevated from the Greenway & I-35W Hub to downtown, it will be easy to add an elevated, all-season bicycle “sky-by” route on top. This will be connected to similar elevated, all-season “sky-bi” routes on top of the elevated bus transit ways that connect the Transit Hubs that circle downtown. It might make sense to add a canopy above the Greenway bike path, allowing it to be enclosed with sides installed like storm windows during winter months. Of course because bikes can so easily be rolled on and off LRT, the result will be an integrated bike-and LRT system. Additional “sky-bi” only grid elements can be added within the downtown Transit Hub “sky-bi” perimeter – and of course, Nice Ride bikes can be made available year round throughout the system. The result will be greatly increased year-round mobility within a system having a backbone comprising the LRT routes.
12. From West Lake to Downtown, use a modified version of the “3C” alignment, considered earlier in the SWLRT process, but dropped partly because “a tunnel under Nicollet would be too expensive” (the tunnel is now proposed for Kenilworth). Several additional elements not detailed here are included as integral to the Alternative Alignment plan – one example is a Transit Hub linking LRT with BRT service on I-35W. This part of my proposed Alternative Alignment will be considered following the Part B summary.
13. Cancel the proposed Bottineau LRT – instead, provide guaranteed congestion-free service with an elevated bus transit way above Broadway, following the Bottineau corridor to Highway 100.

Beyond Hwy 100 we can ensure a congestion-free system by using MNPass lanes and/or a variant of dedicated bus shoulders. This is included as an element in the current plan, because the Blue Line can then be extended along the alternative “3C” alignment, providing five minute service from the Downtown East station to at least the Uptown Transit Hub, or beyond – possibly all the way to Shady Oak.

Part B: Additional transit and transportation elements and considerations

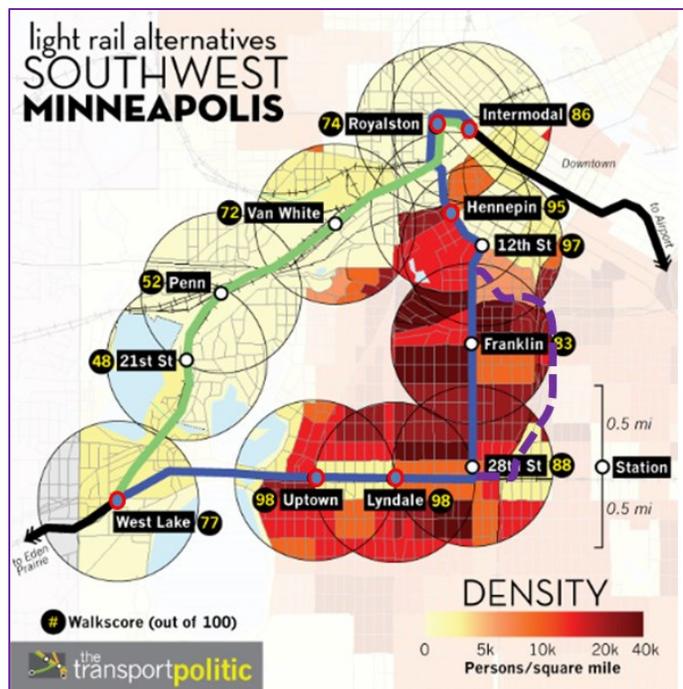
14. **Additional element** – As noted, a series of Transit Hubs; the cost of the Convention Hub and the Greenway & I-35W Hub may be partially outside of this project’s budget, the other Hubs should be entirely outside of the budget. The series of Transit Hubs will be linked with elevated bus-only transit ways and freeways, and will include park-and-ride ramps. These are designed to link LRT service with both bus service and... gasp... people who drive cars.
15. **Additional element** – High frequency (five minute or better) small bus service (Metro Mobility size vehicles) on the entire Greenway, from the Hiawatha/Lake Street Blue Line Station to Uptown, and continuing West using Lake Street, Excelsior Boulevard and Highway 7. This one-seat ride route will be available for both frequent stop and express service, because the LRT will be in a tunnel from the Uptown Transit Hub to I-35W -- it will surface just West of I-35W, and will be elevated along the I-35W corridor to Downtown Minneapolis. This small bus service will be linked with Lake Street bus service at six major intersections, representing the six stops for the express service. The frequent stop service will stop approximately every full city block (1/8th of a mile), including at all other North-South bus intersections. All bus intersections will include elevator service linking the below-grade Greenway with the surface North-South routes.
16. **Additional element** – As with the Lake Street/Greenway lines, the Nicollet line will be linked with freeway-speed express service on I-35W. Initially, the links will be at the Convention Hub, Lake Street, and 46th Street – this can and should be expanded further South to a frequent-service route that turns West on 66th Street to link with I-35W at 66th Street Station. Because Lyndale and I-35W continue parallel, and are relatively close, and due to significant commercial development out to 98th Street, the Nicollet Link line could take I-35W to 76th Street, then run a loop (in both directions, clockwise & counter-) including Lyndale and I-35W, switching at the 98th Street Bloomington Transit Center. The improved access to jobs along this corridor makes it an Equity issue – an argument could be made for including this as a core element of the Alternative “3C” plan.

17. **Additional element** – A general bus service plan to introduce high frequency service (every five minutes or better) on the Lake Street, Franklin and Nicollet bus routes, and on other North-South routes as soon as this becomes practical. The basic idea is simple: when service frequency is five minutes or less, people are much more willing to transfer, and don't worry about schedules. The result will be a virtuous cycle: better service and higher use.
18. **Additional consideration** – In 2013 I published a book-length presentation of what such a five minute service system might comprise for all of Minneapolis. Presenting this option in greater detail is beyond the scope of this comment, but should be noted.
19. **Additional consideration** – A potential Metro-wide alternative to both Light Rail and “Corridors of Commerce”/BRT systems might be a grid system of high-frequency Freeway bus service provided throughout the I-494/I-694 beltway. Presenting such an option in greater detail is beyond the scope of this comment, but should be noted.
20. **Additional consideration** – We are in the century of automated everything, including automated driving. However, while there's currently a lot of buzz about cars, little attention has been given to the significance for transit. Automated driving will make it possible to provide “last mile” vehicles, greatly expanding the reach of all forms of transit, including LRT routes. This reality is a huge consideration in considering the reasonableness of the so-called “no build” option – which is really more of a choice to wait a little while and “keep our powder dry.”

Part C: Focus on the modified “3C”

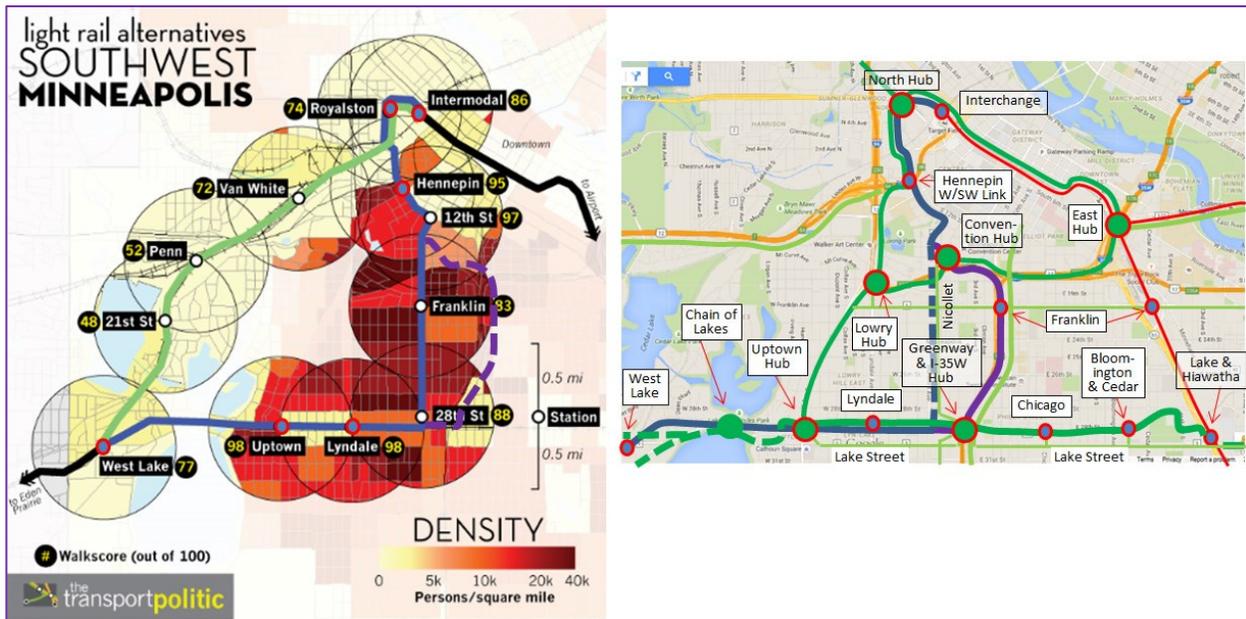
Alignment

The first map (at right) shows the “3C” alignment, but **with my proposed modification to that route shown as a dashed purple line**. Instead of tunneling North-South at Nicollet, the modified alignment would proceed to a Greenway & I-35W Transit Hub, then to a Franklin Station and a new Convention Hub (in effect replacing the “3C” 12th St. Station), before linking again with the “3C” alignment. Although the alternative route is a little



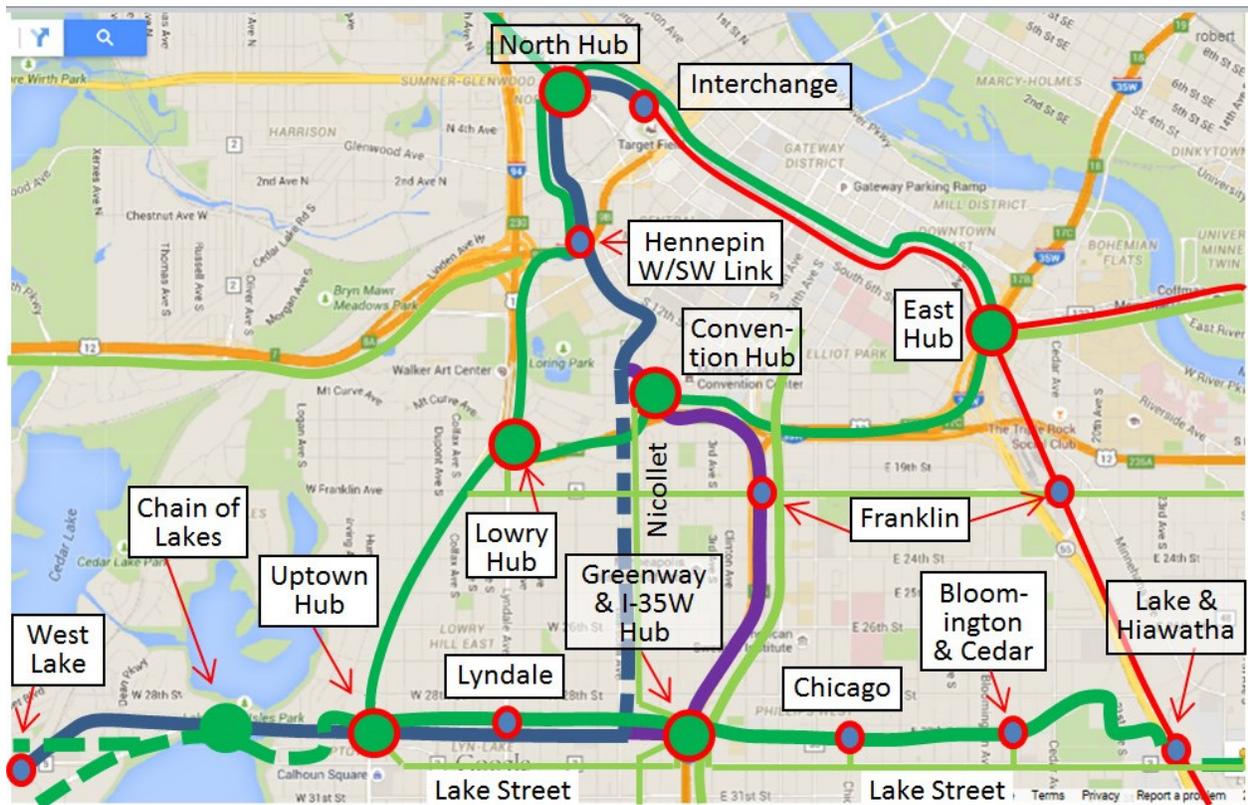
longer, it can probably proceed at higher speed along the freeway corridor – the length of the trip would not be likely to increase by more than a minute (if that) compared to the current “3C” alignment. For the alternative purple section of the route, there is no net change in the number of stations compared to the “3C” alignment.

The next maps (below) show a side-by-side illustration of the first map and a new rendering of the Alternative for “3C”, including several new features that will be detailed. The two side-by-side illustrations are approximately to scale.



Looking ahead to the next page, and to a larger view of the Alternative alignment map, let’s focus on the individual features. The Greenway & I-35W Hub is a major addition, and emphasizes the importance of integrating this LRT line into our overall transit system, which of course includes both established city street routes, and freeways. I-35W is emerging as a major, if not the most important, transit corridor in the entire Twin Cities. It features center MnPass lanes from downtown Minneapolis to Burnsville, ensuring congestion-free bus commuting. Here’s another crucial point: there is already a 46th Street Transit Station connecting to the center MnPass lanes (thank you Mayor Rybak!) Buses pull into this station, and people can transfer from 46th Street to the buses, which then continue in the center MnPass lanes. These buses can and will stop at the Greenway & I-35W Hub, but with a major additional advantage – the freeway BRT routes are now linking to both an LRT line, and to two of the most important and heavily used street bus routes in the Metro Transit system – the Nicollet line (18) and the

Lake Street line (21, there is also a 53 express route on Lake Street). Those buses will go on dedicated ramps to a special hub platform above the LRT platform, which itself will be above the I-35W right of way. Nicollet is about 800 or 900 feet from I-35W – however, Nicollet buses are currently already detouring around the K-Mart site at Nicollet. With new, dedicated ramps optimized for an efficient transfer, there will be either no increase, or a very negligible increase, in the trip length. The Lake Street buses will also move on dedicated ramps optimized for an efficient transfer – their detour is one city block (660 feet). As noted, the LRT will be in a tunnel from just West of the Uptown Hub, surfacing and rising to an elevation above I-35W. This will accommodate another key feature of the entire system – a right of way for high-frequency Metro Mobility size buses running the entire length of the Greenway from a link to the Blue Line on the East, to just beyond the Uptown hub, where they will be routed to Lake Street to continue further West.



The elevators at the Greenway & I-35W Hub will thus have four levels. Level 1 links to the below-grade small bus service, and to bikers and walkers using the Greenway. Level 2 links to buses on I-35W. Level 3 links to the LRT, and level 4 links to the “sky-bi” route above the LRT. Of course the elevation of the

entire structure changes when approaching bridges and other multi-level sections along the freeway corridor.

It certainly makes sense to plan for a park-and-ride facility, which would add at least a level 5. We can and should integrate transit and car use to the fullest extent possible. After all, when people are willing to use their cars for part of a trip, and transit for the rest of the trip, the net effect will be to reduce congestion, but also, to increase the level of population density that is sustainable without transportation congestion. This will have the effect of increasing the economic value of all existing housing stock, and more generally of all real estate.

Regarding the budget, it is appropriate to include at least part, and possibly most or all, of the cost of the Greenway & I-35W Hub as part of the LRT project. One reason is that the LRT route is so closely integrated with the other features that this should be viewed as a “package deal”. But beyond this, the Equity issue is crucial – this Hub will greatly improve the usefulness and value of the entire Transit system for people of color and low income people.

The **Franklin Station** is a simple link between the LRT and users of Franklin Avenue, including transit riders, people driving, bikers, pedestrians, skateboarders... let’s just stop there.

The LRT route then proceeds to a new **Convention Hub**, which will also link with the Nicollet line (18), a number of other city street routes, with other Transit Hubs surrounding downtown, and with express bus commuter and reverse commuter routes coming into and out of downtown. This Hub will also provide small vehicles dispatched at very high frequency (2-3 minutes during rush hour, five minutes other times) to make all points in downtown an easy walk (in most cases 1/8 of a mile or less, never more than a quarter mile).

Because reverse commuting service will be such a big element of the Convention Hub, and because this is an equity issue, for this reason alone, the cost of the Convention Hub should be entirely within the LRT project budget.

The exact location, dimensions, and scope of this Hub are to be determined – it might make sense to build it above the I-94 corridor, including as part of a large, extended open plaza area, or combined Park-and-Plaza area, to the rear of the Convention Center – such an area could be configured as either a park-like setting, or as space for outside exhibits, depending on the specific Convention event.

The overriding idea driving what the Convention Hub should be is to greatly expand the features and attractiveness of Minneapolis as a Convention site, and more specifically, to use Transit to integrate the Convention Center with the Airport, lodging locations, other near-by facilities, including all our Stadiums, Arenas, and Auditoriums, and with academic institutions including the University of Minnesota, the University of Saint Thomas, Augsburg College, and MCTC. Finally, since Minnesota is such an important location for Medical technology, we need to consider how best to link the Mayo Clinic with future Convention and Conference events.

As noted in the summary, if the Bottineau corridor is served by an elevated, congestion-free BRT and frequent stop bus transit, the Blue Line can easily be extended to the Convention Center, and beyond, to at least the Chain of Lakes Station, but possibly all the way out to Shady Oak. If this is done, LRT trains would cross Hennepin at 12th Street an average of every 2.5 minutes – for this reason it will be necessary to either elevate over Hennepin or tunnel underneath Hennepin. However, after accepting this added costs, one advantage of the proposed Alternative LRT alignment is that there is no barrier to having five minute service, or even more frequent service, to at least the Chain of Lakes Station – for this entire distance the LRT route does not cross any other transportation right of way at grade. Of course the advantage of this service frequency is obvious – people simply don't have to worry about schedules -- or about waiting any significant amount of time, when transferring.

Leaving the proposed Transit Hubs circling downtown aside for the moment, an LRT system including a Blue Line extension to at least Uptown (or beyond) will accomplish the goal of linking all the stadium and arena venues, the academic institutions, and the Airport to the Convention Center, as one large if somewhat extended facility. This alone will greatly increase the attractiveness of the Twin Cities as a Convention venue. Beyond that, convention goers will also have quick Transit access to the heart of our amazing Park System – stopping at the Chain of Lakes Station.

At least a brief comment about Chain of Lakes Station is in order. One of the most unique (and best) aspects of the Minneapolis Park System is that it offers almost a total escape from commercialism. On the map, the Chain of Lakes Station is deliberately illustrated as a simple green circle. The Station itself must be devoid of all commercial signage, except for the kind of informational displays the Minneapolis Park Board discretely and artfully supplies – directions about how to rent bikes, boats, and so forth, and a “you are here” map. This is an essential element of our Park experience in Minneapolis.

Of course, convention goers can also get off at the Downtown East Station, where it's a short walk to the equally interesting and historic Milling District.

In short, Minneapolis is a fantastic place to have conventions already – the addition of the LRT line, and LRT service linking all the elements of our “Chain of Conventions” facilities will be a huge step forward.

From the Convention Hub people can of course also go to downtown Saint Paul, with its many attractions, including the Ordway, the Excel Center, and the new Saints Stadium, and to all the amenities and lodging facilities in Saint Paul and along the Green Line route.

And let's not forget the Mall of America, at the end of the Blue Line – this will be an attractive end-of-day destination for many conventioners – not just people who are lodging at or near the MOA, or along that route.

Finally, Mystic Lake will of course want to have high-frequency, non-stop express buses running to and from the Convention Hub – Canterbury Park and ValleyFair will probably want to work cooperatively with Mystic Lake to also offer their amenities.

The Convention Hub will also include a giant park-and-ride ramp – directly accessible from I-35W MnPass lanes. There's no reason why that ramp shouldn't include both “traditional” car rental facilities, and also services like “Hour Car” and Car2Go, both active participants in the Twin Cities transit scene. There will also be a giant “Nice Ride” bike rental facility (note: the number one Segway rental facility in the U.S. is located in the Milling District, accessed from the Downtown East Station).

From the Convention Hub the “3C” Alternative Alignment returns to the proposed “3C” route, and next reaches the **Hennepin Station** at 12th Street. As noted, assuming the Blue Line extension and five minute service, this must be above or below grade. We should note here that this location is a crucial link to many Southwest and West Commuter bus routes, which can and should all serve as reverse commuter routes. This is again a major Equity issue.

I presented an overview of a plan for greatly expanded reverse commuting service in a recent Star Tribune Commentary article: “A solution to affordable housing lies in creative busing”

Here is a link to the article, published 3/15/15:

<http://www.startribune.com/a-solution-to-affordable-housing-lies-in-creative-busing/297300831/>

Here is an extended excerpt (most of the entire article), focusing on the reverse commuting aspect:

Fortunately, there is something we can do immediately to achieve a kind of instant transit-to-work equity. This proposed improvement also will establish needed transit links for future low-income residents of suburban affordable housing.

Here are some relevant facts:

About 40 percent of workers in downtown Minneapolis commute using transit. Every weekday morning, 711 buses roll down Marquette or 2nd avenues, bringing in tens of thousands of suburban express commuters. This does not include Minneapolis day-and-evening city routes.

Those 711 buses are on 104 express routes — most are shiny and new, and many sport free onboard Wi-Fi. All travel partly or mostly on a freeway. The average express route has seven buses coming in each morning.

However, only 90 of those 711 incoming buses are on a reverse-commute route. The other 621 buses often deadhead back for another run.

To be conservative, let's start by assuming that half of the disparity between incoming buses and outgoing buses — about 300 bus runs — could and should be used for more reverse commuting.

But let's not think "routes" — let's think in terms of trips to work. Instead of deadheading, each trip should have its own published, online schedule — for one point-to-point bus run at freeway speed — to one of 300 top employment locations throughout the Twin Cities.

Here's where the instant transit-to-work equity part comes in: Minneapolis neighborhoods with high concentrations of poverty are within a 20-minute morning city street bus run to link up with these proposed trip-to-work buses. All 300 of these job destinations would be accessible.

In the afternoons, we'd just run it all backward.

This transit-to-work system wouldn't be based on income. Anyone near downtown could commute to these major job destinations in the Twin Cities. Your job moves? Different job? No problem.

Many enhancements merit study. Each bus could stop twice (oh, all right, a few times), resulting in two morning and two afternoon runs to the 300 (or more) point-to-point jobs destinations. We

could add a third stop on the Interstate 494-694 beltway — and a beltway loop route — so people could short-circuit the hub-and-spoke system.

The difference between commuter buses and reverse-commute runs is a disparity in transit access to jobs. Of course, we don't want to take away transit from suburban commuters. But, as a matter of justice, we can and should provide transit-to-work equity — the same number of commuting and reverse-commuting trips. For efficiency, some trips could be with Metro Mobility buses, vans or even taxis. (Uber? Humm.)

In this century, we can and should make hub-and-spoke commuting — and transit-to-work equity — a two-way street.

Bob (Again) Carney Jr. is a registered lobbyist for We the People, an informal association.

I have since compiled a spreadsheet, looking at all the commuter express routes (both Metro Transit and the so-called “opt-outs” like Southwest Transit) going into downtown Minneapolis each morning. Of the 700+ buses going in, about 400 have enough time to travel the same route in reverse, with ten minutes to spare, before beginning the final in-bound commuting run.

Very simply, this means we have an opportunity to provide an extensive, revolutionary increase in reverse commuting bus service from Downtown Minneapolis to job locations throughout the Metro area, but more particularly, to the entire job-rich quadrant bounded by I-35W and I-394.

Here's a crucial point, all of the reverse commute routes for this quadrant come in on either I-35W, which will be routed directly to the Convention Hub, or I-394, which already crosses Hennepin at 12th Street – and both of these Freeways have MnPass lanes. Therefore, all of the reverse commuter runs can be routed to freeway entrances at two points: the Convention Hub, and the Hennepin Station at 12th Street. Of course with the proposed Alternative “3C” Alignment, LRT trains from the North Hub will reach both the Hennepin & 12th Street Station and the Convention Hub every five minutes.

We'll turn next to the North Hub (“Royalston” in the “3C” plan) – significantly and necessarily expended in the Alternative Alignment plan. For now, here is the crucial point: the Alternative Alignment is a huge step forward in Transit equity, because it links all the city street bus service on both the North Side, and the near South Side, to what will be a greatly expanded network of reverse commuting runs reaching jobs at freeway speed throughout the Southwest quadrant of the Twin Cities, and more generally, throughout the entire metro area.

As we now consider the **North Hub** in more detail, we'll see why the Equity issue requires it to be fully funded by the current proposed LRT budget.

North Minneapolis and the near South Side of Minneapolis are the two areas of the city with the highest concentrations of poverty; both these areas also have high concentrations of people of color. This is why Transit equity is such an important issue.

Fortunately, North Minneapolis is well served by North-South bus routes, and here's some really good news: with two exceptions, all of these routes – the 9 (Glenwood/Cedar Lake), the 19 (Penn), the 5 (Emerson/Fremont) and the 22 (Lyndale) already *all converge* at or very near the North Hub. The convergence of these routes alone is what makes the location of the North Hub obvious. The remaining two routes – 14 (Broadway) and 7 (Plymouth) -- head into downtown a quarter mile and 3/8 mile from the North Hub. Although this isn't a perfect solution (there isn't one), as with the Nicollet and Lake Street lines, dedicated, elevated bus transit ways can be built and optimized to quickly bring 14 and 7 buses to the North Hub, and then quickly return them to their current routes.

Of course one advantage follows immediately – all LRT riders (all lines) can take any of the North Minneapolis routes from the North Hub. But uniting all the North Minneapolis routes at the North Hub offers several other advantages. One is that there is now 5 minute LRT service to all of the reverse commuter routes reaching the entire Southwest quadrant of the Twin Cities – via the 12th and Hennepin Station and the Convention Hub. Another is that this 5 minute services extends directly and quickly to bus service on Franklin, Lake Street, and to Uptown, including all the I-35W, Nicollet and Lyndale North-South routes, and all the routes heading South and West from Uptown.

This leads to a further point – the current plan includes as a core element high frequency service (five minutes or better) on West Broadway, linking all North-South bus routes on the North side, and also linking to high frequency service (five minute service or better) providing a direct, one-stop freeway link from Broadway and I-94 to the Greenway & I-35W Hub – and that one stop is at the 12th & Hennepin Station. This provides even faster service for North side commuters to all of the commuting opportunities offered by the proposed Alternative version of the “3C” alignment – including all reverse commuter service in the Southwest quadrant.

The North Hub will also include a large park-and-ride facility – to accommodate people who are better served if they can drive part of the trip, and then use one or more of the Transit services available from the North Hub. As with people driving to the large ramps at the downtown end of I-394, car pooling

should be encouraged. This additional parking, with access that can be managed to bring people in who are not driving through downtown, will also serve sports events at Target Field, the Target Center, and Vikings games, and of course will bring in revenue doing so. As with other Hubs, there will be high frequency small vehicles bring people to a 1/8 mile walk from most downtown destinations – never more than a quarter mile. This service will be coordinated with the LRT and bus routes converging at the North Hub, which already are reaching many areas of downtown.

In short, the proposed Alternative “3C” alignment, when combined with a North Hub, is such a major advance in Transit Equity that based on this issue alone it’s full cost must be included in the proposed LRT budget.

But even considering only the impact on residents of North Minneapolis, the Equity issue really extends further. The overall increase in Transit Equity resulting from this Alternative version of the “3C” alignment is so great that it must be weighed carefully when considering any Federal funding formula that fails to provide Federal money for such a plan. Very simply, a Federal formula that fails to give due weight to the Equity advantages of a plan such as this plan is probably grounds for a lawsuit challenging the formula as itself fundamentally unjust.

Let’s turn now to South Minneapolis, with a focus on the near South side – and giving special attention to the area East of I-35W.

Looking forward, it is essential to put LRT in a tunnel from just West of Uptown to when it surfaces at I-35W – even if high-frequency (five minute or better) “one seat ride” Metro Mobility don’t immediately run the full length of the Greenway, we need to be sure this service is possible as part of the plan.

More immediately, even without that service on the Greenway East of I-35W, the Lake Street bus service is now linked with the Greenway & I-35W Hub. The weekday rush hour travel time from the Blue Line Lake Street Station to the Greenway & I-35W Station will be about 15 minutes – from Uptown to I-35W it’s about 12 minutes. On Franklin, the times from the Hennepin and Blue Line ends to the I-35W Station will be a little less. Very simply, this means that with fast and five minute service from the Greenway & I-35W Hub to both the Convention Hub and the 12th and Hennepin Station, the proposed Alternative “3C” Alignment will provide excellent access to all the reverse commute routes in the Southwest quadrant, and more generally throughout the Metro area. Again, this is a crucial, compelling, Equity issue – the proposed plan does much more for Transit Equity than the current, so-called “Locally Preferred Alternative” running through Kenilworth.

Now, let's add in "Additional Element 15" from our list – this is NOT included in the current plan or budget, but it is enabled by the proposed plan and budget. Very simply, the plan is to grade, pave, and use the Greenway, from the Blue Line West, continuing along Lake Street after Uptown, with spurs along Excelsior Boulevard, Highway 7, and Lake Street. There will be both high frequency (five minute or better) express service, and high frequency (five minute or better) frequent stop service. In addition, special one-block ramps, optimized for fast transfers, will be built for two of the express stops: at Chicago and Bloomington-Cedar – as with the Greenway & I-35W Hub, Lake Street buses will link with the Greenway stops at these intersections. Lyndale will probably not have such a ramp, but the Westbound Lake Street buses may simply be routed to the Greenway, proceeding on 29th Street instead of Lake Street to the Uptown Transit Station (all the busses already go North half a block to Lagoon at Dupont). Regarding Bloomington and Cedar – these two North-South routes are five blocks apart – it makes sense to also include special ramps meeting at a central transfer point above the Greenway. Because these routes are so close, meeting there will add only a minute or two to the trip time, but will offer significant advantages – easy transfers between the two routes, and a common stop on the Greenway, promoting faster express service.

One major advantage offered by this system is the high frequency (five minutes or better) fast, "one-seat", guaranteed congestion-free express service along the entire Greenway. Very simply, with this system it will be *faster* to use transit rather than a car to traverse significant East-West distances. The links with Lake Street are frequent enough so that people can, in a reasonable amount of time, get from any address along Lake Street or the Greenway, to any other address along Lake Street or the Greenway. Because this high-frequency one-seat service will extend both East (towards/to Saint Paul) and West (towards/to Hopkins/Eden Prairie/Minnetonka) and will reach all points on both Excelsior Boulevard and Highway 7 (the parallel routes nearest the LRT), the overall East/West Transit service will be incredibly good. Of course, one predictable result from this system will be a solid row of large apartment complexes along the entire length of the Greenway – that feature is already largely complete between Hennepin and Lyndale

And again, returning to our crucial point about Equity – this level of service will be of the greatest benefit to people living in the middle – in the near South Side neighborhoods with high concentrations of poverty and of people of color.

With this additional element factored in, the Equity case for the proposed Alternative "3C" Alignment, when combined with this supplemental feature, is simply overwhelming.

Two additional Hubs: Lowry and East, comprise the system of Hubs encircling downtown Minneapolis. Both of these are not directly associated with the Southwest LRT project, and thus do not merit inclusion in the budget. However, because the encircling system of downtown Hubs will promote more transit use to and from downtown, and because the system supports enhanced and all-season biking, which is also closely integrated with Transit, these aspects merits further comment.

The Lowry Hub is important as a connecting point for I-394 to I-35W and I-94, for multiple city street bus connections (routes 2, 4, 6, 12 and 25), and for its ability to relieve a lot of congestion by providing a park-and-ride facility for all the neighborhoods South and West of Hennepin and Franklin. Because the Lowry Hub can be quickly reached from the North Hub, it provides fast bus commuting access to these many city street routes. An elevated Transit way, also open to MnPass drivers, should be considered from Hennepin directly to the Lowry Hub – this can both produce revenue and relieve congestion by also bringing in cars from South of Lake Street and West of Hennepin – including of course, reverse commuters and car poolers. Restrictions on car use on Hennepin during rush hours should also be considered, as another way to relieve congestion and facilitate faster service for the 6, 12 and 17 routes (17 turns East at 24th Street). Finally, because a “sky-bi” can be included above an elevated Transit way, this will significantly increase all-season bike commuting and riding – the Uptown area already has a high concentration of bike commuters and riders, with excellent bike connections to downtown, including the Bryant bike boulevard.

The East Hub is also important as a connecting point for freeways: I-35W, I-94, and I-394 all reach the Hub. Because this is the point where the two LRT lines diverge, all the freeways can be linked here to both lines. The 7 and 22 lines – both North-South routes in South Minneapolis, head directly to the East Hub, as does the 94 express service to Saint Paul, and the 3 route, a high frequency route that also runs to downtown Saint Paul. However, to best coordinate and integrate North-South service for South Minneapolis, a dedicated, elevated Transit way must extend to as far as 9th Street and Portland Avenue – this will link in the 5, 9 and 14 routes, all providing North-South service. The result is that all the downtown to South Minneapolis North-South lines from Chicago to the Mississippi River will be integrated and coordinated at the East Hub – that justifies the slightly longer trip times for the 5, 9 and 14 routes. Note that all reverse commuter routes that don’t go through either 12th and Hennepin or the Convention Hub will go through the East Hub or the North Hub. As with the other Hubs, there will be a giant park-and-ride ramp above this Hub, making major elements of the entire Transit system accessible to people who are driving to Minneapolis from all points East and Northeast. This ramp will also serve

Downtown East, and will provide added parking for sporting and other events, again producing more revenue in the process.

We have already noted that all reverse commuter routes will pass through either one of the Hubs, or will be reached by the 12th Street and Hennepin station, which is also looped in to the Hub system with an elevated Transit way. However, several city street routes remain unaccounted for. To complete this part of the puzzle, Routes 10, 11 and 17, all providing North-South service to NorthEast Minneapolis, will all reach and be linked in to the Convention Hub. Route 61, serving near NorthEast Minneapolis before heading to Saint Paul, will be linked in to the North Hub.

An encircling system of dedicated, elevated Transit ways directly connects the three downtown Hubs (Lowry is a separate case) and the 12th and Hennepin link to both LRT lines and to South and West reverse commute busses. The overall result is that all city street routes, all commuter routes, and all reverse commuter routes reaching downtown can be accessed at one or more of these Hubs. Because shuttle bus service connecting the hubs is both direct and very frequent (2-3 minute service during rush hours, never less frequent than five minutes except owl hours), the result is quick and easy connections among all the city street, commuter, and reverse commuter routes. People can also access this entire system using the giant park-and-ride ramps, gaining all the benefits of the entire Transit system without ever entering downtown in their cars. And all the Hubs provide very high frequency (2-3 minutes during rush hours) small vehicle connections to the entire downtown area, typically with a walk of an eighth of a mile or less, never more than a quarter mile.

Finally, let's keep in mind that this perimeter of elevated Transit ways is the backbone of a system of "sky-bi" routes providing all-weather, year round bike access to and within downtown. As an inner grid of "sky-bi" routes is built, and with Nice Ride bikes available everywhere in the system, all kinds of trips within and near downtown – anywhere from a few blocks to a couple of miles – can be completed by bike. Of course this includes courier and food delivery services.

The effect of bike commuting, and of bike use in general, on reducing congestion in Minneapolis is already significant – and will only grow in years to come. The key to accelerating this growth is to establish an all season, all weather core of routes, and to tightly link bike use with Transit – we're already doing both of these things.

Let's next briefly consider one of the greatest barriers to the ability of people, and households, to reduce or eliminate the need for owning and using cars: shopping.

Simply put, it is typically very inconvenient to shop using Transit. However, the roll-on-roll-off design of LRT cars, and the large number of square feet available on each train, has the potential to radically change this. The missing element is a system of shopping buses and routes. These can be added, and scheduled intermittently – for example, several hours a day one or two days a week can be designated as “shopping bus times” for various specific routes that link with LRT. During these times, connections to several major shopping venues can be provided, along with specially configured buses that provide the same roll-on-roll-off capability for full size shopping carts that LRT already provides. These could be Metro Mobility buses designed with the ability to quickly switch out multiple interior configurations. The point is simply to allow people to roll their own full-size shopping cart to and from their home and a wide variety of shopping destinations. The carts can be designed with larger tires, to accommodate winter. They can be power-assisted – they can even allow people to stand on a platform at the “push” end and drive them.

The Eden Prairie Center and surrounding shopping venues are currently accessible only by car – they’re simply too spread out. However, the Alternative “3C” Alignment, supplemented by Shopping Bus service, can completely change this situation.

Let’s start by assuming direct high frequency (five minutes or less) bus service from the Hopkins end of the LRT line to **Prairie Central Station**, using buses configured for roll-on-roll-off shopping carts.

The map at the right shows **Prairie Central Station**, which supports two shopping routes, a third route for travelers who want to avoid renting a car, and a fourth route shuttling back and forth between Flying Cloud Airport (this can be expanded to an MSP shuttle loop). The shopping routes are designed to make a range of general retail and home-oriented shopping



venues available to people **who don't or can't drive**. As noted, if you don't drive, this group of retailers tends to be too spread out to make bus shopping practical. We can and should do *at least as much* for people who shop using transit as we do for people who combine biking with transit. This is yet another fundamental transit Equity issue. A major increase in Transit ridership, using the proposed Alternative "3C" Alignment – for shopping – by people in all income groups, throughout the transit areas linked by LRT, should be an expected result from implementing this plan.

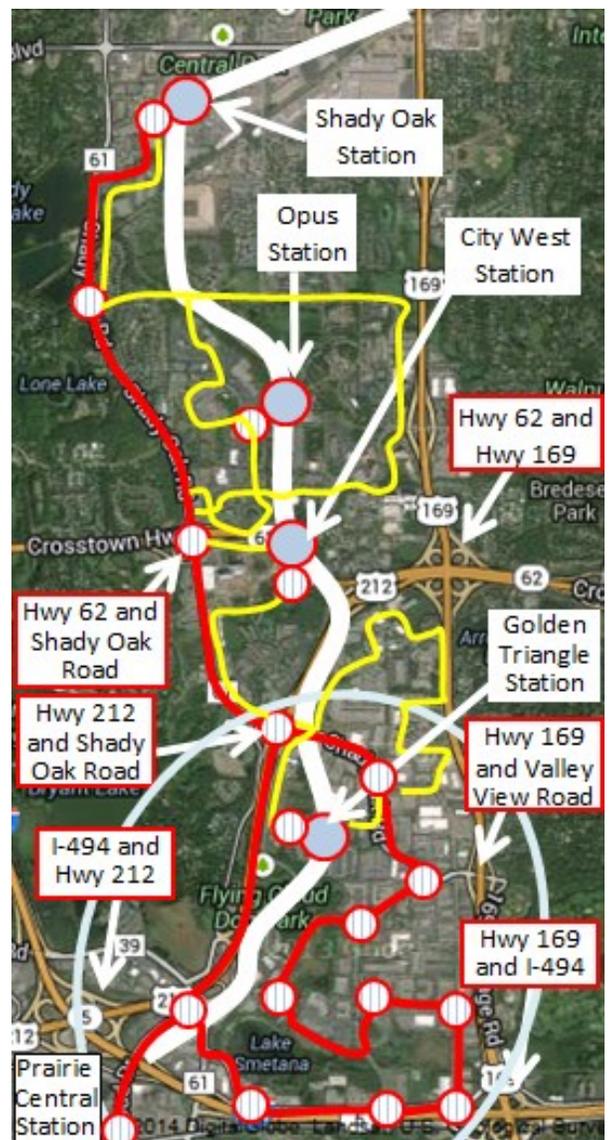
Notice how many of these venues (Home Depot, Costco, Menards come immediately to mind) typically are not conveniently accessible to people living in urban cores who don't drive. This plan ends that disparity – yet another powerful argument that the overall Equity provided is an impelling reason for Federal funding – with a modified formula if necessary – achieved by a lawsuit if necessary.

We should note that there are also seven major lodging establishments in a concentrated area near **Prairie Central Station**. Better shopping options will make longer stays for business employees and contractors more economical. Let's figure out a way to pass the savings from not needing a car to the **people** who won't need them. That should be a fringe benefit for contractors and people on extended business trips.

From Shady Oak Station to Eden Prairie Center – and Southwest Station.

Let's assume that the Alternative "3C" Alignment ends at Shady Oak Station rather than Hopkins Station.

First, a high frequency (five minute or better) direct run should be provided from Shady Oak Station to Southwest Station. This will accommodate many people, including some who car-share to Southwest Station, and U of M students and employees, with a link to the LRT line, and therefore to all the Transit options it provides. Many people may want to take the Southwest Transit commuter



bus to downtown in the morning, but have all Transit options available to them before they return to their car at Southwest Station later in the day or evening. These people can and should be accommodated – but *without* the enormous expense of running an LRT line through the Golden Triangle.

For the map on the previous page, the currently proposed LRT Alignment (the one that runs through Kenilworth), with four stations, is shown with the thick white line. Shady Oak Road is in red – the red West side of the loop at the bottom is Hwy 212. It's about three miles from Shady Oak Station to Golden Triangle Station, and about another mile and a half to my proposed new **Prairie Central Station**, in the middle of Eden Prairie Center. When you consider these distances, here's the reality that emerges: the proposed Light Rail stations are *not* walking distance apart. However, when you're in a vehicle, a mile is nothing. Therefore, we need to add some additional ingredients to the mix. First, since we're replacing the proposed Southwest Light Rail right of way with Shady Oak Road, we'll add a **Golden Triangle Loop** – circled in light blue -- running South of the Shady Oak/212 intersection, with **Five Minute Service** frequency, and closer stops. A spur runs to **Prairie Central Station**. The **Golden Triangle Loop** brings about 20,000 jobs within *real* walking distance of a Transit stop. The meandering Northern **Shady Oak Loop** is another yellow brick road --highlighted with a yellow line -- and also with **Five Minute Service** frequency -- connecting the Shady Oak/Hwy 212 stop on the South with Shady Oak Station on the North. The longer path, with on-demand stops along the way, is necessary to reach all major buildings, including Super Value Headquarters and a new United Healthcare facility with 6,000 jobs, and to accommodate one way streets in Minnetonka. There are three intermediate stops, including Hwy 62.

Next, let's consider the "last mile" challenge for Hopkins, Saint Louis Park, and the Golden Triangle – and a simple solution: subsidized Car2Go service for those areas. Car2Go is already operating in Minneapolis and Saint Paul. The cost is about \$.50 a minute, typically with about a \$1 per trip surcharge. Users can reserve a Car2Go for half an hour (there will always be enough at LRT stops to make that part unnecessary), then drive to their destination, get out, and just leave the vehicle. It can be put "on hold" at a charge – or people can simply take a chance – it might be there when they're ready to go back, or it might not – if it isn't, just look at the on-line map half an hour before the return trip, pick the nearest Car2Go, reserve it, and go back to the nearest LRT station – or somewhere else.

Because Car2Go already has their infrastructure operating in the Twin Cities, they are a logical candidate for a contract providing for subsidized service for qualified Transit riders. Admittedly, there is an Equity issue here – some Transit riders, due to bad driving records and/or other reasons, may not be accepted as Car2Go customers. It seems clear that Car2Go must be given the option, using objective criteria, to

decline to accept some customers. If this issue doesn't emerge as a "show-stopper" obstacle, the next step is to work out a contract with Car2Go that will provide an effective "last mile" solution to people using LRT to travel (probably to a business or store) in Hopkins or Saint Louis Park – or to reach a site in the Golden Triangle. Of course, Car2Go users can also end their trip anywhere in Minneapolis where Car2Go drop offs are allowed (only a few areas, such as parts of Uptown, are excluded as drop-off areas). Assuming that this feature makes the overall "Transit deal" attractive for many people who otherwise wouldn't use it, the subsidy is justified for that reason alone – over time, these people are likely to increase their Transit use. Many people living in Southwest Minneapolis would probably find this an attractive option – even if one they use only occasionally. They can complete a trip by driving directly to their house, and then just leaving the car outside.

Our final element for consideration is adding two Hubs, linking the LRT line with Highway 169, and with Highway 7 and Highway 100. The basic idea of the Greenway & I-35W Hub applies, buses go directly from the freeways to the hub, people get on and off, and a park-and-ride facility is provided. Due to cost, this element of the plan may be delayed, but planning should ensure it can be added later in an optimal way.

Two final and concluding points: First, I suggested at the beginning that studying a transit "corridor", rather than considering an entire Transit and transportation system, is almost a fatal flaw to this entire process. Without going further, I simply want to reemphasize that throughout this presentation I have tried to emphasize the system elements.

Second, at the beginning I suggested "no built" must also be considered as an option.

For more elaboration on this point, below is the title and text of another of my op-ed articles, published by the Star Tribune 2/18/14:

TITLE: For Transit, smaller vehicles and lots more trips

In recent weeks, transit has been a recurring topic on this page. An editorial documented a woeful future that threatens, due to worn out roads and bridges ("State's in a jam on transportation funds," Jan. 11). A commentary article followed, from Republican legislators, indicting the economics of streetcars ("Why the Legislature should put brakes on streetcar dreams," Jan. 18). Minneapolis officials responded with a challenge ("Streetcars, yes, and buses

and more,” Jan. 29), saying the lawmakers should offer up “... a BRT-only, no-rail transit system. Then we could have a real debate.”

A “real debate” is welcome. But let’s expand our scope to a comprehensive vision of what we can truly do with transit. Let’s think and plan using our knowledge of current and emerging technology. Let’s plan on the scale — with the 100-year time frame and public-private coordination — that founded our Minneapolis park system.

And let’s start with a Southwest light-rail alternative — shaped by three future-focused considerations: vehicle size, service frequency and automated driving.

My proposed “Transit Revolution” approach uses Metro Mobility-size vehicles — 24 passengers and one lift. These cost about \$70,000 new, compared with \$3 million per light-rail car. I’ve run the numbers for a plan that would move the same number of people on the Southwest Corridor as light rail.

The light-rail plan features about 200 weekday trips, with about 100 people on each train. The Transit Revolution alternative averages about 10 people a trip, with about 2,400 trips a day.

Here’s your obvious thought: “Bob, you’re crazy! Economies of scale — it’s a slam dunk — light rail is the way to go!”

Well, let me sit you down for a shocking fact: I ran the numbers for part-time drivers (we’ll need almost 700) at \$17 per hour. Even with about 10 times as many discrete daily trips, the \$35 million annual operating cost is about the same as the Met Council’s \$32.7 million light-rail operating cost estimate.

Let’s now consider the advantages of having 10 times as many discrete trips. The service frequency could be much higher — every five minutes or better — even including variants and supplements built into the route. We could tailor express runs for speed, with specialty runs and door-to-door shuttles to bring people to a much finer grid of destinations. Over decades, we could tailor a small-vehicle system for both speed and access in ways that those behemoth light-rail whales can’t possibly match.

In the short term (decades), what I’m proposing is a giant jobs program — and today this is desperately needed. But automated driving is coming. When that happens — when drivers are

the equivalent of elevator operators — the cost per driver (\$0) will become the same for a Metro Mobility-size bus and light rail. Which system do we want our children and grandchildren to have when the switch over begins? That's the decision we're making today.

Next, let's consider capital costs.

Here's the key formula: "existing" equals "zero capital cost."

Transit Revolution vehicles could use the existing Shady Oak Road to roll through the Golden Triangle to Eden Prairie Center.

From Shady Oak Road to downtown our slogan is: "Grade it ... Pave it ... Use it." We could use the existing right of way proposed for the Southwest line from Shady Oak Road to west of Lake Calhoun. But from there, let's go down the existing Midtown Greenway — under three at-grade cross streets just east of Calhoun — with stops at the existing Uptown Station and Lyndale and Nicollet Avenues — all linked by elevator to existing north-south bus routes.

Our Transit Revolution vehicles could go up a ramp at a new Greenway/Lake Street transit station on Interstate 35W, and roll to and from downtown using existing MnPass lanes that are guaranteed congestion-free.

Let's demand a Transit Revolution. Let's build for future generations, instead of rebuilding the past.

Let me suggest that a very significant amount of the overall benefit I've been presenting for the Alternative "3C" alignment can be achieved without LRT – simply by putting high-frequency small buses in the corridor – and please note – the plan already connects the Convention Hub, the North Hub and the Hennepin and 12th Station using elevated bus Transit ways. As you can see, the nub of this approach was outlined in the February 2014 article above. No further elaboration of the "no build" option will be provided in this public comment – beyond noting that a modified and entirely bus-based version of the proposed plan can be developed and studied as an additional reasonable alternative. But I do want to emphasize one additional point made in the article: in the short run (decades) my entire approach is deliberately designed to be a giant jobs program. A radical expansion of Transit service, using thousands of smaller, Metro Mobility size vehicles – and even integrating service with existing taxi fleets, can be and should be the WPA for our time. Our society currently has a desperate need to produce more jobs for people. The approach to Transit I am advocating for will do that directly, by providing thousands of

new jobs for drivers – with the explicit understanding that many if not all of these jobs will be less than full time, that new employees will be coming in at a lower pay scale than the current union drivers, (an approach taken by many large unions with other employers), and with the further explicit understanding that when (not if, when) automated driving becomes a reality, these jobs will be phased out.

To conclude and wrap up: the current plan should be rejected. Per the original Draft Environmental Impact Statement, co-location alone makes it an unacceptable alternative. When you factor in the subsequent enormous cost increases, and now the slashed-back character of the current plan – which would require hundreds of millions of future dollars (with no Federal match) to get it into decent shape – the time is long since past to stop suppressing reasonable alternatives, and to send this back to the drawing board, and to the scoping process.

From: [Becca Vargo Daggett](#)
To: [Anne Mavity](#)
Cc: [swlrt](#)
Subject: SWLRT
Date: Tuesday, July 21, 2015 3:38:43 AM

Dear Councilor Mavity,

I have been reading recent emails and Next Door commentary on the question of replacing the wye in Elmwood with a new bridge to accommodate both light and freight rail, or just putting in a bridge for the LRT.

In light of the cost concerns, I am stunned that the project potentially includes a bridge that will benefit private companies at the public's expense (both in terms of the cost of replacing the wye and the additional traffic it would allow).

I encourage the Council to support a less expensive LRT bridge over the existing wye. If freight rail is included in the bridge, at public expense, the rail companies should be required to compensate the community in proportion to their gains from easier traffic flow.

Thank you for your time,
Becca Vargo Daggett
4205 Brunswick Avenue South
612.913.1331

Sent from my iPhone

From: [George Puzak](#)
To: [swlrt](#)
Cc: [Duininck, Adam](#); [Cunningham, Gary](#); [Dorfman, Gail](#); [Elkins, Steve](#)
Subject: SWLRT--Comments on SDEIS
Date: Tuesday, July 21, 2015 11:45:48 AM
Attachments: [Comments on SWLRT SDEIS July 21 2015.pdf](#)

Dear Ms. Jacobson and SWLRT Project Office staff,

Please accept these comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for SWLRT.

The SDEIS does not adequately address alternatives for SWLRT, nor does it adequately address the impacts of freight rail in the Kenilworth Corridor. The SDEIS cannot fix this project's fundamental flaw—**Hennepin County's failure to include freight rail in the project's original "scoping process."** Hennepin County explicitly omitted freight rail from the project when it selected the SWLRT alignment in 2009, yet added freight rail to the project in 2011. The flaw is that when Hennepin County added freight rail (a new mode) after selecting the route, it failed to re-open scoping and re-examine all alternatives and alignments. The new mode fundamentally changed all aspects of the project.

Required by the National Environmental Policy Act (NEPA), scoping is the first step in environmental review. It identifies the issues, alternatives, locations, and modes of transport to be studied in a transit project's environmental impact statement (EIS). But Hennepin County, in both its 2009 Scoping Report and 2010 Locally Preferred Alternative (LPA), failed to include freight rail as part of SWLRT. Five cities then proceeded to vote and approve the 2010 LPA. In 2011, despite receiving notice from the Federal Transit Administration (FTA) that freight rail is part of SWLRT, Hennepin County failed to amend the scoping report and re-open scoping for public comment, and thus violated NEPA.

Compounding the problem, in summer 2014, the Met Council imposed yet another, fundamentally different plan to be approved, this time through municipal consent: while the 2010 LPA approved by five cities had omitted freight rail in Minneapolis' Kenilworth corridor, the 2014 plan included it. Yet, the Met Council provided no Draft EIS on freight rail, LRT tunnels, and soil conditions before the vote. Citizens lacked critical information and officials from Minneapolis and four other cities were forced to vote on municipal consent.

The current plan would run electric-sparking LRT trains as close as 15 feet from freight trains (carrying as many as 100 cars of ethanol — an explosive whose flash point is below that of oil) through residential neighborhoods, over the Chain of Lakes Kenilworth Channel, and through downtown next to Target Field. *But this arrangement was never included in the original scoping phase. This omission limited the choice of transit options*

and alignments that citizens and decision makers considered. Further, neither citizens nor public officials had information about the 2014 plan's environmental and public safety risks before the vote. Thus, the cities gave blind consent, not informed consent. The government's own errors in following legally-required processes have now caused a conflict—the 2014 municipal consent plan includes freight rail, but the 2010 Locally Preferred Alternative (LPA) does not. The Met Council must update the LPA—triggering a new round of public hearings and municipal votes. The government's own studies also contradict the current plan. According to the December 2012 DEIS, co-location of freight rail and light rail in Kenilworth would not adequately preserve the environment and quality of life in the surrounding area. What has changed since 2012?

Contrary to law, the Met Council has limited the choice of reasonable alternatives and alignments. Reducing costs, studying freight rail in the Supplemental DEIS, and repeating municipal consent are not sufficient remedies. There are only two remedies:

1. Eliminate co-location of freight and LRT by re-locating freight rail out Kenilworth and build the plan approved in 2010; or
2. Re-open and include freight rail in SWLRT's original scoping process. This remedy will allow government and citizens to study all reasonable alternatives for LRT alignments, while acknowledging freight rail's routing, costs, and impacts.

Thank you for your consideration.

George Puzak

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Minneapolis, MN 55403

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greenparks@comcast.net

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July 21, 2015

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
via email: swlrt@metrotransit.org

Dear Ms. Jacobson and SWLRT Project Office staff,

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2. Re-open and include freight rail in SWLRT's original scoping process. This remedy will allow government and citizens to study all reasonable alternatives for LRT alignments, while acknowledging freight rail's routing, costs, and impacts.

Thank you for your consideration.



George Puzak

From: [Terri J. Smith](#)
To: [swlrt](#)
Cc: [craig@redstonegrill.com](#); [thomas.goodrum@westwoodps.com](#); [vern.swing@westwoodps.com](#); [Patrick B. Steinhoff](#); [Bruce D. Malkerson](#)
Subject: Comments on the Southwest Transitway
Date: Tuesday, July 21, 2015 12:38:59 PM
Attachments: [Idlewild Properties and Redstone American Grill Comment Letter on Southwest Transitway \(178317x9C65D\).pdf](#)

Ms. Jacobson:

Please see the attached letter from Idlewild Properties, LLC and Redstone American Grill, Inc. regarding the above-referenced matter.

Terri Smith
Legal Administrative Assistant to Bruce D. Malkerson and Patrick B. Steinhoff
MALKERSON GUNN MARTIN LLP
220 South Sixth Street, Suite 1900
Minneapolis, MN 55402
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REDSTONE™

AMERICAN GRILL

July 21, 2015

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

RE: Comments on the Southwest Transitway
Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Ms. Jacobson and other Interested Parties:

We write on behalf of Idlewild Properties, LLC and Redstone American Grill, Inc. (together, “Redstone”)¹ to comment on the Supplemental Draft Environmental Impact Statement (“SDEIS”) for the SWLRT project.

Redstone owns and operates the Redstone restaurant located at 8000 Eden Road, Eden Prairie. This property is located in the Eden Prairie Segment of the SDEIS and has been identified as a property that will be partially taken for the SWLRT project. Redstone has completed a review of the SDEIS document, and it opposes the recommendation stated in the SDEIS to move the location of the SWLRT rail line to Eden Road. The proposed location recommended by the SDEIS will result in substantial adverse impacts on Redstone’s ability to operate its restaurant. These substantial adverse impacts include, but are not limited to, the loss of parking, access restrictions, increased noise, visual impacts, safety concerns, and the creation of obstacles to the public enjoyment of existing natural amenities (e.g, Lake Idlewild) in the immediate vicinity of the Redstone property.

Redstone offers the following specific comments concerning the SDEIS:

Chapter 2: ALTERNATIVE CONSIDERED:

All of the rail alignments recommended in the DEIS showed the SWLRT line located along Technology Drive. This reasonably demonstrates that the route best suited for the SWLRT is along Technology Drive. We understand the SDEIS was authorized with the intent of reviewing this alignment based on requests by the City of Eden Prairie and certain businesses impacted by the proposed Technology Drive route. However, Technology Drive is the best alignment for the efficient operation of SWLRT as originally concluded.

¹ Idlewild Properties, LLC owns the real property located at 8000 Eden Road, Eden Prairie. Redstone American Grill, Inc. leases that real property and operates the Redstone American Grill restaurant located at the site.



Section 2.3.1 of the SDEIS states that the City of Eden Prairie asked the Metropolitan Council to investigate the feasibility of a more centrally located and walkable Eden Prairie Town Center Station that would provide better opportunities for transit-oriented development and redevelopment. The City prefers a station within walking distance of the Eden Prairie Center (a regional shopping mall) which the City believes will promote its long term economic development goals and provide higher ridership due to the station's proximity to existing and future commercial activity centers. These points are driven solely by the expected economic benefit to the City, not by any improvement in the operation of the SWLRT. As identified throughout this review, moving the route from Technology Drive to Eden Road:

- impacts more businesses
- impacts more roads and intersections
- requires the construction of a new road
- requires crossing more intersections
- creates more safety risks
- does not achieve the walkability to the mall that the city desired (1/4 mile to a mall entrance)

The proposed Town Center Station does not correspond to the three proposed station locations (described in the document attached hereto as Exhibit A), that the City had considered during the DEIS process. The closest recommended station location is near the intersection of Eden Road and Singletree Lane. (See attached maps and city location criteria) The desire to have the station more centrally located within the City's Town Center District is referenced in three city documents:

- Comprehensive Guide Plan, Future Land Use Plan (2009)
- Eden Prairie Town Center Design Guidelines (2007)
- Eden Prairie Major Center Area Study (2006)

Through the 4-step evaluation process conducted for the SDEIS selection of alternative alignments, there are two alignments along Singletree Lane compared to a single alignment along Eden Road. The final step of the evaluation identified two finalist routes for this section of the line:

- Option 1 is the proposed route (comprehensive plan)
- Option 3 is the Singletree Lane route

Both routes are very comparable in their listed advantages to the LRT system. However, it is noted the Singletree Lane route (Option 3) received a Very Good rating for walkability to the Eden Prairie Mall while Option 1 only received a Good (Table F.3.7 from Appendix F). This noted because it reflects a key criteria from the City of Eden Prairie in its request to move the line away from the DEIS recommended route along Technology Drive.

In light of the new announcement that the SWLRT alignment is being amended due to budget constraints and that the Town Center Station is being deferred for cost savings, we demand a new review of the SDEIS alignment be conducted to re-evaluate if the Technology Drive or the Singletree Lane alignment and the proposed Town Center Station are better suited elsewhere to stay on budget for the project.

Chapter 3: AFFECTED ENVIRONMENT, IMPACTS and MITIGATION

Section 3.1.2.1 (Land Use) of the SDEIS states that there is no significant change in land use from the DEIS alignment and the SDEIS alignment. The SDEIS review evaluates which alignment can support higher density or mixed use development. There are no specific federal regulations guiding land use, so the SDEIS relies on local zoning and comprehensive plans to guide their assessments.

There is a significant difference in existing land uses between the Technology Drive alignment and the City's Comprehensive Plan alignment. Although the guiding and zoning of the lands are similar, the actual existing land uses and impacted properties are significantly different. The proposed alignment will impact at least six more businesses than would be impacted on the Technology Drive route. Moreover, the large vacant land areas and under-used land within the larger developed lots along Technology Drive can support future redevelopment better than the smaller parcels along Eden Road. For these reasons as well as the additional reasons identified above, we demand that the Project Office re-evaluate the potential redevelopment of this area in relation to a Town Center Station that will be built (if at all) several years in the future. During that time, the City can plan and construct improvements that will make a station along Technology Drive a viable destination for people to live, work, and play. A road connecting Singletree Lane to Technology Drive and a Town Center Park on the existing Emerson property are currently being considered. These planned projects can be catalysts in supporting a station on Technology Drive.

Section 3.1.2.4 (Parklands, Recreation Areas, and Open Spaces) of the SDEIS notes that land within 350 feet of the proposed SWLRT rail line was considered for potential impacts and that no parks, recreational areas or open spaces exist along this segment of the SWLRT line. The SDEIS therefore concludes that there are no long-term impacts. The SDEIS is simply incorrect on this point, and a new evaluation must therefore be undertaken. The new evaluation must include Lake Idlewild, which is well within the 350 feet limit identified in the SDEIS and, in fact, is only 150 feet from the proposed SWLRT rail line at the east side of the Redstone property. The SDEIS evaluation failed to consider any impacts at all, either, direct, indirect, long-term or short-term to Lake Idlewild. The City of Eden Prairie's 2013 trail map shows the trail around Lake Idlewild as a public trail, and the City's 2007 Comprehensive Plan identifies a future Town Center Park on the vacant land eastern edge of the land owned by Emerson Process Management Educational Services adjacent to Lake Idlewild. These impacts should and must be

considered. It is obvious the noise and scenic disruption caused by the SWLRT will have a long-term impact on these existing and future recreational areas.

We demand that this existing trail and future park be incorporated into the SDEIS document and be given the same consideration provided to Purgatory Park by the SDEIS. In section 3.2.1.4 of the SDEIS, there is a great amount of detail concerning how the SWLRT line will impact Purgatory Park. The SDEIS lists several ways Purgatory Park would be indirectly impacted by the SWLRT including impacts to access into the park, amenities that would require relocation to avoid the rail line, and the visual intrusions that would be experienced by park users as a result of the proposed rail structures. These changes in the Purgatory Par setting would disrupt a visitor's visual experience, resulting in a moderately-low to low impact upon views into and from the park. A solution to avoiding the existing trail and the future park will be to move the proposed rail line to the other finalist alignment along Singletree Lane (Option 3).

Chapter 3.2 EDEN PRAIRIE SEGMENT

This section provides a summary of the potential environmental impacts within the area between Mitchell Road and Flying Cloud Drive, which includes the Redstone property. Our comments relating to this section will be focused on the direct impacts that the recommended SWLRT line would have on Redstone and on its ability to successfully operate the existing restaurant business at the property. In our review of the SDEIS, it is clearly evident that the recommended SWLRT line route would result in substantial adverse impacts on Redstone's ability to operate its restaurant at the property.

Subsection 3.2.4.2 (Roadway and Traffic) of the SDEIS notes that the SDEIS was analyzed using a preemption strategy for LRT traffic signals, as opposed to the Traffic Signal Priority (TSP) operation that was used for the traffic study in the DEIS. In theory, the preemption strategy would represent the worst-case scenario for vehicular traffic. However, this strategy does not analyze the possibility of increased delays caused by the arrival of trains at the very end of the green cycle for the main line movement, the extension of the green light to service the train, and the transition back into that main line green before transitioning to service the minor driveway approaches. In other words, the analysis employed by the SDEIS does not accurately model the traffic signal delays caused by SWLRT that may be experienced by vehicle traffic seeking to enter or depart from the Redstone property. Delays of this sort occur frequently on the Green Line (Central Corridor Light Rail). Given the operational history of LRT in the Twin Cities Metro area, there is a significant potential for Redstone customers to have to wait up to three traffic signal cycles before being given the right-of-way. The analysis conducted for the SDEIS failed to address this situation and how it will impact the minor approaches at signalized intersections.

The intersections of Eden Rd/Eden Rd and Glen Rd/Eden Rd are not expected to meet vehicular signal warrants without the presence of the LRT. The traffic impact study states that driveways were included in the analysis. However, there is no evidence to support this claim. This

information must be provided to allow businesses to evaluate SWLRT impacts. Based on observations of the Green Line (Central Corridor), which also operates with TSP, phases are skipped and excessive delays on the side streets are experienced. Significant delays are not conducive to long term customer relations for a business. Redstone must be presented with the analysis showing the change in delay values from the No Build to the Build scenario to determine true impacts to customers entering and exiting the restaurant.

The traffic impact analysis presented in the SDEIS fails to accurately reflect traffic operations consistent with other LRT lines operating with TSP. It was also not included in the air quality section. With increased delays present on the minor approaches, there will be an increase in emissions along the corridor. This must be addressed.

Subsection 3.2.4.3 (Parking) of the SDEIS includes a chart that shows the Redstone property currently having 179 parking stalls. As a result of the SWLRT project as currently proposed, Redstone will lose 36 stalls due to the acquisition of part of the Redstone property, leaving only 143 stalls remaining. This loss of parking raises several issues that are inadequately addressed in the SDEIS.

We disagree with the number of lost parking stalls predicted by the SDEIS at the Redstone property and believe that the actual number of lost parking stalls will be much higher. The Redstone parking lot will need to be reconfigured as a result of the SWLRT project to provide adequate maneuvering space for delivery vehicles and to accommodate the relocation of the western parking lot access. This reconfiguration will eliminate several additional stalls currently unaccounted for by the SDEIS. Reconfiguring the parking lot will require City of Eden Prairie site plan approvals. The reconfigured parking lot must satisfy City setback requirements and may require variances from the City's zoning ordinance.

The loss of any parking stall is critical to the Redstone property. The Redstone parking lot is continuously full, and Redstone's patrons currently struggle to find parking spots. Redstone employees even now must park off-site to free spaces for Redstone customers. The loss of even a few parking stalls would be detrimental to Redstone's business operations. Based on our review, Redstone will have only 97 parking stalls remaining after construction of the SWLRT project, note the 143 parking stalls identified in the SDEIS. Redstone cannot accept additional stalls that are off the current Redstone property, especially to the east, as this would create too great of a distance for Redstone customers to walk to the restaurant's front door.

We believe that the acquisition of additional parking stalls along the southern edge of the Redstone parking lot adjacent to Eden Road and the proposed rail line will be necessary in order to construct the SWLRT. The engineered plans fail to show grading limits or cross sections to adequately account for grading impacts to our site. This must be addressed in the SDEIS.

Review of the engineered plans show there is only one to two feet between the parking stalls and the side of a train. This does not take into consideration vehicle overhang from the curb stop.

Furthermore, the SDEIS ignores the safety of Redstone's patrons parking and exiting their vehicles so close to the passing LRT. The safety of those patrons, especially those with small children and those visiting Redstone at night, is of great concern to Redstone. Redstone notes that, for approximately six months of every year, the majority of Redstone's patrons visit the restaurant after sunset. Redstone also notes that approximately 130 of its employees park off-site and therefore will be required to cross the SWLRT tracks when walking to and from their vehicles each workday. Current plans for the SWLRT do not provide for any sort of physical barrier between the Redstone parking lot and SWLRT rail line. These conditions are simply not safe, and they are not adequately addressed by the SDEIS.

Redstone's driveways will also be drastically impacted by SWLRT trains creating unsafe conditions at the access into and out of the Redstone property. The traffic impact study did not include any discussion regarding how the driveways at the Redstone property would be controlled in coordination with the associated train crossings. Will gate arms be provided for the driveways? Will the trains have the right of way through Redstone's driveways? What will be the speed of the LRT through the Redstone property? Redstone has concerns about the answers to these questions based on the frequency with which vehicles stop at rail crossings within the Twin Cities Metro area on or beyond the painted stop bar at those crossing combined with the proposed volume of LRT crossings expected across the driveways at the Redstone property. We have significant concerns regarding the safety of Redstone patrons entering and leaving the Redstone property. According to the traffic impact studies prepared for the SDEIS, there is an expectation of 10 minutes headway between train vehicles in the p.m. peak hour, consistent with the Blue Line and Green Line operations. "A 10 minute headway corresponds to 12 trains in the peak hour (six in each direction) which equates to one train approximately every five minutes." Redstone customers would be subject to delays, close encounters with the trains, and confusion maneuvering between the tracks and Eden Road, especially in the later hours. This will create a sense of fear and will cause potential customers to avoid the Redstone site, which will have significant negative impacts to the operation of Redstone's business operations.

Subsection 3.2.2.3 of the SDEIS notes that permanent noise impacts would not affect the area around Redstone. It does state that there is a moderate noise impact at one hotel, and moderate or severe noise impact at other nearby hotels. There were four sites where noise monitoring was conducted. The two monitoring sites closest to Redstone were N4 and N25, as identified on table 3.2-8 and Appendix H. Site N4 was conducted at the Lincoln Park Apartments in July-August of 2013 as part of SDEIS, and site N25 was conducted at the Homestead Hotel across from Lake Idlewild in 2010 as part of DEIS. Site N4 measured for 24 hours near the water tower and is representative of the ambient noise conditions at the Lincoln Park and Water Tower apartments plus Singletree Lane. According to Table 3.2-9 of the SDEIS, the Summary of Noise Impacts for Residential Lane Use is as follows:

Excerpt from SDEIS Table 3.2-9
Summary of Noise Impacts for Residential Lane Use – Eden Prairie Segment

Location	Distance from near LRT Track Centerline (ft)	Existing Noise Level (dBA)	Project Noise Level, LRT (dBA)
Lincoln Park Apartments	138	62	57
Water Tower Apartments	113	62	58
Residence Inn	44	61	65

Noise levels at 59 dBA are considered moderate, and noise levels over 64 are considered severe. With projected noise levels at 58 dBA, one level below a moderate level impact, further studies are needed to fully understand the noise impact in this area. How are the projected noise levels shown to be lower than the existing noise levels? The last few pages of Appendix H are a SWLRT Noise Fact Sheet which includes a table of Typical Maximum Noise Levels. According to this table, an LRT vehicle traveling at 45 mph at a distance of 50 ft from the noise source generates noise volumes in the range of 71-76 dBA. The noise analysis reported in the SDEIS does not have results consistent with the associated fact sheet and must be accurately addressed.

Furthermore, the noise impacts become more concerning with the numerous bells and horns that are emitted at intersections and stations are included. The SDEIS does not consider these impacts. Appendix H lists the dBA levels for the bells and horns used along train corridors (see below). The train speed will be at 45 mph when crossing the at-grade intersection at Flying Cloud Drive, and the use of LRT horns are therefore necessary. Bells are expected to be used at the Redstone driveway crossings if gates are provided, and will be used at the Town Center Station 750 feet away.

- LRT bells are sounded for 5 seconds as Light Rail Vehicles approach at-grade crossings
- Grade crossing bells will ring for 20 seconds for each train
- LRT horns would be sounded at an at-grade intersection when traveling 45 mph
- Bells would be sounded twice when entering/exiting a station
- Crossing bells have a sound exposure level of 106 dBA
- LRT bells have a sound exposure level of 88 dBA
- LRT horn have a sound exposure level of 99 dBA

The SDEIS states that LRT vehicles speeds are expected to range between 20 to 55 mph. The SDEIS fails to study the noise associated with an LRT vehicle braking as it approaches a station. The volume of noise from a braking train will be higher than the train noise itself, thus increasing the noise of an LRT vehicle approaching a station and at the Redstone property significantly more than what is described in this section of the SDEIS.

The SDEIS further fails to address noises associated with accessible pedestrian signals that will be installed at the proposed traffic signals near Redstone. While we recognize and support the need for such devices, they produce noise, are subject to noise pollution, are loud, and emit constant beeps and tones which will also have an impact on the dining experience at Redstone.

High noise levels are a very important concern with Redstone, as its business operations depend on a relaxing, enjoyable atmosphere for patrons dining in the restaurant and especially for those using Redstone's outdoor patio. With noise from the trains directly in front of the restaurant plus noise carried across Lake Idlewild from other areas of the SWLRT line, intense focus on the study of noise at Redstone is necessary to protect Redstone's business. The SDEIS only analyzed noise impacts associated with a residential area and did not take into consideration other types of uses, such as restaurants with outdoor patios. There are many such businesses in the area with outdoor facilities in addition to Redstone, such as Champps and Old Chicago. Redstone will lose the ambiance that its customers have come to know and expect with the relative quiet that is provided in Redstone's existing setting adjacent to a nature park, lake, and suburban environment.

Subsection 3.2.1.5 (Visual Quality and Aesthetics) of the SDEIS notes that viewpoint 9 was taken at the eastern end of the Redstone property looking west along Eden Road. That view shows the line of boulevard trees along the parking lot edge of Redstone. Due to the boulevard trees, the existing view score was Moderately Low while the anticipated change in visual quality and aesthetics scored Low due to the loss of those trees. In accordance with the SDEIS findings, the SWLRT project may reduce visual unity of the view unless design and landscape measures are taken. The visual quality of the view will be reduced because of the removal of vegetation and the introduction of the SWLRT tracks, which will reduce the visual intactness and visual unity for this view. The overall level of change in the visual quality of this view is Moderate, not Low as inaccurately stated in the SDEIS.

In review of the engineered plans there will not be enough space to plant trees between Redstone and the tracks nor along the sidewalk. The existing views from Redstone will be altered from trees to a LRT train and tracks with no space for screening. The removal of trees along the boulevard and the inability to screen the trains from our patrons and the public is a substantial negative impact to our business. We are a fine-dining establishment that promotes ambiance and a natural aesthetics atmosphere for our patrons.

Another objection to the SDEIS review of the visual quality and aesthetics near Redstone is the absence of any consideration of the view looking over Lake Idlewild and the trees that surround it. Lake Idlewild provides an aesthetic backdrop for the businesses in this area and is clearly

visible to the public driving on Eden Road or walking among the surrounding shops. We demand that further analysis be conducted on the view-sheds near Redstone so that the analysis includes views to the north across Lake Idlewild.

Subsection 3.2.4.5 (Safety and Security) of the SDEIS reviews the long-term direct and indirect safety and security impacts. Redstone is outraged by the newly introduced potential for violent train-vehicle or train-pedestrian conflicts that will be present at the at-grade crossing of roadways or driveways at and around the Redstone property. The SWLRT trains will be crossing not only Redstone's two driveways but also the intersection of Glen Road and Eden Road. There will be numerous Redstone patrons trying to get into and out of the Redstone property by vehicle or on foot. With SWLRT trains crossing in front of the Redstone property with unknown measures for public safety, Redstone may face potential liability arising from accidents caused by the SWLRT crossings near its property. The proposed SWLRT alignment simply creates too many conflict points between trains, vehicles and pedestrians in a very small and uncontrolled area.

The SDEIS identifies a sidewalk section for pedestrians that would require pedestrians to traverse a parking lot and use a sidewalk currently associated with another business (Brunswick Zone Bowl). This is unacceptable to Redstone. Easements are required to use a private walk for public use and liability will perpetually be an issue. Moreover, requiring pedestrians to walk through the middle of an existing parking lot creates considerable safety concerns. A safer alternative is to provide sidewalks along public roads. If the Town Center Station were located east of the intersection with Eden Road, then a sidewalk could be provided adjacent to Eden Road south to Singletree Lane. The SWLRT's blatant disinterest in the safety of its riders and Redstone's patrons requires correction and further study.

Summary

As noted above, the SWLRT project as currently designed will result in substantial adverse impacts on Redstone's ability to operate its restaurant. These substantial adverse impacts include, but are not limited to, the loss of parking, access restrictions, increased noise, visual impacts, safety concerns, and the creation of obstacles to the public enjoyment of existing natural amenities (e.g, Lake Idlewild) in the immediate vicinity of the Redstone property.

"The adequacy of an environmental impact statement is subject to challenge on both procedural and substantive grounds." *Minnesota Public Interest Research Group v. Adams*, 482 F. Supp. 170 (D. Minn. 1979). An environmental impact statement is substantively inadequate when an agency's "actual balance of costs and benefits" is arbitrary and when the agency gives "insufficient weight to environmental values." *Minnesota Public Interest Research Group v. Butz*, 541 F.2d 1292, 1300 (8th Cir. 1976). An EIS is likewise inadequate if it does not contain sufficient information to permit a reasoned choice of alternatives. *Id.* Moreover, an EIS "must not be so vague, general and conclusory that it cannot form the basis for reasonable evaluation and criticism." *Id.*

SWLRT SDEIS Comments

Idlewild Properties, LLC/Redstone American Grill, Inc.

July 21, 2015

Page 10

The SDEIS prepared for the SWLRT here is both substantively and procedurally inadequate. The costs and benefits set forth in the SDEIS are arbitrary and give insufficient weight to the environmental values that underlay NEPA and MEPA. Moreover, the SDEIS is so vague, general and conclusory in nature that it cannot form the basis for reasoned analysis of the true environmental, social and economic effects of the SWLRT

As such, the SDEIS prepared for the SWLRT here fails to fulfill the fundamental purposes of the National Environmental Policy Act, 42 U.S.C. 4432, et seq. or the Minnesota Environmental Policy Act, Minn. Stat. § 116D.01, et seq. “[T]he overall purpose of NEPA is to establish ‘a broad national commitment to protecting and promoting environmental quality.’” *Sierra Club v. United States Army Corp of Engineers*, 446 F.3d 808, 1126 (8th Cir. 2006), quoting *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 348 (1989). An EIS prepared pursuant to NEPA and MEPA must consider the “social and economic effects of [a] proposed agency action must ... once it is determined that the proposed agency action significant affects the physical environment.” *Id.* NEPA and MEPA require government agencies to evaluate environmental impact of a proposed government action and possible alternatives to that action before the agency takes any action that will “significantly affect the quality of the human environment.” *Id.* Notably, the term “human environment” must be interpreted “comprehensively to include the natural and physical environment and the relationship of people with that environment.” *Id.*

Here, the effect of the SWLRT on the “human environment” surrounding the Redstone property will simply be disastrous. It will irreparably disrupt the natural and physical environment in which the Redstone property is currently situated. Moreover, it will create hazards and inconveniences for people attempting to enter that environment in order to dine at Redstone. Finally, it will cause substantial economic hardships for Redstone and similarly situated businesses located along the proposed SWLRT route recommended by the SDEIS.

Redstone recognizes that there have been many changes to the SWLRT project since the release of the SDEIS. The Metropolitan Council has recently supported the elimination of the Mitchell Station and the deferment of the Town Center Station along with many other cost saving adjustments. To support cost reductions and a more efficient LRT operation, Redstone encourages the Project Office to act upon its request to re-examine the many issues raised in this letter and consider if past options or new options can provide a better alignment for the SWLRT. The Eden Prairie Segment carries numerous costs and environmental impacts that must be investigated further. The widening and extension of Eden Road is just one example. A second is the ability to avoid the wetland south of Costco if the line is realigned. As noted earlier, the Technology Drive and Singletree Lane alignments were considered viable options and deserve to be reconsidered now. We ask that the Metropolitan Council do so.

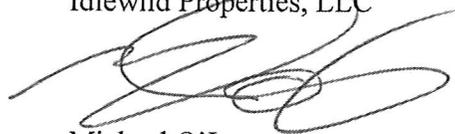
We look forward to working with you on addressing our concerns and finding solutions that benefit the SWLRT project, the City of Eden Prairie, Redstone and the public.

Very Truly Yours,

SWLRT SDEIS Comments
Idlewild Properties, LLC/Redstone American Grill, Inc.
July 21, 2015
Page 11



Craig A. Oberlander
Chief Manager
Idlewild Properties, LLC



Michael O'Leary
Chief Operating Officer
Redstone American Grill, Inc.

Enclosure

c: Bruce D. Malkerson, Esq., Attorney for Redstone
Tom Goodrum and Vern Swing, Westwood Professional Services, Engineering and
Planning Consultants for Redstone

Southwest Transitway

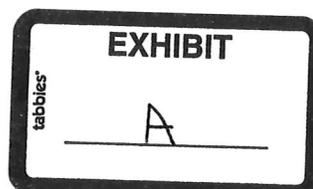
Town Center Station Location Considerations

General

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

Location Priorities

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



Potential MCA Station Locations

Location A – Town Center

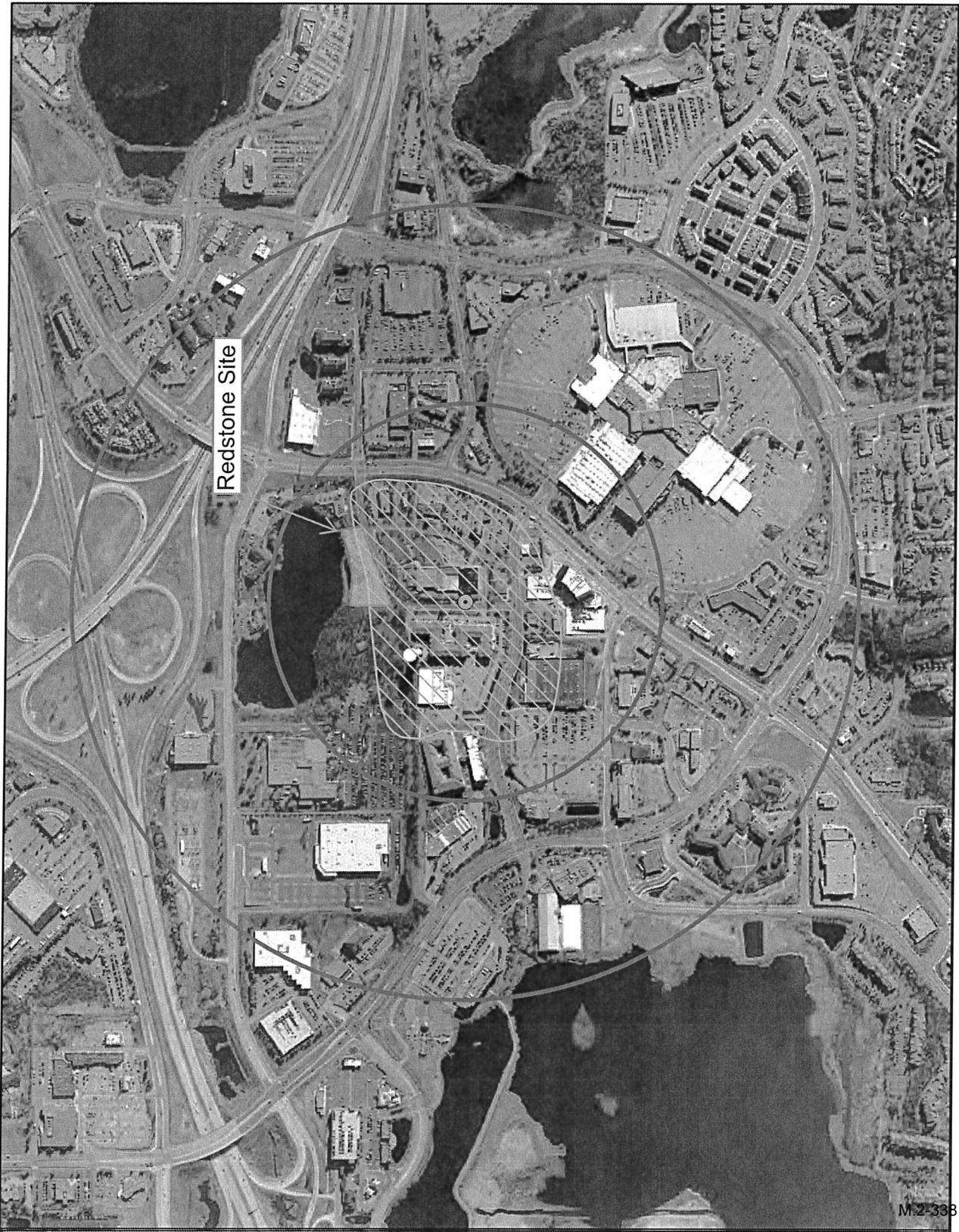
- Guide Plan Approved Town Center Location
- Close proximity to existing and future housing and employment densities
- Potential for planned re-development
- Walkable to Eden Prairie Center (across Flying Cloud Dr)
- Anticipated Moderate Track Alignment Impacts

Location B – EPC Northeast

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

Location C – MCA South

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



Legend

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

STATION AREA A



April 18, 2012



Redstone Site

Legend

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

STATION AREA B



April 18, 2012



Legend

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

STATION AREA C



April 18, 2012

From: [Kevin Kuemmel](#)
To: [swjrt](#)
Date: Tuesday, July 21, 2015 2:24:31 PM

Being a resident in Todd Park and close to Brookside, I'm extremely concerned about the increase in freight traffic. I am opposed to using public light rail money to increase train traffic in our neighborhoods. Seems ridiculous to use our money to decrease our quality of life. Thanks.

Best Regards,
Kevin O. Kuemmel
Senior Networking Account Manager
World Data Products
Phone: (763) 452-1310
Fax: (763) 452-1311
kevin.kuemmel@wdpi.com
IM: kevinkwdpi



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From: [Angie & Sandeep](#)
To: [swlrt](#)
Cc: [Mary Pattock](#); [Kathy KIAA Low](#)
Subject: Agreement with LRT Done Right
Date: Tuesday, July 21, 2015 2:21:17 PM

I endorse the response submitted today by the organization LRT Done Right in addition to comments I have personally submitted previously.

Angela Erdrich
612 516 6866
2217 Oliver Ave S
Minneapolis mn 55405

Sent by Angie Erdrich
angie_sandeep@yahoo.com



LIBERTY
PROPERTY
TRUST



July 17, 2015

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

Re: Comments of Liberty Property Trust Regarding OMF to be Located at Site 9A

Dear Ms. Jacobson:

Liberty Property Trust is the owner of the developed industrial properties at 1515 Sixth Street South, and 1600 Fifth Street South, Hopkins Minnesota, which will be taken for the proposed Operations and Maintenance Facility (OMF), Site 9A, Hopkins K-Tel East. As a property owner that will suffer the loss of two important industrial investment properties, we are deeply concerned about how this taking will impact us. We have reviewed the SDEIS and have the following comments on that document.

1. OMF Site 9A Selection Evaluation:

Our review revealed that Site 9A was not part of the original DEIS review and was only added as part of the SDEIS process and not subject to the same site selection evaluation that was done during the DEIS review. We understand that as part of the SDEIS analysis for a preferred OMF site a four step process was conducted that initially identified approximately 30 sites and through each step dismissed potential sites until site 9A was the final selection.

It appears to us that SDEIS failed to fully or properly evaluate the OMF site (identified in the SDEIS as site 9A) against comparable sites that were also being considered. We believe that additional information should be provided that will explain why site 9A was preferred over a number of others.

2. A Total Taking of the Liberty Property for OMF at Site 9A is Required

The SDEIS under Section 3.3.1.2 Acquisitions and Displacement indicates that there will be a full taking of both our industrial properties within the site 9A footprint. Liberty Property Trust concurs that any taking must be a full taking of each property.

The SDEIS notes that land which is acquired for the SW/LRT Project but not fully used for the OMF may be considered a remnant parcel and sold. Liberty Property Trust has no interest in buying back a remnant piece and there should be no expectation that such remnants will have any



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material economic value to Liberty. Liberty has previously conveyed this same information to representatives of the Met Council.

Liberty Property Trust has been an active participant in the public process and planning of the SWLRT. We are supportive of the project but recognize that a number of our properties will be taken if the project goes forward. Our concerns regarding the SDEIS reflect our past comments on the DEIS regarding our properties in Hopkins, Minnetonka and Eden Prairie, adjacent the Golden Triangle Station. Our earlier DEIS comments are attached for your convenience.

Finally, if the project goes forward, it is essential that our industrial tenants are fully compensated for their relocation costs and are given sufficient lead time to plan and execute a complex industrial plant relocation.

Liberty Property Trust

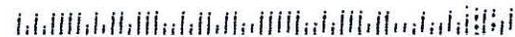
Richard Weiblen
Vice President, Development.



10400 Viking Drive, Suite 130 | Eden Prairie, MN 55344

Ms. Nani Jacobson
Assistant Director, Environmental & Agreements
Metro Transit – SWLRT Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

RECEIVED
JUL 20 2015
BY: *SJA*



From: [Joan Vanhala](#)
To: [swlrt](#)
Cc: Marisol.simon@fta.dot.gov
Subject: AMS SWLRT SDEIS comments July 21 2015
Date: Tuesday, July 21, 2015 2:31:47 PM
Attachments: [AMS SWLRT SDEIS comments July 21 2015 2.pdf](#)

Please accept the Alliance for Metropolitan Stability's comments to the Southwest Light Rail Transit Supplemental Draft Environmental Impact Statement.

Joan Vanhala, Coalition Organizer
Alliance for Metropolitan Stability
2525 E. Franklin Avenue #200
Minneapolis, MN 55406
612-332-4471; <http://www.metrostability.org/>

"If you think you are too small to make a difference, try sleeping with a mosquito." — Dalai Lama

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

From: Alliance for Metropolitan Stability
 2525 E. Franklin Avenue
 Minneapolis, MN 55406

Contact: Joan Vanhala, Coalition Organizer
 612-332-4471; joan@metrostability.org

Public Comment for the Southwest Light Rail Transit Supplemental Draft Environmental Impact Statement

July 21, 2015

The Alliance for Metropolitan Stability (AMS <http://www.metrostability.org/>) is a coalition of grassroots organizations that advances racial, economic and environmental justice in growth and development patterns in the Twin Cities region. Our 33 member groups (http://www.metrostability.org/about_us/member_list.php) represent communities of color, low-income communities, housing advocates, faith-based organizations, research and policy organizations, economic developers and environmental, transit and land-use policy advocates.

For the past 8 years AMS has been providing technical and organizing support to Environmental Justice communities along our metropolitan region's planned transitways to ensure that they are included in the decision making and receive community benefits from these major infrastructure investments.

Specific to these comments AMS has been working closely with New American Academy (<http://www.newamericanacademy.org/>) that serves the primarily Somali immigrant community in Eden Prairie. New American Academy has been active partners with the Southwest LRT Project Office in engaging their community members (<http://www.newamericanacademy.org/community.html>) in decisions related to alignment, station area planning, and developing the Eden Prairie Town Center development guidelines.

Eden Prairie Alignment:

AMS supports the Eden Prairie alignment: Adjustments to the proposed light rail alignment and LRT stations, generally from the intersection of Technology Drive and Mitchell Road to the intersection of Flying Cloud Drive and Valley View Road.

Yet with the July 8th, 2015 Metropolitan Council Southwest LRT budget decision to defer the Eden Prairie Town Center Station, on opening day a significant environmental justice community in Eden Prairie will be delayed the benefits of this \$1.7 billion public infrastructure investment.

Using EJView, the mapping tool of the Environmental Protection Agency, AMS found that within a 3 square mile area at the Eden Prairie Town Center Station:

- 40% minority
- 42% households under \$50,000
- 65% renters
- 23% under 17 years of age
- 10% 65 years and older*

* American Community Survey 2006 - 2010

We chose to look at a broader area than the ½ mile station area circumference to include residential areas south because of the medium density in this suburban city.

Equitable Development:

New American Academy in partnership with Twin Cities Local Initiatives Support Corporation as a Corridors of Opportunity Initiative funded by FTA/EPA/HUD Sustainable Communities developed Eden Prairie Town Center Development Guidelines. See <http://www.corridorsofopportunity.org/activities/LIC/CDI-Plus> for a description of this project. These development guidelines represent the economic opportunities and potential of the Southwest LRT station at Eden Prairie Town Center that would provide great benefits to the significant communities of color in this station area.

New American Academy presented these Eden Prairie Town Center Development Guidelines March 2014 to city council. The city of Eden Prairie has yet to respond or endorse these development guidelines. Without a station at Eden Prairie Town Center the opportunities to increase affordable housing and jobs for the communities of color will not be realized.

Attachments:

1. Eden Prairie Town Center Station map 3 square miles
2. Eden Prairie Town Center Station stats 3 square miles
3. Eden Prairie Town Center Development Guidelines 2013



Location: -93.447132,44.862622,-93.447132,44.839986,-93.407478,44.839986,-93.407478,44.862622,-93.447132,44.862622

Study Area: 0.0 mile around the polygonal location

Summary of ACS Estimates	2006 - 2010
Population	9,833
Population Density (per sq. mile)	2,936
Minority Population	3,955
% Minority	40%
Households	4,280
Housing Units	4,552
Housing Units Built Before 1950	52
Per Capita Income	45,303
Land Area (sq. miles) (Source: SF1)	3.35
% Land Area	92%
Water Area (sq. miles) (Source: SF1)	0.31
% Water Area	8%

	2006 - 2010 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	9,833	100%	632
Population Reporting One Race	9,647	98%	1,866
White	6,193	63%	514
Black	1,109	11%	388
American Indian	31	0%	93
Asian	1,839	19%	369
Pacific Islander	0	0%	93
Some Other Race	475	5%	409
Population Reporting Two or More Races	186	2%	93
Total Hispanic Population	787	8%	600
Total Non-Hispanic Population	9,046		
White Alone	5,878	60%	410
Black Alone	1,109	11%	388
American Indian Alone	31	0%	93
Non-Hispanic Asian Alone	1,839	19%	369
Pacific Islander Alone	0	0%	93
Other Race Alone	4	0%	93
Two or More Races Alone	186	2%	93
Population by Sex			
Male	4,983	51%	454
Female	4,850	49%	334
Population by Age			
Age 0-4	772	8%	157
Age 0-17	2,289	23%	308
Age 18+	7,544	77%	516
Age 65+	1,032	10%	216

Data Note: Detail may not sum to totals dues to rounding. Hispanic population can be of any race. N/A means not available.

Source: U.S. Census Bureau, American Community Survey (ACS) 2006 - 2010.



EJView ACS Summary Report



Location: -93.447132,44.862622,-93.447132,44.839986,-93.407478,44.839986,-93.407478,44.862622,-93.447132,44.862622

Study Area: 0.0 mile around the polygonal location

	2006 - 2010 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	6,549	100%	429
Less than 9th Grade	209	3%	144
9th - 12th Grade, No Diploma	356	5%	264
High School Graduate	784	12%	208
Some College, No Degree	1,728	26%	230
Associate Degree	660	10%	182
Bachelor's Degree or more	3,473	53%	287
POPULATION AGE 5+ YEARS BY ABILITY TO SPEAK ENGLISH			
Total	9,061	100%	577
Speak only English	5,962	66%	335
Non-English at Home ¹⁺²⁺³⁺⁴	3,099	34%	603
¹ Speak English "very well"	1,905	21%	407
² Speak English "well"	734	8%	279
³ Speak English "not well"	339	4%	260
⁴ Speak English "not at all"	122	1%	115
³⁺⁴ Speak English "less than well"	460	5%	268
²⁺³⁺⁴ Speak English "less than very well"	1,194	13%	375
POPULATION AGE 5+ YEARS BY LANGUAGE SPOKEN AT HOME			
Total	N/A	N/A	N/A
Speak only English	N/A	N/A	N/A
Non-English Speaking	N/A	N/A	N/A
Population by Place of Birth for the Foreign-Born			
Total	N/A	N/A	N/A
Europe	N/A	N/A	N/A
Asia	N/A	N/A	N/A
Africa	N/A	N/A	N/A
Oceania	N/A	N/A	N/A
Americas	N/A	N/A	N/A
Households by Household Income in 1999			
Household Income Base	4,280	100%	186
< \$15,000	283	7%	95
\$15,000 - \$25,000	345	8%	106
\$25,000 - \$50,000	1,139	27%	126
\$50,000 - \$75,000	921	22%	212
\$75,000 +	1,592	37%	199
Occupied Housing Units by Tenure			
Total	4,280	100%	186
Owner Occupied	1,510	35%	93
Renter Occupied	2,770	65%	186

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available.

2006-2010 ACS 5-year Estimates: The American Community Survey (ACS) summary files provide nation-wide population and housing characteristic data at all Census summary levels down to the Block Group level. This data was collected between January 1, 2006 and December 31, 2010. ACS replaces the decennial census sample data, and is not the 2010 Census population counts data. (<http://www.census.gov/acs/www/#fragment-3>)

Margin of error (MOE): The MOE provides a measure of the uncertainty in the estimate due to sampling error in the ACS survey. Applying the MOE value yields the confidence interval for the estimate. For example, an estimate value of 50 and +/- MOE of 5 means the true value is between 45 and 55 with a 90 percent certainty (http://www.census.gov/acs/www/Downloads/data_documentation/Accuracy/MultiyearACSAccuracyofData2010.pdf). Maximum MOE is shown for each value within study area.

Source: U.S. Census Bureau, American Community Survey (ACS) 2006 - 2010.

EDEN PRAIRIE TOWN CENTER DEVELOPMENT GUIDELINES

August, 2013



INTRODUCTION

Eden Prairie is a vibrant city known for its desirable housing, excellent business climate, quality schools and outstanding parks. It has been named one of Money Magazine's "Best Places to Live" in America since 2006; the city earned a first place ranking in the 2010 survey. Comprising many large lakes and ponds, the city has more than 170 miles (270 km) of multi-use trails, 2,250 acres (9 km²) of parks, and 1,300 acres (5 km²) of open space. Previously a bedroom suburb in the 1960s, the city is now home to more than 2,200 businesses and corporate headquarters. Regionally known for the Eden Prairie Center, it is also the hub for the proposed Southwest Light Rail Transit line. The population has increased 13.4% since 2000, with 62,258 residents in 2012. Part of that growth stems from an increase of East African families (2010 census data indicates 5.6% black or African American).

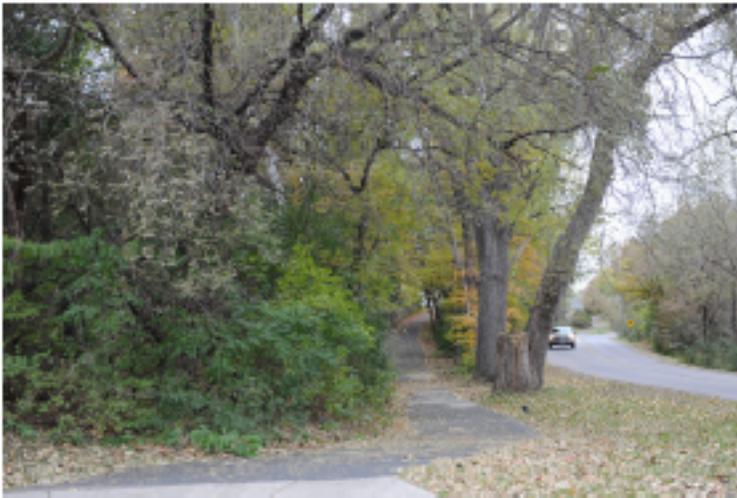
One of the proposed Southwest Light Rail Transit stations will be located in the Town Center area, a primarily commercial district that offers a mix of higher density housing, office and retail space, in close proximity to the Eden Prairie Center. The Town Center area is bordered by Regional Center Road to the south, Flying Cloud Drive to the east, Technology Drive to the north, and a proposed north/south roadway to the west between Costco and Emerson Rosemount. In 2005 - 06 the City of Eden Prairie commissioned a Major Center Area (MCA) study to examine and plan for the future of the area surrounding the Eden Prairie Center. The study was approved by the City Council in as an advisory tool for future redevelopment and public improvements, which recommended developing detailed design guidelines for future buildings, parking ramps, streetscape amenities, pedestrian/bicycle connections and other public spaces for the Town Center area.

Academy, a community-based organization of Somali and East Africans, and the Twin Cities LISC / Corridor Development Initiative to lead a series of community workshops to explore development options and scenarios to enhance the area, and to elevate the potential for a more transit-oriented and walkable neighborhood. Although the CDI community workshops were open to the general public, special recruitment was made to engage the Somali community, many of whom live in the Town Center vicinity. These development objectives are the result of the community workshops, and serve to inform the future development of the Town Center area.

ASSETS

The City of Eden Prairie:

- Maintains and enjoys a strong residential market;
- Is home to many businesses that provide quality jobs;
- Offers renowned regional and municipal parks, conservation areas, trails, and recreational facilities that are community centerpieces that attract people of all ages and abilities
- Provides a great place to raise a family, run a business, age in place, and recreate;
- Maintains a strong and diversified tax base, a healthy and vibrant local business climate with high-quality jobs that provide families with economic security;
- Values diversity and opportunity for its residents; and
- Takes pride in its strong school district.



Above: Examples of the housing, trails, and green space in Eden Prairie.

GUIDELINES: TOWN CENTER NEIGHBORHOOD

As a future station area along the Southwest Light Rail Transit corridor, the Town Center area is ideal to explore how transit-oriented development could enhance the area by addressing accessibility, livability, and strengthening the pedestrian environment. It will take a strong will by the City of Eden Prairie to set principles for sustainable redevelopment going forward, to guide investment, and measure every project against these principles.

The redevelopment of the area must complement the existing uses in the area, that are largely commercial, residential, and office space. Because there is a large population of Somali families that have located in the area, there is strong interest in the preservation of affordable housing that can accommodate larger families, and to offer economic opportunities for small business entrepreneurs, as well as access to jobs and opportunities throughout the region through close proximity to the regional light rail transit system. The Eden Prairie Major Center Area Study calls for a retail and housing core with a walkable mainstreet, which could incorporate affordable housing for families, seniors, and the growing need for multi-generational housing (<http://www.edenprairie.org/modules/showdocument.aspx?documentid=359>).

There is a shared value around the preservation of young families to preserve the high quality of the Eden Prairie schools, and to offer housing options to accommodate all stages of life. The Town Center area offers an important opportunity to create a more concentrated development pattern that would allow for a mix of uses, a mix of incomes, and greater pedestrian access to transit, goods, and services.

Town Center District - Block Exercise Site



RECOMMENDATIONS FOR REDEVELOPMENT INCLUDE:

I. Enhance Opportunities for Mixed-Use and Mixed-Income Projects

- A. Promote mixed-use development that incorporates retail, office, and residential uses;
- B. Provide for a mix of housing options that could accommodate different household sizes (e. g. 3 – 5 bedroom units), configurations, incomes, homeownership and rental, as well as generational diversity;
- C. Incorporate affordable workforce and family housing and affordable commercial space where ever possible to create opportunities for diversity and local small business entrepreneurs.
- D. If government resources are required to fill financial gaps, focus on affordable housing that serves a mix of housing needs (e.g. size of family, seniors), and supports local multi-cultural businesses.
- E. Identify and address existing housing gaps through development opportunities presented through investments along the Southwest LRT corridor (e.g. age, mix of owner and rental, family size, income level, etc.)
- F. Blend into and complement the existing neighborhood.
- G. Consider elements that enhance “indoor-outdoor” experience, such as balconies and screened porches, and courtyards to create open spaces;
- H. Encourage underground parking or structured parking to enhance pedestrian experience;
- I. Ensure economic development opportunities including home ownership opportunities that are culturally appropriate



II. Create a destination as a light-rail transit district or area

- J. Enhance the livability of the area for residential uses by strengthening the pedestrian orientation to create greater access to transit, goods, services, and regional amenities (e.g. create a pedestrian overlay to enhance walkable connections throughout the area);
- K. Strengthen or link to natural amenities and places for outdoor recreation;
- L. Include opportunities for youth and family recreation, such as centers that attend to gender specific needs and opportunities;
- M. Incorporate green spaces;
- N. Consider and minimize the ecological impact;
- O. Utilize CPTED (Crime Prevention Through



- P. Prioritize transit and housing accessibility to accommodate people with disabilities;
- Q. Seek to create alternative education and job training opportunities (e.g. alternative schools, job training for public sector employment, etc.) for young people, families, and adults;
- R. Provide opportunities for intercultural interaction to build stronger community ties;
- S. Incorporate signage and way-finding in multiple languages;

III. Create commercial spaces for small business entrepreneurs to build assets and job opportunities for the local community

- T. Explore ideas like the Midtown Global Market, Suuqa Karmel, and Urban Bazaar (in San Francisco) to provide opportunities for small business entrepreneurs to locate in the area, serving the local community with culturally specific goods and services.
- U. Consider locations for a farmers market or grocery store that would provide access to healthy foods for people that live in the area.
- V. Encourage a mix of commercial spaces that include small, mid, and large scale commercial users.



For further information, contact:

Molly Koivumaki
 Housing & Community Services Manager
 City of Eden Prairie
 952-949-8439
Mkoivumaki@edenprairie.org



2925 - 12th Street East
Glencoe, MN 55336
(320) 864-7200
FAX (320) 864-7220

July 17, 2015

VIA EMAIL AND U.S. MAIL

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



Re: Response to Metropolitan Council’s Southwest Transitway Supplemental Draft
Environmental Impact Statement

Dear Ms. Jacobson:

Please find for inclusion in the office record the response of Twin Cities & Western Railroad on the Metropolitan Council’s Southwest Transitway Supplemental Draft Environmental Impact Statement. These comments are set forth in the attached.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads 'Mark Wegner'.

Mark Wegner
President
Twin Cities & Western Railroad
Phone: 320-864-7204
Email: mwegner@tcwr.net
Website: www.tcwr.net

Enclosure

Twin Cities & Western Railroad Company Response to Metropolitan Council's Southwest Transitway Supplemental Draft Environmental Impact Statement

Twin Cities & Western Railroad Company (TC&W) responded to the Southwest Transitway Draft Environmental Impact Statement (DEIS) in December 2012, and the issues raised in that response remain valid for this response. TC&W's response to the DEIS can be found at <http://tcwr.net/responsetodeis/>.

TC&W's comments should be viewed in the context that TC&W serves numerous Counties, Communities and Customers in south central Minnesota and South Dakota. Over the last 10 years our shippers and their customers have collectively invested over \$100 million in expanding and enhancing their freight rail facilities, creating additional jobs and economic growth in the area of rural Minnesota served by TC&W. These businesses have made these massive investments based on the understanding that their freight rail service will, at minimum, remain at its current level. This is a fair and reasonable understanding, given the protective mandate of the United States Surface Transportation Board (STB), which has exclusive jurisdiction over freight railroad transportation, including economics and service levels. Our response to the SDEIS, therefore, is made with the purpose of preserving TC&W's ability to continue to provide freight transportation economically and at current service levels.

Changes in Scope/Elements

There are two changes in scope/elements from the October 2012 DEIS to the May 2015 SDEIS that affect TC&W.

- **Freight Route:** The SDEIS avoids the relocation of freight traffic traversing north on the CP MN&S line (from a point in St. Louis Park just east of Louisiana Avenue), and instead continues freight traffic traversing north via the Kenilworth Corridor (at Cedar Lake Junction just west of downtown Minneapolis). This results in a co-location of freight trains and light rail between these points and through the Kenilworth Corridor (co-location was planned from approximately Shady Oak Road in Hopkins to the point in St. Louis Park just east of Louisiana Avenue in both the DEIS and the SDEIS). TC&W will refer to this change as "Co-locate" within this document.
- **Freight Alignment Change:** The SDEIS contemplates moving the SWLRT from the north side of the existing freight rail to the south side of the future freight rail location, by shifting the freight rail to the current bike trail alignment by angling the freight rail north, just east of 169, and building a bridge to carry the LRT from north of the freight rail to south of the freight rail just east of Hopkins. TC&W will refer to this change as "Alignment Change" within this document.

Comments Related to above Scope/Element Changes

Freight Route – Service Disruption during Construction:

TC&W staff and consultants worked diligently with Met Council’s staff and consultants from January 2013 until present to arrive at a plan that would retain the freight service south central Minnesota depends on, while at the same time preserving the “Locally Preferred Alternative” (LPA) for the Southwest Transitway.

There have been extensive documentation and discussion of the engineering and construction challenges of building the SWLRT in the Kenilworth Corridor from the point southwest of the lagoon connecting Cedar Lake to Lake of the Isles to the point where the LRT’s Lake Street station is planned. It is TC&W’s understanding that with the SDEIS, the SWLRT is at the approximately 30% engineering phase. The discussions with Met Council and staff have occurred with the understanding that TC&W will allow the SWLRT contractors to work during the day and the freight trains will be able to operate safely from the close of the SWLRT construction day until the beginning of the following construction day. This will delay freight rail, but with careful planning, managing and communication it can be done. It has also been noted at the 30% engineering phase that the bridge swap at State Highway 100 would create a significant service outage for TC&W customers. Having TC&W cease operations during construction for periods longer than the work windows described above would be disruptive to TC&W’s service obligation that its customers rely upon.

Freight Route – Safety & Public Perception:

Our comment is made in the context that freight railroad operations are largely a mystery to the general public. They get noticed if the motorists must stop at a railroad crossing for a train, or a derailment makes the news, but otherwise the general public has little knowledge of freight railroads. Unfortunately, public perceptions of freight rail service are colored by highly publicized but relatively isolated incidents such as the ignition of flammable Bakken crude oil that occurred when a train derailed and ruptured in December 2013 in eastern North Dakota. Most Minnesotans do not know that 99.999997% of freight rail shipments arrive safely at their destinations.

Given the public’s current perception of freight rail (particularly the safety of freight rail), it is important that Met Council communicate with the affected neighborhoods not only the safety precautions built into the construction plan, but also any contingency plans should a natural disaster occur during construction (wind storm, rain, deluge, etc.). Also, an emergency response plan ought to be part of the construction plan and this should be communicated to the affected neighborhoods and public officials.

Freight Alignment Change – Cost cutting options affecting TC&W:

Our comment is made in the context of the announcement in April 2015 that the costs of the SWLRT, as shown in this SDEIS had increased to approximately \$2 billion. The reaction by elected officials and decision-makers, since that announcement, has been to cut the costs of the SWLRT to approach the earlier \$1.6 billion estimate.

In comments relating to the Alignment Change, the SDEIS discusses, as a result of the Alignment Change, the elimination of the side tracks that TC&W currently uses for sorting freight and staging freight cars. The SDEIS does not mention building replacement track capacity at a location further west along the TC&W. Replacement track capacity must be built by Met Council as part of the cost of the SWLRT project in order to meet Federal STB requirements and preserve the existing shipper service levels provided by TC&W to its customers. The expense of providing replacement track capacity must be factored into the project, and cannot be included in the cost cutting being considered by the Met Council. It should also be noted that severing the southerly connection from the CP Bass Lake Spur to the CP MN&S is not a cost cutting option as this connection provides freight rail access for grain producers in south central Minnesota to move their product to the river barge terminals located in Savage, MN.

Conclusion

TC&W remains committed to providing safe, efficient and reliable freight service to its south central Minnesota customers, as well as providing safe passage through the neighborhoods in the Twin Cities metropolitan area in which we operate. As planning moves towards 90% engineering, within the context of cost cutting, the safe passage of freight during and after SWLRT construction and effective and continuous operations must not be compromised.

Attached is a list of the Cities, Counties and Customers that provided letters of support of TC&W's response to the DEIS (<http://tcwr.net/responsetodeis/>). All of these constituents remain extremely interested in the SWLRT process with respect to the preservation of their freight rail service.

List of entities that responded to the DEIS in support of TC&W's response

ADM – Benson Quinn (Minneapolis, MN)
Agri-Trading (Hutchinson, MN)
Bird Island Bean Co, LLC (Bird Island, MN)
Bird Island Soil Service Center (Bird Island, MN)
Central Bi-Products (Redwood Falls, MN)
Clifton Co-op Farmers Elevator Association (Clinton, MN)
Cloud Peak Energy Resources, LLC (Decker, MN; Broomfield, CO)
Co-op Country Farmers Elevator (Renville, MN)
Corona Grain & Feed (Corona, SD)
Dairy Farmers of America (Winthrop, MN)
Equity Elevator & Trading Company (Wood Lake, MN)
Farmers Co-operative Elevator Co. (Hanley Falls, MN)
Farmers Union Coop Oil Company (Montevideo, MN)
Farmers Cooperative Oil & Fertilizer (Echo, MN)
FGDI (St. Louis Park, MN)
Form-A-Feed, Inc. (Stewart, MN)
Glacial Plains Cooperative (Murdock, MN)
Granite Falls Energy, LLC (Granite Falls, MN)
Hanley Falls Farmers Elevator (Hanley Falls, MN)
Heartland Corn Products (Winthrop, MN)
L.G. Everist, Inc. (Sioux Falls, SD)
Lyman Lumber Company (Excelsior, MN)
Meadowland Farmers Coop (Lamberton, MN)
Midwest Asphalt Corporation (Hopkins, MN)
Minnesota Grain & Feed Association (Eagan, MN)
Minnesota Valley Regional Rail Coalition
Mosaic Company (Savage, MN)
RPMG Inc. (Shakopee, MN)
Seneca Foods Corporation (Glencoe, MN)
Seneca Foods Plant (Arlington, MN)
South Central Grain & Energy (Fairfax, MN; Gibbon, MN; Hector, MN; Buffalo Lake, MN)
Southern Minnesota Beet Sugar Cooperative (Renville, MN)
Step Saver, Inc. (Redwood Falls, MN)
United Farmers Cooperative (Winthrop, MN)
Western Consolidated Cooperative (Holloway, MN)
Western Co-op Transport Association (Montevideo, MN)
Wheaton Dumont Co-op Elevator (Wheaton, MN)
United Grain Systems, LLC (Winthrop, MN)

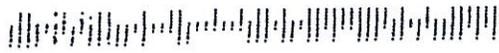
City of Arlington
City of Bird Island
City of Buffalo Lake

City of Glencoe
City of Hector
City of Milan
City of Montevideo
City of Morton
City of Norwood Young America
City of Olivia
City of Plato
City of Sacred Heart
City of Stewart
City of Winthrop

Big Stone County
Carver County
Grant County (South Dakota)
McLeod County
Minnesota Valley Regional Rail Authority
Redwood Area Development Corporation
Redwood County
Upper Minnesota Valley Regional Development Commission
Renville County
Renville County HRA/EDA
Roberts County
MinnRail, Inc.
Sibley County Economic Development Commission
Sibley County Auditor
Sibley County
Sibley County Attorney
Wright County
Yellow Medicine County

TC&w

TWIN CITIES & WESTERN
RAILROAD COMPANY



2925 12th Street East
Glencoe, Minnesota 55336



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



From: [Cherie](#)
To: [swlrt](#)
Subject: FW: Calhoun Isles Conominium Association Response SDEIS
Date: Tuesday, July 21, 2015 9:30:10 PM
Attachments: [Calhoun Isles response to SDEIS 07212015.pdf](#)

This is being submitted on behalf of the Calhoun Isles Condominium Association by Cherie Hamilton, President of the Board of Directors

From: pimentamalageta@hotmail.com
To: pimentamalageta@hotmail.com
Subject: FW: Calhoun Isles Conominium Association Response SDEIS
Date: Wed, 22 Jul 2015 02:25:33 +0000

Whereas in response to requests for comments to SDEIS; therefore, we the Board of Calhoun-Isles Condominium Association representing 144 living units submit the following document expressing our concerns on the engineering methods proposed for construction of the shallow tunnel.

Cherie Hamilton

President

Calhoun-Isles

Condominium Association

3141 Dean Court, Minneapolis, Minnesota 55416

July 21, 2015

Executive Summary:

Calhoun-Isles Condominiums are converted 90 year old grain silos located at the narrowest point, commonly called the "pinch-point", along the proposed Southwest LRT route. To accommodate the passage of two LRT rails, the Kenilworth Bike Trail, and the single TC&W heavy railroad track through this narrow gap, a shallow or "cut-and-cover" tunnel is proposed to be constructed for the LRT tracks, with the TC&W line and bike path to be above the tunnel at grade. Construction of the proposed tunnel comes within two feet of the Calhoun-Isles footings.

In April 2015, a high frequency vibratory hammer driving technique was used to install sheet piling at a six-story apartment site located at 3118 West Lake Street. Heavy vibrations were felt and structural damage occurred at the adjacent site of Loop Calhoun Condominiums, 3104 W Lake St., and at Calhoun-Isles Condominiums, located 180 feet away at its closest point. These damages and vibrations resulted in the cessation of construction and the implementation of a different method for installing pilings, namely an "H" pile structural piling system.

Seismic readings recorded at Calhoun-Isles by engineering firms contracted by the construction companies' engineers did not correlate to vibrations and damages incurred. Whether these inconsistencies were the result of the unique structure of Calhoun-Isles concrete silo construction or unknown environmental conditions is unknown.

Furthermore, it has been learned that a hydraulic "press-in" technique is typical to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs.

Therefore, we feel the Met Council's two stated techniques for driving the needed sheet pilings for the construction of the shallow tunnel are not suited for the conditions found in the Kenilworth Corridor. The hydraulic, high-frequency vibratory hammer method presents a unique risk to residents and structure at Calhoun-Isles. The hydraulic "press-in" method is not feasible given the soil conditions that exist.

We urge the Met Council to suspend the SDEIS process, to develop a viable method for installing sheet piles or its facsimile, and to demonstrate the feasibility of this yet-to-be-developed method at the "pinch-point". If this rigorous, but necessary process is not accomplished successfully, there is concern that the construction of the shallow tunnel will not be able to go forward, that private residences will need to be expropriated, and that the two LRT rails, the Kenilworth Bike Trail, and the railroad track will all wind up at grade at the south end of the Kenilworth Corridor.

Findings:

Trammell Crow acquired the 1.89-acre site at 3118 Lake Street to develop a six-story apartment building with 164 units. Trammell Crow hired Big D to construct the apartment complex. Big D hired AET (American

Engineering Testing) to do monitoring and engineering work and Trammell Crow hired Braun Intertec to do replicate monitoring and engineering work.

The construction phase of the project began in early 2nd quarter 2015. Two types of piling were installed at 3118 Lake Street, driven "H" piles and Sheet Piles. The driven "H" piling that was installed in mid-April caused initial neighborhood concerns and damage to both Loop Calhoun and Calhoun Isles Condominium Associations. Only a limited number of driven "H" piles were installed, and this phase of the project is complete. In late April and early May, Dig D conducted various trials using vibratory hammers to install sheet piles.

On April 30th, the Calhoun Isles Condominium Association Team met with Big D, American Engineering Testing, and Braun Intertec personnel on the 10th floor of the Calhoun Isles High Rise to discuss the status of the construction project and to help gain further insights on its impact on the High Rise. During the meeting, we learned that no pre-existing condition surveys were recommended for our Association because it is ~180 feet away from the nearest point of the construction site. It was thought that our Association buildings were too far away from the construction site to be damaged.

This situation was quickly addressed by installing monitoring devices in the High Rise to obtain vibration measurements. The results of these measurements are pending. The preliminary indications from the monitors supported the initial assumption. The readings were at the low end of scale; in fact, the monitors had to be adjusted, in order to obtain any readings at all. It was also agreed that American Engineering Testing would conduct pre-existing condition surveys at Calhoun Isles.

This meeting was held while trials using vibratory hammers to install sheet piles were occurring. The High Rise is ~180 feet from the construction site. The vibrations that were felt in the 10th floor conference surprised Big D, American Engineering Testing, and Braun Intertec.

Despite the low readings on the monitors, seven High Rise and three Lateral units have since reported damage as a result of the construction activities. A number of home owners reported feeling high levels of noise and vibration during the April/early May construction activities. Vibrations were felt in the elevators.

Given the fact that the shallow tunnel construction is to occur within 2 to 3 feet (not 180 feet) of the High Rise, our Calhoun Isles Condominium Association Team had a number of follow-up discussions about the impact that the SWLRT would have on our Association Buildings. The vibratory sheet piling installation is one of the options that the Met Council is considering for the construction of the shallow tunnel.

The speed of sound through concrete is as much as 3600 m/s; it is a very effective vibration transmitter. The High Rise was constructed from a series of grain silos. The concrete footings that support the silos go well below ground level. It is a unique building not only when compared to other local structures, many of which are wood construction atop concrete foundations (wood will not transfer vibration energy nearly as well as concrete will). It is also unique compared to other tall concrete structures in the area as its walls are ultra-thick. The entire structure is great at transmitting sound and vibration.

The High Rise has a number of features, which are susceptible to vibration. The underground garage was built when the silos were converted to residences. Three elevators were installed in the High Rise. The silos have an exterior stucco coating; it is a high-maintenance exterior. Balconies have been installed on nearly all High Rise units.

Based on discussions with a number of civil engineers and physicists, the impact on the High Rise from vibratory hammers to install sheet piles at a distance of 2 to 3 feet could be catastrophic. The possible consequences include:

1. Damage to nearly all the resident units in the 3151 Building (the structure closest to the proposed SWLRT line).
2. The elevator service in the High Rise would probably need to be shut down because of safety concerns.
3. The stucco could fall down in sheets due to resonance effects. This situation could result in injury or worse to residents.
4. The integrity of balconies could be compromised. This situation could result in injury or worse to residents.
5. The integrity of the garage could be compromised. This situation could result in injury or worse to residents.

On May 18th, Big D announced that the vibratory sheet piling installation was halted, that any installed sheet piling will be removed, and that an alternate foundation system will be developed. We since learned that the damage that the vibratory sheet piling installation caused to Loop Calhoun (primarily) and Calhoun Isles (secondarily) during the trial period was instrumental in the abandonment of this approach at the 3118 Lake Street Site. All the sheeting piling that had been installed has since been removed.

On July 6th, Trammell Crow/Big D announced the revised foundation plan that will be installed. This system will be an "H" pile structural piling system. It will involve these operations: 1) a hole, approximately 24" in diameter is drilled with an auger and filled with structural concrete as the drill bit is removed; 2) the "H" pile will then be pressed into the structural concrete hydraulically and allowed to cure. This process repeats approximately every 8' on center; 3) once structural "H" piles are complete, an additional drilling process will occur between all "H" piles to install a 24" concrete slurry piling as the structural piles to serve as the structural site retention component.

Big D will conduct trials to install this "H" pile structural piling system starting the week of July 20th. The drilling will not be vibratory or driven in methods and while not particularly quiet, the level of noise and movement of equipment will be heard and occasionally felt but remain significantly below industry standards and city ordinances.

Discussion:

The Met Council provides limited reference to the construction methods that they propose employing in the SDEIS. These construction methods are referenced in their attachment, "Kenilworth Shallow LRT Tunnel Basis of Design Technical Report (Council, 2014d)". This document describes two methods for installing the required sheet piling for the shallow tunnel: "Sheet pile installation is anticipated to be performed by a method that avoids hydraulic drop hammers. Methods such as a high frequency vibratory hammer or a hydraulic "press-in" device would minimize vibration and noise created by the sheet pile installation. Actual construction means and methods will be determined prior to construction in coordination between the contractor and the SPO (page 4)".

The vibratory driving technique for installing sheet piling has caused too much damage to the neighborhood based on the experiences at 3118 Lake Street and has been eliminated as a means for installing sheet piling by the contractor in the CIDNA neighborhood.

The hydraulic “press-in” methodology was discussed at some length with Big D, American Engineering Testing, and Braun Intertec to determine its feasibility. Based on their feedback, it was learned that a “press” technique is “typical” to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs. It should also be noted that the current proposal for installing sheet piling (drilled “H” piling) at this site will be substantially more expensive to install than employing a hydraulic pressing technique.

Met Council personnel were questioned about these two proposed methods for installing sheet piling for the shallow tunnel. In one response, a Met Council spokesperson informed the public that the vibratory hammers that Dig D employed to install the sheet piling at the 3118 Lake Street site were of inferior quality and this factor resulted in the damage to the two neighborhood associations. It was further reported that the Met Council would be using higher quality vibratory hammers and no problems would occur.

This matter was brought to Big D’s attention; they reported it is unreasonable to label the equipment that they used as “inferior”, but would be more appropriately labeled as “typical” in the industry.

In another instance, a Met Council Engineer was questioned about the proposed hydraulic “press-in” methodology. He insisted that this approach was valid and that it was the preferred route, despite the feedback that has been received from Big D, American Engineering Testing, and Braun Intertec.

An attempt was made to discuss these sheet piling methods directly with American Engineering Testing (AET) to gain additional information and insights. AET personnel informed me that they were under contract to the SWLRT and could not talk to me because of a conflict of interest. They told me to contact Met Council personnel directly.

Given this feedback from Big D, American Engineering Testing, and Braun Intertec, there is sufficient documented information available that demonstrates that the Met Council will not be able to use either a vibratory hammer or a hydraulic press to install the sheet piling for the shallow tunnel. These constraints will force the Met Council to employ alternate methods for installing sheet piling for the shallow tunnel.

The only other known method known for installing sheet piling is to employ the drilled H-pile Lagged System that will be attempted at the 3118 Lake Street site. The engineering company (AET) that is working on this site developed this recommendation. This very same engineering company is now under contract to the Met Council. One would logically conclude that they will make the same recommendation to the Met Council.

This installation method will be complicated by several factors:

1. This drilled H-pile Lagged System approach will be substantially more expensive than what is advertised in the SDEIS.
2. The concrete to stabilize the drilled H piles will need to be installed below the water table. This factor will complicate the installation. In addition, it may compromise integrity of the installation.
3. The drilling operation will occur within one to two feet of the Calhoun Isles Condominium Association and within close proximity of the Cedar Lake Shores Condominium Association and to many private residences along the Kenilworth Corridor. This drilling operation is anticipated to be noisy. The Met Council may need to find temporary housing for residents who live in proximity to the shallow tunnel construction site.

4. The size of the holes to install the drilled "H" piling raises additional concerns. As noted, holes approximately 24" in diameter will be drilled with an auger at the 3118 Lake Street site. This system will support a piling system that is 25 feet below grade. The shallow tunnel will require a piling system that will be 50 feet below grade. The holes for the drilled "H" piles may need to be larger for the shallow tunnel. There is limited space at the pinch point, ie the short distance between Calhoun Isles and Cedar Lake Shores Condominium Associations. It may not be possible to install this drilled "H" structural piling system without infringing upon and/or taking private property (including homes) at this point.

Conclusion and Recommendations:

The experiences at the 3118 Lake Street site raise a number of serious questions about the proposed methods that the Met Council intends to employ when constructing the shallow tunnel. The proposed methods include using a high frequency vibratory hammer or a hydraulic "press-in" device to accomplish the sheet pile installation.

The high frequency vibratory hammer driving technique for installing sheet piling caused too much damage to the CIDNA neighborhood based on the experiences at 3118 Lake Street and has been eliminated as a means for installing sheet piling by the contractor. It has also been learned that the hydraulic "press-in" is typical to an installation more common to a harbor, waterway or soft soils conditions. This condition does NOT exist in the 3118 Lake Street environs.

The information about sheet piling installations that has been gathered during the past 12 weeks is based actual field experience and expert opinion from quality engineering companies. It has also been learned that American Engineering Testing, a company that acted as a primary consultant in developing an alternate sheet piling system for the 3118 Lake Street project, is under contract to the Met Council.

It is imperative that the SDEIS process be suspended until a viable construction method for installing a sheet piling like system for the shallow tunnel is properly developed with input from a quality engineering company such as American Engineering Testing. Once this alternate (and most likely more expensive) system is developed, its feasibility must be successfully demonstrated.

If this rigorous, but necessary process is not accomplished successfully, there is concern that the construction of the shallow tunnel will not be able to go forward, that private residences will need to be expropriated, and that the two LRT rails, the Kenilworth Bike Trail, and the railroad track will all wind up at grade at the south end of the Kenilworth Corridor.

I wish to thank Trammell Crow, Big D, American Engineering Testing, and Braun Intertec for the rigorous process that they employed at the 3118 West Lake Street construction site. While the noise and vibration from the initial sheet piling installation methods were below industry standards and city ordinances, they realized the problems that were being caused to the neighborhood in short order. They had the integrity to go back to the drawing board and to develop a system that would conform to the neighborhood requirements, despite the added cost. They should be commended for their willingness to share their findings and their process with the public.

Submitted By: Calhoun Isles Homeowners association Board of Directors

Barbara Dorset

Mark Haller

Cherie Hamilton

Nina Katzung

Paul Olson

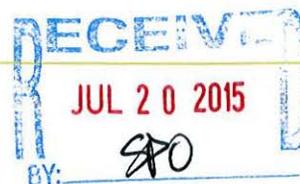
Paul Petzschke

Carol Shorrock

Peter Stegner

Nick Shuraleff

BACHMAN'S



July 17, 2015

SENT VIA US MAIL and EMAIL

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

Dear Ms. Jacobson:

The purpose of this letter is to provide comments for Bachman's, Inc. and its Eden Prairie location, 770 Prairie Center Drive, on the SWLRT Supplemental Draft Environmental Impact Statement (SDEIS).

Chapter 2: Alternative Considered:

All of the rail alignments recommended in the original DEIS showed the SWLRT line along Technology Drive. This reasonably demonstrates that the preferred route and the route best suited for the SWLRT is along Technology Drive. We understand the SDEIS was authorized to review this alignment based on political requests by the City of Eden Prairie and a few impacted businesses. However, it must be assumed that Technology Drive is the most advantageous alignment for the efficient operation of the rail corridor as originally concluded. If the line could be located on the north side of Technology Drive the objections of those businesses could be resolved. Moving the line from Technology Drive will do the following:

- Lengthen travel times
- Impact more businesses
- Impact more roads and intersections
- Require the construction of a new road
- Require crossing more intersections
- Create more safety risks

We appreciate the fact that the at-grade alignment along Singletree and Prairie Center Drive is not being considered. We have significant concerns about that alignment for safety reasons and negative access impacts on our property. We prefer a north side of Technology Drive alignment to the proposed alignment along the steep slope between Bachman's and Costco.

Ms. Nani Jacobson
Metro-Transit-Southwest LRT Project
July 17, 2015

Chapter 3.2 Eden Prairie Segment, Wetlands:

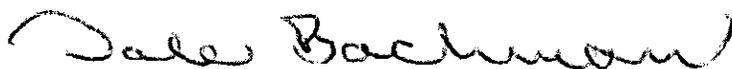
We have concern about the impact to the steep slope and the Costco stormwater pond/wetland along the north side of our site. The impact of grading is not addressed adequately in the SDEIS. We would request the Project Office to provide grading plans as they become available to ensure that the grading of the steep slope does not negatively impact our property. In addition the SDEIS notes that the Costco stormwater pond/wetland will be impacted. We are concerned about the potential impact that may occur with the removal/replacement of the Costco pond. Additional information must be provided on how and where the stormwater pond will be replaced.

Chapter 3.2 Eden Prairie Segment, Acquisitions:

The Construction Plans available on the Project Office website show the project will need a temporary construction easement along the north side of our property. The proposed easement is shown to come up against our north wall and within our parking, loading dock, and storage areas. We require more information on the length and impact of the construction work on our store operations. We must not lose access to our only loading dock. Losing access to our only loading dock would have significant negative impact on our business operations.

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

Sincerely,



Dale L. Bachman
Chairman / Chief Executive Officer

DLB:cad

Executive Office / cad

BACHMAN'S

6010 Lyndale Avenue South, Minneapolis, MN 55419-2289

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BY: SPO

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

55426+1724



M.2-374

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

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

Nani –

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

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

We appreciate the opportunity to comment.

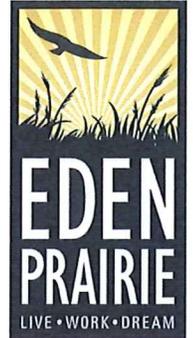
Thank you -

Randy

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

July 21, 2015

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



SUBJECT: Southwest LRT SDEIS Comments

Ms. Jacobson:

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

General Comments

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

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

Detail Comments

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Rick Getschow
City Manager

CC: Mayor and City Council

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

RESOLUTION NO. 2015-73

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

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

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

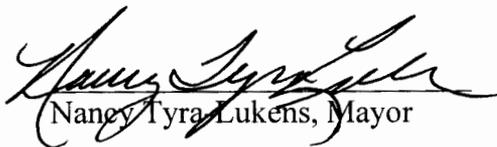
WHEREAS, the Federal Transit Administration and the Metropolitan Council determined that a Supplemental Draft Environmental Impact Statement (SDEIS) is needed to document environmental impacts that were not identified in the DEIS; and

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

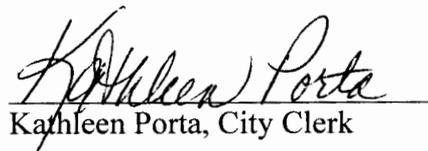
WHEREAS, the City Council appreciates the opportunity to review the SDEIS and desires to respectfully submit comments on the SDEIS.

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

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


Nancy Tyra Lukens, Mayor

ATTEST:


Kathleen Porta, City Clerk

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

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

Thank you.

Ray

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

July 21, 2015

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

Dear Ms. Jacobson:

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

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

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

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

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

The MPRB is obligated to ensure that parks and trails and the interests of current and future park and trail users are not substantially impaired by the project. It is within this context that the MPRB makes the comments contained in this letter. As stated in the MPRB's comments on the DEIS, there are several overarching messages the MPRB wishes to express

regarding the SWLRT project:

- MPRB remains supportive of light-rail transit.
- Current development and public use of the corridor within Minneapolis has an open and natural character that includes portions of the Minneapolis Chain of Lakes Regional Park, Grand Rounds National Scenic Byway, Kenilworth Regional Trail, Cedar Lake Regional Trail, and Cedar Lake Park. Park design in this area focuses on serenity, habitat restoration, minimal development, and passive recreation. To retain the area's character the water table levels and quality, cultural landscapes, habitat, and open space must be protected and preserved.
- Other parks in or near the corridor include Alcott Triangle, Park Siding Park, and Bryn Mawr Meadows. These parks serve more neighborhood use and maintaining existing park settings, access, and use are clear priorities of the MPRB.
- Visual quality and noise are key areas of concern for the MPRB. The introduction of light rail transit in combination with freight rail poses the potential for significant disturbance to a corridor that, once disturbed, may never regain the "dense regular massing of trees bordering the corridor [that] creates a highly memorable element," as noted in the SDEIS.
- The seamless connections between and among parks and trails is a key attribute of the Kenilworth Corridor, one which the MPRB believes should be present in the corridor to at least to the extent it is today after introduction of the combination of LRT and freight rail.
- The perpetuation of freight rail in the Kenilworth Corridor, which the MPRB believes makes that infrastructure a permanent element, is a substantive change from the DEIS, one that varies dramatically from a long-held understanding of the use of the corridor and one that poses significant safety concerns for trail users and the natural setting and environment of the corridor.

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

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

Sincerely,



Liz Wielinski
President, Minneapolis Park & Recreation Board

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

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

July 21, 2015

CONTINUATION OF FREIGHT RAIL OPERATIONS IN THE KENILWORTH CORRIDOR

REVIEW

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

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

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

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

OUTCOMES

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

SDEIS SECTION 3.4.1.3 (CULTURAL RESOURCES)

REVIEW

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

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

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

OUTCOMES

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

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

REVIEW

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

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

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

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

OUTCOMES

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

SDEIS SECTION 3.4.1.5 (VISUAL QUALITY AND AESTHETICS)

REVIEW

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

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

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

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

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

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

OUTCOMES

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

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

SDEIS SECTION 3.4.2 (ENVIRONMENTAL EFFECTS)

REVIEW

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

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

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

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

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

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

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

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

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

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

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

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

OUTCOMES

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

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

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

REVIEW

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

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

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

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

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

OUTCOMES

- A. Minneapolis Chain of Lakes Regional Park and adjoining parkland remains a quiet, tranquil, and natural park destination.
- B. The area between Lake Street and I-394 is naturally beautiful and serene.
- C. Bike and pedestrian trails remain with the same or better design quality and width as current trails; these include those that run along and across the corridor, as well as access trails.

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

Minneapolis Park and Recreation Board Southwest Transitway DEIS Comment Letter



Lake Calhoun



Cedar Lake



Lake of the Isles



Lake of the Isles V.2-400

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Transmittal Letter

December 5, 2012



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

Dear Project Manager:

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

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

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

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

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

President
John Erwin
Vice President
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Commissioners
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Jon C. Olson
Anita Tabb
Scott Vreeland
M. Annie Young
Superintendent
Jayne Miller

Secretary to the Board
Michael P. Schmidt



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

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

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

Sincerely,



John Erwin

President, Minneapolis Park and Recreation Board

Introduction

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

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

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

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

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

MPRB Community Advisory Committee

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

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

Appointers and CAC members are below:

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

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

Comment Letter Structure

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

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

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

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

Corridor and Comment Location Map



Co-Location Alternative

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

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

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

1 Entire Corridor

1.1 Location and Description

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

1.2 Issue: Section 4(f) analysis

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

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



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

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

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

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

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

1.3 Issue: Design character

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

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



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

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

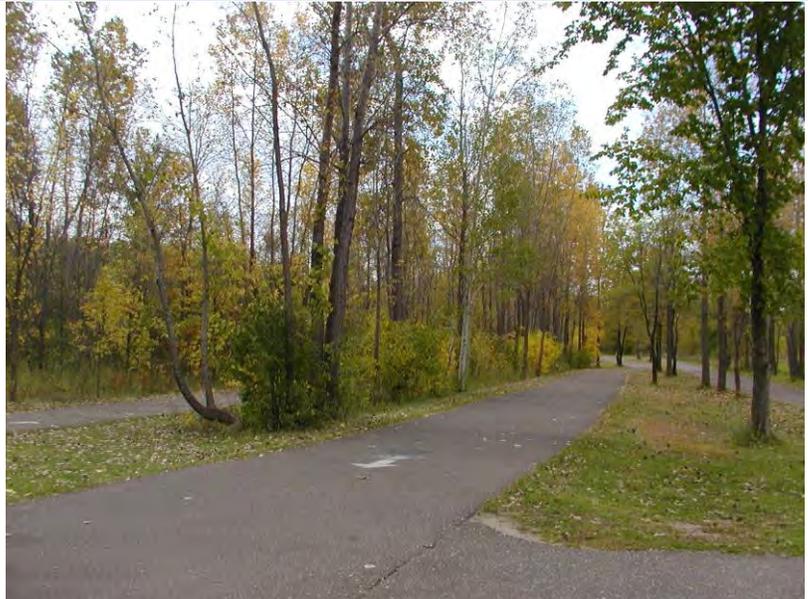
transportation uses or facilities, it does specify guidelines for controlling both point source and non-point source pollutant discharge within the Shoreland Overlay District.

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

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

1.4 Issue: Trail access, use, and maintenance

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



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

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

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

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

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

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

1.5 Issue: Noise and Vibration

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

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

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

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

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

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



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

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

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

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

1.6 Issue: Visual appeal

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

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

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

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

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

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

1.7 Issue: Safety

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

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

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



Timely public safety access is essential

1.8 Issue: Construction

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

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

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

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

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

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

during construction.

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



MPRB Prairie Maintenance near Cedar Lake Park

2 Linden Avenue

2.1 Location and Description

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

2.2 Issue: Access, flow

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

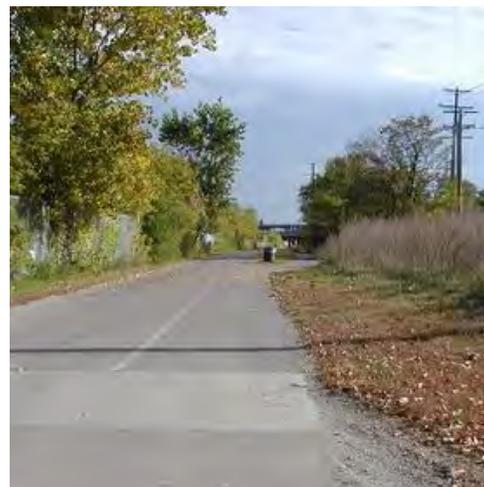


Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

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



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



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

3 Luce Line Regional Trail Junction

3.1 Location and Description

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

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



3.2 Issue: Access, flow

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

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

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



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

4 Spring Lake Trail Junction

4.1 Location and Description

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

4.2 Issue: Access, flow, and connectivity

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

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

4.3 Safety

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

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

4.4 Issue: Comprehensive approach

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

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



From junction, looking southeast toward Spring Lake

5 Bryn Mawr Meadows Park

5.1 Location and Description

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

5.2 Issue: Access and safety

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



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

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

5.3 Issue: Visual appeal

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

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

5.4 Issue: Comprehensive approach

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

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

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



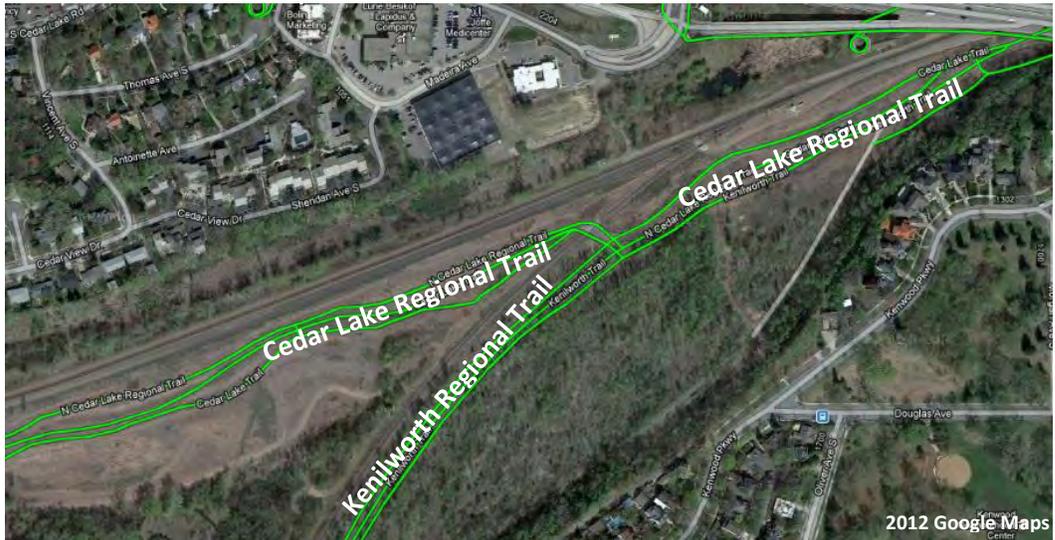
Bryn Mawr Park, looking south from Morgan Avenue

6 Cedar Lake Regional Trail and LRT Crossing Area

6.1 Location and Description

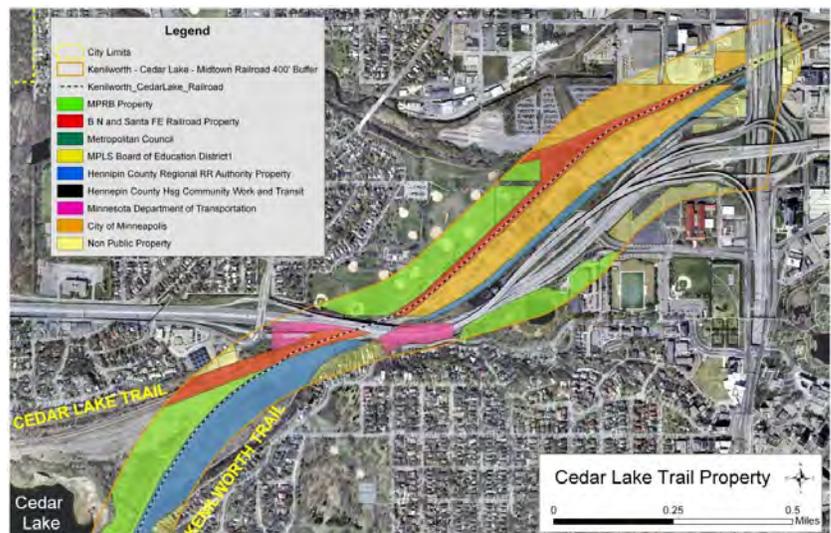
The federally funded Cedar Lake Regional Trail carries commuter and recreational bicyclists and pedestrians between downtown Minneapolis and the western suburbs.

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



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

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



6.2 Issue: Safety, use, access, connectivity

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

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

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

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



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



At junction, looking west along divided Kenilworth Regional Trail

6.3 Issue: Environmental protection

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

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

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



Cedar Lake Park and Cedar Lake Regional Trail - Prairie

7 Intersection with West 21st Street

7.1 Location and Description

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

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



7.2 Issue: Park access



At intersection, look west into Cedar Lake Park

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

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

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

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

7.3 Issue: Safety

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

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

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

7.4 Issue: Aesthetics, noise

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

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

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

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

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



Looking SW from 21st Street



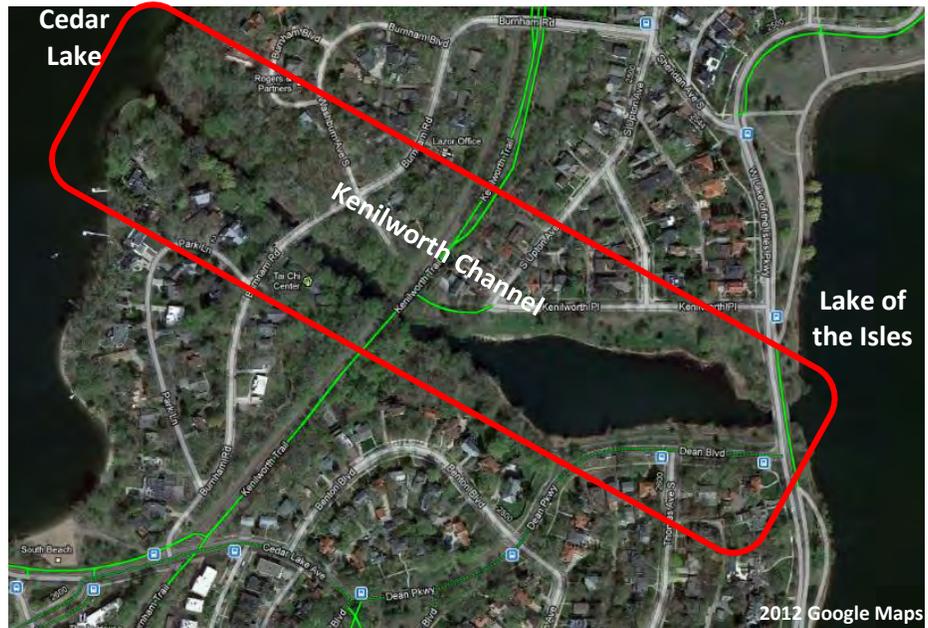
Cedar Lake

8 Kenilworth Channel, Bridge

8.1 Location and Description

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

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



8.2 Issue: Historic character, aesthetics, tranquility



Kenilworth Channel

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

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

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

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

8.3 Issue: Connectivity and recreational use

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

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

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



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

8.4 Issue: Safety



Cedar Lake Park Association Photo

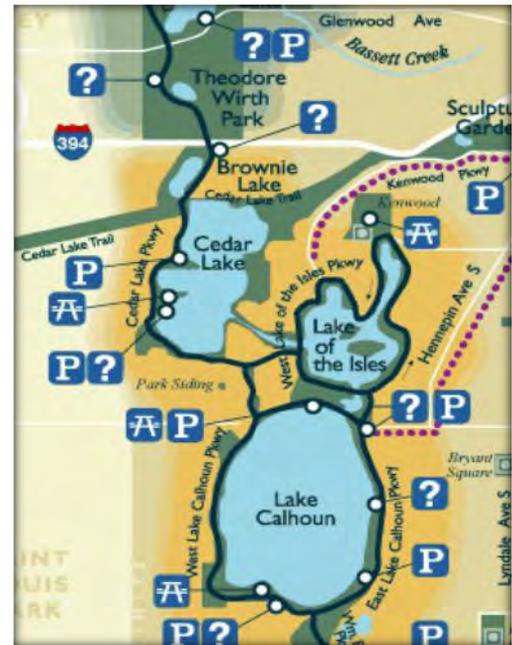
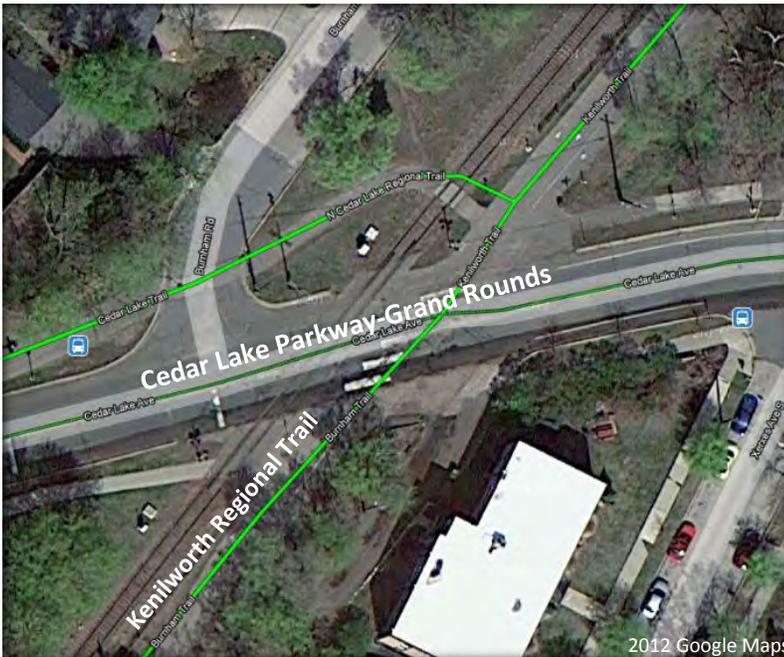
From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Loppet

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

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

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

9 Cedar Lake Parkway-Grand Rounds



Cedar Lake Section of Grand Rounds

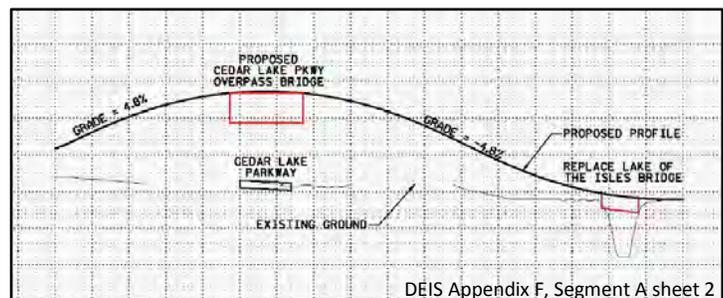
9.1 Location and Description

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

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

9.2 Issues: Integrity, flow, and access

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



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

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

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

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

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

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

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

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

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

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



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

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

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

9.3 Issue: Safety

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

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

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

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

9.4 Issue: Noise and air quality

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

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

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

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



At junction, looking NE along Kenilworth Regional Trail



From Kenilworth Regional Trail looking toward Cedar Lake, Grand Rounds

10 Park Siding Park

10.1 Location and Description

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

10.2 Issue: Access and safety

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



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

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

10.3 Issue: Visual appeal

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

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

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

10.4 Issue: Noise

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

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

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



Park, looking SE from Kenilworth Regional Trail access



Kenilworth Regional Trail access, looking toward corridor



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

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

11.1 Location and Description

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

11.2 Issue: Park and trail access

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



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

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



12 Northwest Corner of Lake Calhoun Area

12.1 Location and Description

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



12.2 Issue: Park and trail access

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

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



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

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

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

13 Appendix A – Cedar Lake Parkway/ Southwest Transitway

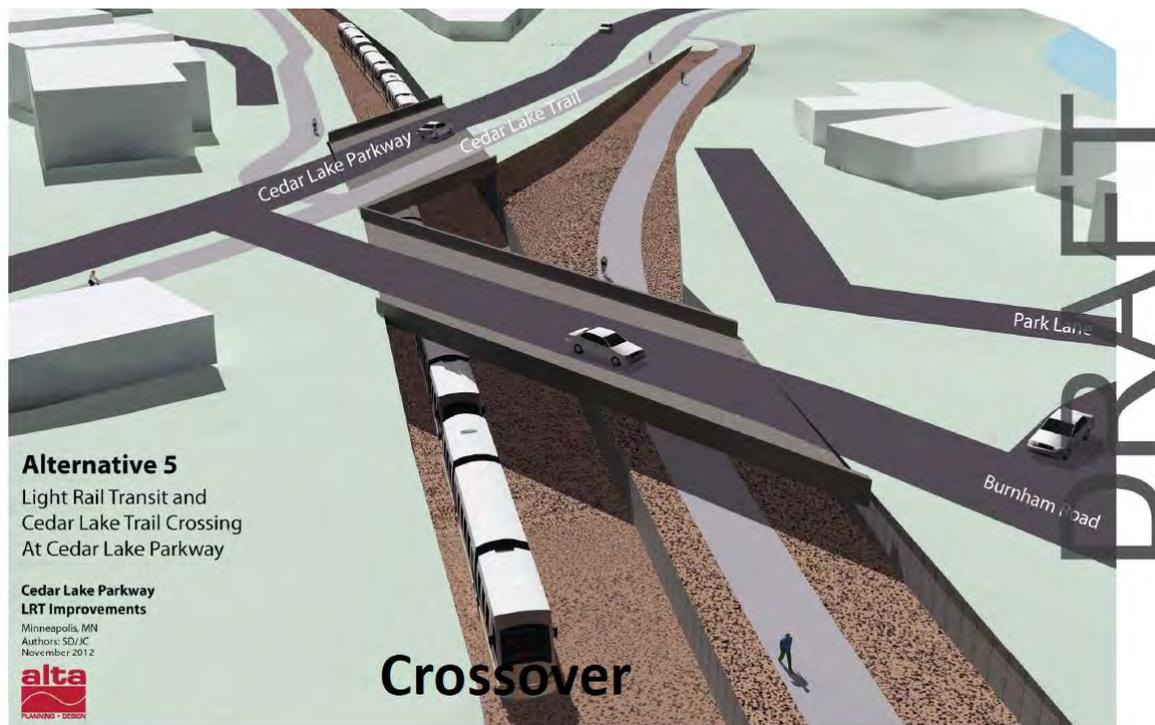
Appendix A is intended to illustrate the concept of lowering the train and trail and bridging Cedar Lake Parkway at the Cedar Lake Parkway/Southwest Transitway intersection. This concept is discussed in Section 9 of this comment letter. The following pages contain a few key images of the analysis conducted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

Below Grade



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

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



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July 17, 2015



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

RE: Comments and Objections of Stuart Companies to Supplemental Draft EIS (SDEIS) and Supporting Reports of Westwood Engineering and ESI Engineering

Dear Ms. Jacobson:

Stuart Companies has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the Met Council. We were struck by the document’s failure to adequately consider important issues affecting Stuart’s residential development north of Smetana Road in Minnetonka and Hopkins. These omissions, including failure to properly identify, analyze and consider noise impacts, and inadequate consideration of alternative sites which would avoid such adverse impacts, and failure to adequately consider risks of the release of environmental contaminants, are described in more detail in the attached reports done by Westwood Engineering and ESI Engineering. These reports are incorporated as part of Stuart’s comments and objections.

It should be apparent from the matters discussed in the ESI and Westwood Reports that the SDEIS has been rushed and is defective in key respects. It should not have been necessary for Stuart Companies to retain its own engineering firms to identify issues that should have been investigated as part of the Project’s own environmental studies. Nonetheless, we have done this work and provided it to you. Please take note of the issues and adverse impacts raised that have not been properly considered in the SDEIS. Your response should consider and address these incorporated reports.

We strongly object to this process going forward until the environmental impacts on our property – which will be severe and disruptive to a quiet and protected residential property with more than 1,500 residents – are correctly analyzed and considered. This is especially true since a preferable alternative using 11th Avenue is readily available at a lesser cost.

Sincerely,

STUART COMPANIES


 Stuart H. Nolan
 Chairman and Founder


 Lisa Moe
 President and CEO

Corporate Headquarters
 1000 West 80th Street
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 ☎ (952) 948-9500
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www.stuartco.com

July 17, 2015

Ms. Lisa Moe
StuartCo
1000 West 80th Street
Minneapolis, MN 55420

Phone (952) 948-9506



ESI ENGINEERING, INC.
7831 Glenroy Road/Suite 430
Minneapolis, Minnesota 55439
Tel: (952) 831-4646
Fax: (952) 831-6897
Internet: esi-engineering.com

**Supplemental Draft EIS Comments
Southwest Transitway Light Rail Noise and Vibration
StuartCo – Minneapolis, Minnesota**

Dear Ms. Moe,

We have completed an initial review of the May 2015 Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the Met Council for the Southwest Light Rail Transit (SWLRT) project. We understand the last day for public comment is July 21, 2015. The following are our findings related to noise and vibration impacts to your properties north of Smetana Drive in Hopkins, Minnesota.

As you are aware, the SDEIS references the Draft EIS issued October 2012. Several assumptions used by the Met Council's consultants for the noise and vibration analysis are listed in Chapter 4 of the DEIS, including the following:

- The LRT makes 198 trips between 7:00 am and 10:00 pm
- 60 trips are made between the hours of 10:00 pm and 7:00 am
- 16 trips are made each hour during peak hours (6:00 am to 9:00 am and 3:00 pm to 6:30 pm)
- There are three articulating cars per transit train
- Train speeds vary in different segments of the corridor, ranging from 20 to 50 miles per hour
- LRT bells are used for five seconds as vehicles approach at grade crossings, crosswalks, and station platforms.
- Grade crossing bells are used for 20 seconds for each train. (from Appendix H of 2015 SDEIS)

Operations and Maintenance Facility Location

Figure 1 shows the location of the proposed Hopkins Operations and Maintenance Facility (OMF) in comparison to nearby StuartCo properties. In the review of possible environmental categories effecting OMF sites, several categories were dismissed for review for Site 9A, Hopkins K-Tel East. These dismissed categories include noise and vibration impacts. According to the FTA guidelines in the 2006 Transit Noise and Vibration Impact Assessment document, the screening distance required for noise assessments from "yards and shops" is 1000 feet. Figure 1 shows a circle with a radius of 1000 feet with a center at a point on the south end of the proposed Hopkins OMF site location. Multiple StuartCo residential units fall within this area, with the closest unit being approximately 750 feet from the proposed Hopkins OMF. Clearly a noise impact assessment will be needed per the FTA requirements and none was done. Noise from the OMF will also need to meet the MPCA requirements, which may be more restrictive.

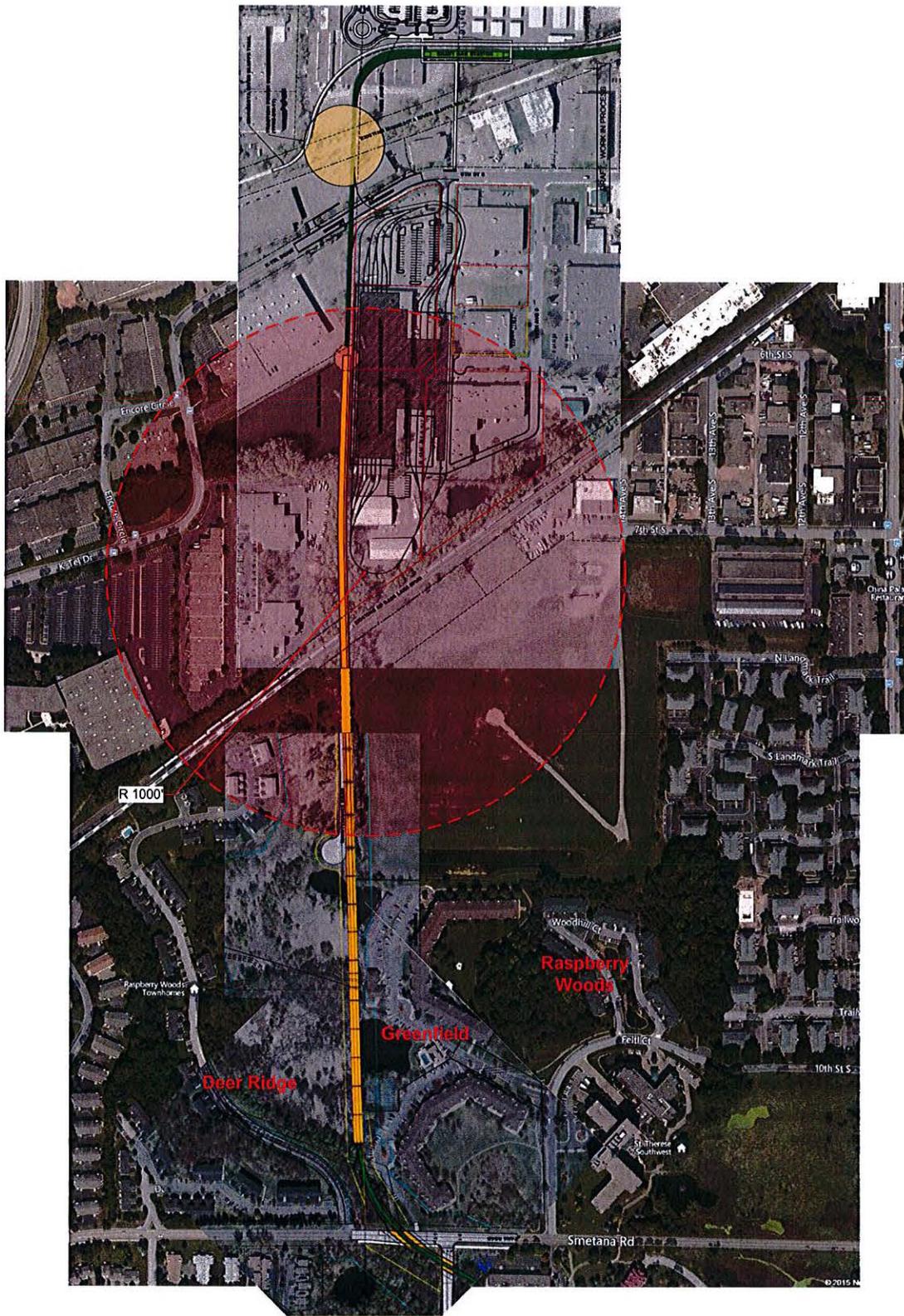


Figure 1 – Hopkins Operations and Maintenance Facility Location

Existing Noise and Vibration Assessments

Appendix H of the DEIS includes the representative receptor/clusters used in the noise assessments that were done for the project. In an evaluation of the Distance to track and Unit count columns, the noise assessment data given in the DEIS appears to be inaccurate regarding the representative receptor properties for the StuartCo properties.

Table 1 is a summary of the clusters assessed in the DEIS Noise Assessment Table that are near Smetana Drive in Hopkins and the StuartCo properties. The main column categories we are concerned about are highlighted in red. Based on our review, the values listed for distance to track are too large to represent the Greenfield buildings. The shortest "distance to track" length that was listed in the DEIS for the 3-F segment is 125 feet. According to our estimates, there are apartments and townhomes in this track segment that are less than 100 feet from the track. Additionally, the unit count data for the eastbound clusters does not match an expected unit count for the Greenfield properties that would fall into these clusters.

Based on a review of the clusters listed in Table 1 that are greater distances than the StuartCo properties, we expect the impact assessment for the StuartCo properties, had it been done, would be in the severe range.

We do not find that a vibration impact assessment was completed for the Greenfield or other StuartCo properties. The FTA screening distance for a vibration assessment for residences is 150 feet. Since these apartments are within that distance, it is necessary for the vibration impacts to be assessed.

Event Building

An outdoor social event building is located on the north side of the Greenfield property. This particular building is less than 30 feet from the proposed LRT tracks. Because there are no cluster identifiers within the 3-F segment that are listed as being even somewhat within this distance from the tracks, it is apparent that this particular unit has been overlooked in the noise assessment. The screening distance for vibration is 100 feet for this type of building (Land Use Category 3), which means a vibration assessment is also required.

Rail Crossovers

Segments of the track with crossovers or turnouts can produce an increase in noise level of up to 6 dB and an increase in vibration levels of up to 10 dB. These assumptions are stated in the SDEIS, but are not stated as assumptions in the DEIS noise and vibration assessment for StuartCo's properties. The drawings do not show where railway crossover locations are positioned. However, if there are crossovers near the StuartCo properties, it is necessary for these to be included in the impact assessments.

Elevated Rail

Portions of the track nearby StuartCo properties are proposed to be elevated on bridges due to ground conditions and ponds. When track is built on an elevated structure rather than on ground, there is potential for additional structure-borne noise. This additional impact has not been addressed in the noise assessment for this area. Figure 2 shows the elevated track near the StuartCo properties. The effects of the elevated rail structure should be included in the impact assessment.

Table 1 – Noise Assessment Summary for Segment 3-F Near the StuartCo Properties

Cluster Identifier	Count		Land Use Category	Side of Guide way	Distance to track (ft)	Train Speed (mph)	Noise Metric	Existing Noise Level (dBA)	Impact Criteria		Project Related Noise (dBA)	Cumulative Noise Level (dBA)	Increase Over Existing (dBA)	Impact Level	Number of Impacted Receptors	
	Land	Unit							Moderate (dBA)	Severe (dBA)					Moderate (land [units])	Severe (land [units])
3-F-EB-2-13	3	99	2	EB	938	50	Ldn	62	59	64	55	63	1	None	-	-
3-F-EB-2-14	1	1	2	EB	187	50	Ldn	62	59	64	66	67	5	Severe	-	1 [1]
3-F-EB-2-15	1	1	2	EB	164	50	Ldn	62	59	64	71	72	10	Severe	-	1 [1]
3-F-EB-2-18	1	1	2	EB	230	50	Ldn	62	59	64	66	67	5	Severe	-	1 [1]
3-F-EB-2-19	3	3	2	EB	528	50	Ldn	62	59	64	63	66	4	Moderate	3 [3]	-
3-F-EB-3-8	1	1	3	EB	607	50	Leq	62	64	69	57	63	1	None	-	-
3-F-WB-1-3	1	1	1	WB	125	50	Leq	62	59	64	61	65	3	Moderate	1 [1]	-
3-F-WB-2-16	1	1	2	WB	295	50	Ldn	62	59	64	63	66	4	Moderate	1 [1]	-
3-F-WB-2-17	1	1	2	WB	200	50	Ldn	62	59	64	70	71	9	Severe	-	1 [1]
3-F-WB-2-20	13	19	2	WB	344	50	Ldn	62	59	64	68	69	7	Severe	-	13 [19]
3-F-WB-2-21	33	33	2	WB	449	50	Ldn	62	59	64	64	66	4	Moderate	33 [33]	-
3-F-WB-2-22	7	13	2	WB	673	50	Ldn	62	59	64	62	65	3	Moderate	7 [13]	-
3-F-WB-3-7	1	1	3	WB	1056	50	Leq	62	64	69	52	62	0	None	-	-

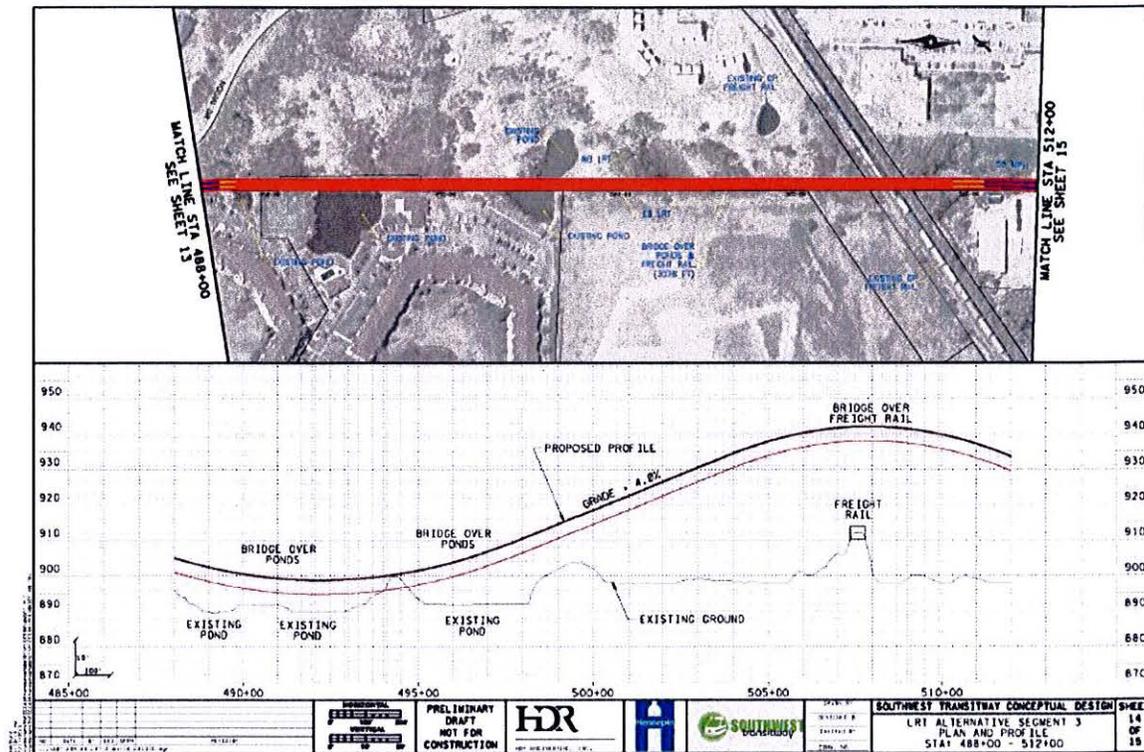


Figure 2 - Elevation of track in SDEIS Appendix F

Construction Vibration and Noise

Appendix H in the DEIS has a section on construction noise; however we do not find that an assessment has been done. Considering the extremely close proximity of the construction to the StuartCo properties, and the number of affected residences, construction vibration and noise will need to be studied and alternate construction methods may need to be considered. We are particularly concerned about the pile driving vibration and noise impacts.

We appreciate the opportunity to work with you on this project and remain available to assist in the resolution of these and any other matters. Please let us know if you have questions or need more information.

Sincerely,

Anthony J. Baxter, P.E.
ESI Engineering, Inc.

July 17, 2015

Ms. Lisa Moe
Stuart Companies
1000 West 80th Street
Minneapolis, MN 55420

RE: Supplemental Draft EIS (SDEIS) Comments
Operations and Maintenance Facility Location, Hopkins

Dear Ms. Moe,

At the request of Stuart Companies, Westwood Professional Services (Westwood) has completed our review of the SDEIS. Based on our review we found numerous shortcomings in the SDEIS's analysis of and preference for the selection of the Operations and Maintenance Facility (OMF) at the SW corner of K-Tel and 16th Avenue in Hopkins (Site 9A, Hopkins K-Tel East). Though by no means exhaustive, these problems are the result of the lack of information provided on the Environmental Resources studied for the OMF site, and the lack of findings on how the criteria were graded to support and/or dismiss compatible sites. Specifically there is a lack of information on the evaluation of alternative site, 11A Hopkins 11th Ave West, which was the runner-up site.

The following points outline our objections.

1. OMF Site Selection Evaluation: Failure to Identify Reasons for Selection of Site 9A

The SDEIS does not adequately address the rationale for selecting the proposed 9A site over a compatible alternative neighboring site, 11A, 11th Ave West. We request that the SDEIS provide more detail on the selection of its preferred site per our notes below.

Site 9A was not part of the original DEIS review and thus did not receive the full studies that were associated with the DEIS. In fact the DEIS recommended four other sites for the location of an OMF, all of them outside the city of Hopkins. The four other sites included three in Eden Prairie and one in Minneapolis. Although early in the process four sites were considered in Hopkins they were all dismissed during the review process. We understand that a more centralized location was identified as a reason for selecting a site in Hopkins in the SDEIS, however we feel not enough information was provided on the selection process.

As part of the SDEIS analysis for a preferred OMF site the Met Council used a four step process. Through that process approximately 30 sites were initially identified and subsequent steps dismissed potential sites. The four steps were as follows:

- First Step—preliminary site evaluation, 30 initial sites were reduced to 18 sites
- Second Step—detailed assessment based on 13 criteria—18 sites were reduced to 7 sites
- Third Step—an operational analysis and public jurisdictional review—7 sites were reduced to, the recommended 9A site and 11th Ave site 11A.
- Fourth Step final selection—detailed assessment and public jurisdictional review

Site 11A, K-Tel at 11th Ave., was a top candidate throughout the process. During the second step evaluation, assessed on 13 criteria as listed on table F.4-2, site 11A had a better rating than 9A. The K-Tel at 11th Ave site received seven (7) Excellent ratings compared to 5 received by site 9A, K-Tel East. Site 11A also received three (3) Very Good rating, two (2) Good ratings and a marginal rating for cost. The cost difference between the two sites was marginal as the 11A site had a cost range of 40-45 million while the 9A site was 35 to 40 million, thus having overlapping cost estimates.

In the Third Step Evaluation site 11A received better scores in alignment location and was even in all other categories except for the cost, as noted above. In regards to cost, the SDEIS does not identify the costs associated with the two sites. With critical budget constraints being currently discussed this part of the analysis should be further reviewed. This is especially true since it is apparent that the likely costs of acquisition from Stuart Companies are substantially understated.

The reasons cited in Appendix F, Table 4.3 (attached) for selecting site 9A apply equally to site 11A, but were not credited to 11A:

- Consistent with land and zoning
- Operate relief access/station proximity favorable
- Freight Rail and LRT alignment buffer along property borders
- Redevelopment potential of remnant area

While the rationales cited in Table 4.3 for dismissing 11A included "Nine Mile Creek crossing the site"; known site contamination; and potential development impact on Shady Oak Station, it is apparent, however, that these same arguments should apply to dismiss site 9A. This failure to apply identical physical criteria equally suggests an arbitrary and defective evaluation process. Also site 9A has significant additional environmental problems: the K-Tel East site (Site 9A) requires the filling of wetland and of floodplain and is adjacent to a capped sanitary land fill, which is being monitored for methane. The report does not identify if there are known site contaminations on site 9A, but does note that all industrial sites are subject to contamination and must go through a Phase II analysis. And as far as potential development impact to the Shady Oak Station, moving the OMF to site 11A would support the potential growth around the station. By

contrast, the SDEIS notes that the proposed OMF will adversely impact the potential development opportunity around the Shady Oak Station under the long-term impact section of the SDEIS.

In conclusion, the site selection process appears arbitrary and incomplete. We recommend that additional information be obtained and analyzed to demonstrate why site 9A was selected over site 11A.

2. Environmental Resources Which the SDEIS Did Not Consider in the 9A Site Selection

The SDEIS concluded that sixteen (16) environmental resource categories not be reviewed. We believe that since this is a new OMF location that was not reviewed in the previous DEIS it is imperative that all resource categories should be considered. Determination not to review an environmental resource was based on whether there would likely be new substantial environmental impacts for a particular resource category. The sixteen (16) categories dismissed by the SDEIS are as follows:

- | | |
|--------------------------------------|---|
| • Social Economics* | Noise |
| • Neighborhood and Communities | Parklands, Recreational Areas, and Open Space |
| • Cultural Resources | Vibration |
| • Visual Quality and Aesthetics | Electromagnetic Interference and Utilities* |
| • Biota and Habitat | Energy and Climate Change* |
| • Threatened and Endangered Species* | Transit |
| • Farmlands* | Freight Rail* |
| • Air Quality | Bicycle and Pedestrian |

We agree that a few of the categories need not be investigated as they do not exist at or near the site and are a non-factor to the review; they are highlighted by an asterisk above. However the remaining categories should be considered and reviewed. An Operations and Maintenance Facility brings with it many environmental impacts to the surrounding area, especially when operating 24 hours a day, 7 days a week, and 365 days a year. The site is proximate to numerous residences (including those of Stuart Companies), an extensive and environmentally sensitive wetland and a closed sanitary landfill. With trains continuously entering the OMF facility through the network of switching rails and being routinely serviced at the OMF, the community surrounding the facility as well as the physical environment will be adversely impacted by its operations.

The categories associated with Neighborhood and Communities, Air Quality and Pedestrian Interference will be negatively impacted by the 24-7, 365 days a year operation of a rail facility. The lights, noise and activity of the OMF will be a change to the neighborhoods and a potential impact to the landfill.

The categories associated with Cultural Resources, Visual Quality, Habitat and Open Space are all negatively impacted by the location of the OMF adjacent a large wetland basin and the park like qualities associated with the surrounding residences.

One key example of an environmental resource being improperly dismissed is the noise category. No further testing is identified for the proposed OMF site even though critically sensitive residential properties (including Stuart Companies' development) are proximate to that site. This omission is a major failing for a study of this kind.

Stuart Companies has engaged ESI Engineering to provide further review of the SDEIS with regarding to its analysis (or lack of analysis) of noise.

3. Risk of Environmental Releases at Site 9A

In its review of the environmental resources categories that were studied the SDEIS raised potential concerns with groundwater contamination resulting from hazardous material releases. With four known hazardous sites at site 9A and several potential hazardous sites the possibility of groundwater contamination near residential homes is concerning.

This is compounded by the fact that a capped landfill is adjacent the site and presents a risk of a release which would contaminate groundwater if disturbed by vibration resulting from construction or the constant running of trains immediately adjacent to the landfill.

We believe a more in-depth study is necessary that shows how the landfill may be protected from potential groundwater impacts and identifies the mitigation steps that will be taken if the landfill releases methane or other contaminants as a result of the construction of the OMF or vibration of the trains utilizing the facility and rails.

Sincerely



Tom Goodrum
Senior Planner
Westwood Professional Services

RECEIVED
JUL 20 2015
BY: *SPD*



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

1000 West 80th Street • Minneapolis, MN 55420

From: [Steven Goldsmith](#)
To: [swlrt](#)
Subject: Comment on SWLRT SDEIS
Date: Tuesday, July 21, 2015 3:32:05 PM

I fully endorse the comments submitted by LRT DONE RIGHT

There are many very serious matters raised in the SDEIS. To really address them will be complicated and very expensive. The project is already over budget and the proposed cuts to reduce cost also reduce value and may fatally compromise ridership/cost estimates. You will do the ultimate success of this project grave and likely fatal harm by submitting it to the fTA before all key feasibility issues are resolved and the final true costs of running the line partially at grade with co- located freight are known.

Sent from my iPad

From: [CIDNA Neighborhood](#)
To: [swlrt](#)
Cc: [Craig Westgate](#); [Ginis. Sophia](#)
Subject: Comments for Southwest LRT Supplemental Draft EIS
Date: Tuesday, July 21, 2015 4:44:22 PM
Attachments: [CIDNA SDEIS.pdf](#)

Hello,

The Cedar Isles Dean Neighborhood Association (CIDNA) Board of Directors approved the attached comments in response to the Southwest LRT Supplemental Draft Environmental Impact Statement on July 21, 2015.

Thank you,

Monica Smith
Coordinator
CIDNA
612-821-0131
info@cidna.org



Cedar Isles Dean Neighborhood Association (CIDNA) Comments for the Southwest LRT Supplemental Draft Environmental Impact Statement

The CIDNA Board of Directors approved the following comments in response to the Southwest LRT Supplemental Draft Environmental Impact Statement on July 21, 2015.

3.4.1.2 Acquisitions and Displacements

B. Potential Acquisitions and Displacements Impacts

This section identifies the potential long-term and short-term impacts that would result from the need to acquire land to implement the LPA in the St. Louis Park/Minneapolis Segment. The numbers of parcels that would need to be acquired and the potential for relocation of existing businesses are discussed in this section.

Long-Term Direct and Indirect Acquisitions and Displacements Impacts This section addresses how businesses and other land uses could be affected by the proposed LPA in the long term. Implementation of the LPA in the St. Louis Park/Minneapolis Segment would result in full acquisition of 23 parcels and partial acquisition of 29 parcels, including those with industrial, commercial, railroad, and residential land uses, as summarized in Table 3.4-3 and illustrated on Exhibit 3.4-1. All potential acquisitions within the segment will be within the cities of St. Louis Park and Minneapolis. The full acquisition of the 11 parcels with industrial and commercial uses could potentially result in the relocation of up to nine businesses that currently operate on or use these parcels. The acquisition of three parcels owned by a construction company and used for storage could result in the displacement of that business if the storage area needs to be in close proximity to the company's operation that is not affected by acquisition. Depending on the preferences of the owner, the project would work to relocate displaced businesses. A combined total of approximately one acre of land would be acquired from a total of seven residential parcels occupied by multiple condominiums and apartments, and would result in no displacements or relocations.

We request more information about 3400 Cedar Lake Parkway. On the Hennepin County property tax website, this parkland is listed as being owned by the Minneapolis Park and Recreation Board. What evidence does the Council have that it is owned by BNSF railroad? This ownership question is of critical importance in the analysis of compliance with federal Section 106 and 4(f) laws. Also, how does the Council determine a fair acquisition price to pay a private railroad company for a property that is indicated in public records as being owned by a public entity?

In Short-Term Acquisition and Displacement Impacts, the Council states that “[s]hort-term occupancies of parcels for construction would...change existing land uses” including “potential increases in noise

levels, dust traffic congestion, visual changes, and increased difficulty accessing residential, commercial and other uses.” The Council should say what the plans are to mitigate these effects for residents and businesses. Most important, how will prompt emergency fire, medical and police access be maintained?

In Short-Term Acquisition and Displacement Impacts, the Council discusses plans for remnant parcels without acknowledging its commitment with the City of Minneapolis in the Memorandum of Understanding. The MOU documents the Council’s agreement to convey property they own or acquire from BNSF or HCRRA in the Kenilworth Corridor that is not needed for the Project or freight rail to the Minneapolis Park and Recreation Board for use as parkland. Please see:

<http://metro council.org/METC/files/f7/f7d41cfb-a062-46c7-942d-0785989da8a0.pdf>

Using figures listed on the Hennepin County property tax website, annual property taxes payable just for the St. Louis Park properties listed as potential FULL parcel acquisitions in Table 3.4-3 total approximately [\$240,000] but Section 3.4.3, Economic Effects, states that the annual reduction in property tax revenue to the City of St. Louis Park for all full AND partial acquisitions is only \$35,940. The SDEIS lists plans for partial acquisition of properties owned by Calhoun Towers, Calhoun Isles Condo Assn and Cedar Lake Shores Townhomes and other private property in Minneapolis but no property tax loss is listed for Minneapolis. The Council should explain its calculations that the property tax losses are that low or nonexistent. Although we anticipate that the Council will not release dollar figures for specific property acquisitions, how can the public be assured that the Council is minimizing the cost of acquiring these properties, which will be borne by taxpayers as part of the Project cost?

3.4.1.3 Cultural Resources

B. Potential Cultural Resources Impacts

This section identifies the potential long-term and short-term impacts to the archaeological and architecture/history resources listed in or eligible for the NRHP.

Long-Term Direct and Indirect Cultural Resources Impacts.

This section describes long-term direct and indirect impacts on cultural resources within the segment’s APEs. Tables 3.4-4 and 3.4-5 provide preliminary determinations of effect that the LPA could have on the architecture/history and archaeological resources in the St. Louis Park/Minneapolis Segment and, identifies areas for continued consultation. Long-term direct and indirect effects include changes to historic properties and their settings, including visual effects, resulting from the construction of the project and new development and redevelopment around transit stations. Long-term indirect effects include noise effects and changes in traffic and parking patterns associated with operation of the project, as well as new development and redevelopment around transit stations. Final determinations of effects (i.e., whether they would be adverse or not) will be made by FTA, in consultation with MnDOT CRU, MnSHPO, and other consulting parties, in the forthcoming Final EIS.

Minneapolis residents have continually expressed concern with the impact the project will have, both during construction and after operation of SWLRT, on cultural resources in the City.

As stated by the Minnesota State Historic Preservation Office, an adverse effect on one contributing feature is an adverse effect on an entire historic district. Therefore, the conclusion that the project will

have an adverse effect on the Lagoon means that there will be an adverse effect on the Grand Rounds Historic District as a whole, as indicated in the SDEIS.

Section 3.1.2.3 of the SDEIS lists possible mitigation measures that may be included in the Section 106 agreement:

- Consultation with MNSHPO and other consulting parties during the development of project design and engineering activities for locations within and/or near historic properties
- Integration of information about historic properties into station area planning efforts
- Recovering data from eligible archaeological properties before construction
- Consultation with MNSHPO and other consulting parties during construction to minimize impacts on historic properties
- Preparation of NRHP nominations to facilitate preservation of historic properties
- Public education about historic properties in the project area

These items will not avoid, minimize or mitigate the long term adverse effects of the project on the Grand Rounds Historic District in a meaningful way. The noise impacts, including bells and horns, will be audible from distances within and beyond the Area of Potential Effect, and include not only the Lagoon area but also Lake of the Isles and Cedar Lake as well as the other parts of the Grand Rounds Historic District. Noise and vibration impact studies should be done from a baseline assuming no freight, as HCRRA had committed to do and as was contemplated in the DEIS. Despite the requirement that such impacts be minimized, co-locating both freight and light rail in the Kenilworth Corridor results in the opposite outcome.

The bridges over the Lagoon will have an adverse impact because of their the size and scale, inconsistency with the historic cultural landscape of the channel, the noise and vibrations caused by the light rail vehicles traveling the bridge and the fact that it may not be possible to mitigate the impacts of the new bridges, as stated by the MPRB earlier in the 106 process. The appearance of the new bridge structures and the sounds associated with modern rail infrastructure will alter the characteristics of “community planning and development,” “entertainment and recreation,” and “landscape architecture” that make the Lagoon eligible for NRHP designation, and will adversely affect the character and feeling of the Lagoon and how people use the historic resource, including the experience of using the waterway under the new structures. Given that the Council is proceeding with this project in spite of this adverse effect, we hope that designers will continue to be vigilant about minimizing the impact on the setting and feeling of the historic channel, including audible and visual intrusions that will alter the park-like setting of the Lagoon, a vital element of its historic character. These concerns extend to Cedar Lake and the beaches on it nearest to SWLRT, as well as the visual impact on Park Board Bridge #4, Lake of the Isles, Lake of the Isles Parkway and Lake of the Isles Historic District.

Table 3.4-5 lists cultural resources that have been preliminarily considered to have no adverse effect from the Project, because of continued consultation and avoidance/minimization/mitigation measures to be identified. The possible mitigation measures listed above would also not significantly address impacts on the cultural resources listed in this table. The Council must be responsible for ensuring that “continued consultation” is meaningful by conducting assessments and proposing specific mitigation solutions before the 106 agreement is written and finalized, as it is impossible to avoid adverse effects after SWLRT construction and operations commence.

Cultural resources covered in table 3.4-5 include Lake of the Isles Residential Historic District, Kenwood Parkway Residential Historic District, Lake Calhoun, Cedar Lake Parkway, Cedar Lake, Park Bridge #4, Lake of the Isles Parkway, Lake of the Isles, Kenwood Parkway, Kenwood Park, Kenwood Water Tower and four NRHP listed or eligible homes in the Area of Potential Effect. Station activity will change

traffic and parking patterns in the neighborhood and introduce long-term visual and audible intrusions that adversely impact these historic resources. Concerns about the long term Project impact on some or all of these cultural resources include the following:

- Long-term visual and audible intrusion from changes in traffic patterns related to station access: We are concerned that auditory impacts and changes in traffic and parking patterns will adversely affect the integrity of setting and feeling that make Kenwood Park, Kenwood Parkway, Lake of the Isles Parkway, Cedar Lake Parkway and the related residential historic districts, and the four individual homes listed on or eligible for the NRHP. A traffic analysis must be conducted and a plan to mitigate adverse impacts proposed and discussed before the 106 agreement is drafted.
- Noise effects from LRT operations: Audible intrusion from train operations, including bells and horns and the impact of trains going in and out of the tunnel, will alter the environment of the historic resources and the characteristics that make certain of these resources eligible for the NRHP. It seems unlikely that a few homes in the Kenwood Parkway Residential Historic District are the only cultural resources that will be adversely affected by noise from train operations.
- Infrastructure surrounding the tunnel and the massive tunnel portals could adversely affect the historic integrity of the resources. Signage along the historic parkways could also have an adverse effect. Specific design elements should be proposed to minimize these impacts and should be reviewed as part of the 106 process.

The degree of concern regarding the short term impact of SWLRT construction on all of these cultural resources cannot be overstated. Noise and vibration sensitive resources need to be identified. The public needs to see a comprehensive noise and vibration study and analysis for the Project during construction including the impact of increased truck and construction equipment traffic. We would like details on what will be included in the “project wide construction plan.” It should identify measures to be taken during construction to protect all historic properties from project-related activity including construction related traffic. We need to ensure that plans are in place to prevent or repair damage resulting project activities, incorporating guidance offered by the National Park Service in Preservation Tech Note #3: Protecting a Historic Structure during Adjacent Construction as well as an agreement that specifies how these potential impacts will be monitored. The Council previously communicated to a neighborhood group whose residents experienced damage from a Council project that “[c]ontinuing with future projects, our goal is to ensure that claims are promptly and appropriately investigated to determine whether or not they may be related to the project. Depending on the facts of the claim, this may involve independent experts.” We request that the Council communicate with owners of historic homes in the APE prior to construction.

The SDEIS also lists “station area development” as an item to be addressed through continued consultation. Numerous statements have been made that development is not anticipated at the 21st Street Station. For example, the Southwest Community Works website and documents state: “Future development is not envisioned around this station...”

<http://www.swlrtccommunityworks.org/explore-corridor/stations/21st-street-station>

The discussion of development potential at the Penn Station does not relate to the Kenwood Parkway side:

<http://www.swlrtccommunityworks.org/~media/SW%20Corridor/Document%20Archive/investment-framework/ch-4-penn.pdf>

The Council must explain what development is being referred to in Table 3.4-5.

3.4.1.4 Source: MnDOT CRU, 2014.Parklands, Recreation Areas, and Open Spaces

This section identifies parklands, recreation areas, and open spaces in the St. Louis Park/Minneapolis Segment, along with potential long-term direct and indirect, and short-term impacts that would occur as a result of the LPA. Some potential effects of the LPA on parklands, recreation areas, and open spaces in the segment have changed since publication of the Draft EIS; these are also identified and addressed in this section. As summarized in Table 3.4-1, there would be no long-term direct impacts (defined as the permanent incorporation of parklands, recreation areas, or open spaces into the project) from the LPA on parklands, recreation areas, and open spaces in the segment. Long-term indirect and short-term temporary construction impacts (i.e., visual, noise, and access) from the LPA would occur at four parks that would be directly adjacent to the proposed light rail extension.

Long-Term Direct and Indirect Parklands, Recreation Areas, and Open Spaces Impacts

We request more information about 3400 Cedar Lake Parkway. This parkland has long been listed as Minneapolis Park and Recreation Board property on the Hennepin County property tax website. What evidence does the Council have that it is owned by BNSF railroad? Does the conclusion of no long-term direct impact of the Project on Cedar Lake Park depend on the Met Council taking advantage of a loophole: that documentation conveying this Cedar Lake Park property to the Park Board many years ago may be lacking, even though the intent that it be parkland was understood?

The SDEIS states: “None of the indirect impacts on parklands, recreation areas, and open spaces from the LPA in the St. Louis Park/Minneapolis Segment would substantially impair the recreational activities, features, or attributes of those parklands, recreation areas, and open spaces.” We dispute this conclusion. The permanent installation of freight rail and light rail in the Kenilworth Corridor that is too narrow to permit separation in accordance with AREMA and FTA guidelines creates a safety risk that would directly impair park activities in the event of a derailment and/or explosion of flammable materials.

For comment on the indirect impacts of the LPA in the form of visual, noise, and/or access impacts, please see comments to sections 3.4.1.5, 3.4.2.3, and 3.4.4.4 of this Supplemental Draft EIS.

Short-Term Parklands, Recreation Areas, and Open Spaces Impacts

This section describes the potential short-term impacts to parklands, recreation areas, and open spaces that would occur during construction of the LPA.

Construction activities could result in short-term indirect impacts to parklands, recreation areas, and open spaces that would be located directly adjacent to the project’s construction zones (i.e., Jorvig Park, Lilac Park, Park Siding Park, Cedar Lake Park, and Lake of the Isles Park). These short-term indirect impacts could include temporary generation of dust, noise, and increased truck traffic (see Sections 4.6.5 and 4.6.6 of the Draft EIS for further information on short-term air quality impacts and mitigation measures; and see Section 3.4.2.3 of this Supplemental Draft EIS for additional information on short-term noise impacts and mitigation measures, including noise generated by increased truck traffic). These impacts would be of short duration and will be minimized through the implementation of standard related construction BMPs, such as dust control, erosion control, and proper mufflers.

Please specify the extent to which the stated “standard” measures would be sufficient to protect this environmentally sensitive parkland.

During construction, how can the safety of park and trail users (Park Siding Park, Cedar Lake Park, Lake of the Isles Park, and nearby trails and lakes) be assured, given that unit freight trains of 100 or more cars containing Class III flammable liquids, especially ethanol, travel through this narrow corridor in close proximity to a construction pit and materials, without whatever protective walls will later be installed?

Section 3.4.1.5 Visual Quality and Aesthetics

Excerpt from City of Minneapolis RESOLUTION 2010R-008 by Colvin Roy:

Be It Further Resolved that the current environmental quality, natural conditions, wildlife, urban forest, and the walking and biking paths be preserved and protected during construction and operation of the proposed Southwest LRT line.

Be It Further Resolved that any negative impacts to the parks and park-like surrounding areas resulting from the Southwest LRT line are minimized and that access to Cedar Lake Park, Cedar Lake Regional Trail, Kenilworth Trail and the Midtown Greenway is retained.

While we appreciate and agree that the visual impact from Viewpoints 2, 3, and 4 are recognized as being substantial, we strongly disagree and contest the idea that the level of visual impact north of the Kenilworth Channel crossing (including Viewpoints 5 and 6) will be “not substantial.” (pages 3-167, 168). The negative visual impact of SWLRT in the Kenilworth Corridor, especially with freight rail remaining (contrary to all previous planning), will be substantial throughout the corridor.

Throughout this area, the SWLRT project will remove a large amount of green space and trees, and replace them with an overhead catenary system, tracks and ballast. The park-like environment will be permanently degraded by this infrastructure, as well as by the approximately 220 daily trains traveling over the historic Kenilworth Lagoon and through the corridor.

Clearly, the degree of change in the visual resource will be great, and, with well over 600,000 annual visitors to the Kenilworth Trail, the exposure to viewers will be high. Over the past 7 to 10 years, neighbors and trail users have clearly expressed to Hennepin County and the Met Council the very high value they place on the green space, wildlife and bird habitat, trees and other vegetation in the Kenilworth Corridor.

The visual impact to the park-like environment is exacerbated by the continuing presence of freight rail, which was expected to be removed from the Kenilworth corridor at the time of the Alternatives Analysis, the Locally Preferred Alternative decision, and the 2012 DEIS.

It appears that the consultant determining the visual qualities of the corridor relied entirely on Google Earth, files of the revised project layout, and selected “photographically documented” views (Appendix J,

section 2B). If this is true, it is very discouraging that the area was not visited in person by the evaluator, nor were any stakeholders consulted.

At **Viewpoint 5**, we support all efforts to create an “attractive design” for the bridges crossing the Kenilworth Channel. The three new bridges will certainly become a “focal point,” adding large cement structures and heavily impacting the setting and feeling of this element of the Historic Chain of Lakes and the Kenilworth Trail. An attractive design for these bridges does not compensate for the vegetative clearing. The character of the City of Lakes’ signature canoe, kayak and skiing route from Lake of the Isles through the Kenilworth Channel to Cedar Lake will be fundamentally and permanently degraded. There will be a substantial negative visual impact from the level of the water as well as the level of the trail.

At **Viewpoint 6**, the SWLRT project plans to remove a significant amount of vegetation along the edge of Cedar Lake Park, as well as trees, plants, and restored prairie currently along the bicycle and pedestrian trails. The claim that removing trees and replacing them with overhead power lines would create a positive visual experience for trail users (“open up the view, making it more expansive”) is absurd on its face and contradicts the clearly expressed will of the Minneapolis City Council and the adjacent neighborhood. The 21st Street Station – a slab of concrete and metal with fencing and catenaries – will certainly “create a focal point,” but it is not credible to assert that this will positively impact the visual qualities of a place that is now adjacent to an urban forest and is itself in a “park-like environment.”

The negative visual impact of SWLRT in the Kenilworth Corridor, especially with freight rail remaining (contrary to all previous planning), will be substantial throughout the corridor. **We assert that the Council must recognize this and identify robust and meaningful mitigation measures for incorporation into the project.**

3.4.2.1, 3.4.2.2 Geology and Groundwater, Water Resources

The Section 404 permit application will identify compensatory mitigation for unavoidable impacts to wetlands and other aquatic resources. A Compensatory Mitigation Plan will be developed by the Council, and reviewed by USACE, prior to the submittal of the Section 404 permit application.

CIDNA demands that there be a much more significant and transparent discussion regarding the compensatory mitigation for damage to wetlands and aquatic resources in the Minneapolis segment, especially the Kenilworth Channel and Cedar Lake. While a permit application is required, the SDEIS identifies that there will be damage done to aquatic resources but does not specify the level of damage done during construction and then during operation of the line. The further impairment of these resources is a direct violation of the EPA Clean Water Act and will degrade one of the crown jewels of the Minneapolis “City of Lakes” water resources. Residents swim, paddle, and recreate in those resources, and to callously suggest that a section 404 permit will just address those concerns is alarming. Further, CIDNA is not convinced that sufficient analysis has been done on existing contamination in the Kenilworth Corridor. Southwest Project Office has already stated that additional contamination is

likely to be found, and while the additional contamination is stated to be covered by the contingency fund, CIDNA finds this approach to be irresponsible budgeting without fully knowing what contamination exists and if enough is actually budgeted in the fund. The Kenilworth Corridor north of 21st St is a former rail yard that housed up to 58 rail lines during its peak, and was in service for decades. The SDEIS itself specifies the numerous toxic contamination in such soil due to its former use. CIDNA strongly opposes disturbing the land and releasing contamination into the water and air.

Southwest LRT Supplemental Draft EIS - Supporting Documents and Technical Reports: SWLRT Kenilworth Shallow LRT Tunnel Basis of Design Technical Report (Met Council, 2014d):

An Existing Sewer Force Main Crosses the Proposed Location of the SWLRT South Tunnel in the Kenilworth Corridor. The removal and relocation of recently installed dual force mains, running beneath the freight tracks and Kenilworth Trail (between Depot Street and W. 28th Street) at the site of the proposed south tunnel, will be necessary to accommodate co-location of LRT with freight in the Kenilworth Corridor. The presence of the existing dual sewer force mains has design and construction implications on the shallow tunnel, which have not been addressed in the SDEIS. The SDEIS technical drawings for the shallow tunnel do not indicate the existing force sewer main or the sewer relocation plan. Although Metropolitan Council has indicated replacing 200' of the dual 18" sanitary sewer force mains at Depot Street in its 9/19/14 CTIB capital grant application, the design impacts and costs associated with relocating the force main are not appropriately addressed in the SDEIS or identified in the Kenilworth Shallow Tunnel Design Technical Report.

In 2013 the Metropolitan Council Environmental Services (MCES) installed replacement sewer force mains between France Avenue and Dean Parkway. The force mains follow Sunset Boulevard to Depot Street and then cross under active freight railroad tracks and the Kenilworth Trail to West 28th Street. The force mains installation at this location was completed by tunneling under, and placed perpendicular to, the railroad tracks and Kenilworth Trail so as not to disrupt active rail operations. The tunneling process required construction of two tunneling (jacking) pits on either side of the tracks. One pit was located at Depot Street and the other was located at the end of West 28th Street adjacent to Park Siding Park. The tunneling pit near Park Siding Park measured 16 by 34 feet and was approximately 27 feet deep. The excavation of these pits required the use of a crane and an excavator.

The SWLRT south tunnel construction plan indicates a pit to be dug to a depth of approximately 35 feet in this same location. The existing force main crossing consists of a 60-inch diameter tunneled steel "casing" pipe. The depth to the top of the casing pipe is approximately 17 feet and the bottom depth is 22 feet. The dual 18-inch force main pipes pass through this tunneled casing. The current placement of the force main interferes with the proposed location of the tunnel construction pit. The force main will need to be removed and relocated either above the proposed tunnel or below the tunnel to a depth greater than approximately 45 feet below ground level. See diagrams A through C below. If the force main is relocated above the shallow tunnel, the tunnel will need to be dug deeper in order to accommodate the force main above. This will result in an increased steepness in the incline of descent and ascent of the entrance and exit to the tunnel respectively. If LRT trains cannot navigate said increased grade change

then it may require building a longer tunnel in order to safely allow trains to exit and enter at a lesser incline/decline, adding to the cost and impact.

Risks associated with possible stray electrical current traveling in the ground from the LRT power lines to the sewer force mains have not been identified or addressed in the SDEIS.

The removal and re-installation of the dual force mains will have Economic, Social, and Environmental impacts.

Economic:

Cost:

Long term impact - Increase in cost of the SWLRT project of an undetermined amount as a result of co-locating freight and LRT, including:

1. Cost of removing and relocating the sewer force main located under the freight tracks and the Kenilworth Trail.
2. Cost of possible redesign of the south tunnel to accommodate force main relocation if it is reinstalled above the south tunnel.
3. Costs associated with re-engineering or lift station(s) that may be required to ensure adequate force is maintained in the sewer main if the main is re-located to a deeper position (i.e., from approximately 22 feet to more than 45 feet below ground level).
4. Cost of remediation of any portions of Park Siding Park that may be affected during removal/relocation of the force sewer main.
5. Cost of roadwork at Depot Street to remove/relocate force main.
6. Cost of damages to walls, ceilings and foundations of neighboring residences as a result of construction to remove/relocate the force sewer main.
7. Costs to remediate noise and vibrations impacts on the community that may be experienced during the construction period and post construction period should lift station(s) be required.

Social:

Parkland, Recreation, Open Spaces and Safety Impact:

Short term construction impact - Portions of Park Siding Park (a Section 4 (f) property) may again be affected in order to accommodate the removal and reinstallation of this force sewer main and construction of tunneling (jacking) pits. The original construction resulted in closure of the park to users for an extended period, installation of a temporary detour through the park to accommodate the closure of Dean Court, destruction of park vegetation, gardens and lighting, and the removal of playground equipment. Some of these same impacts may again occur during the removal/relocation of the force main and construction of associated jacking pits. In addition, the construction of the south tunnel is expected to take 2-3 years and requires a deep open pit adjacent to Park Siding Park. The access and enjoyment of this park will be affected by the tunnel construction during this extended time frame and presents a dangerous environment for nearby park users and freight rail operations. The mitigation and cost of remediation of the parkland have not been addressed in the SDEIS.

Environmental:

Noise:

Short term noise impacts - Removal and reinstallation of the force line will result in noise impacts of an undetermined level to both neighboring residents and Park Siding Park users as a result of both construction activities and construction vehicles. Mitigation plans/cost are not included in the SDEIS and need to be addressed.

Vibration :

Short term vibration impacts – Effects of construction activities and, to a lesser extent, construction vehicles will have an impact on park users, neighbors and their residences. Vibration and associated ground-borne noise impacts may damage walls, ceilings and foundations of nearby residences, as was experienced in the original construction of this force line. Mitigation plans/cost are not included in the SDEIS and need to be addressed.

Diagram A – Existing sewer force main at approximately 22 feet below grade obstructs planned location of SWLRT south tunnel in the Kenilworth Corridor, which requires an estimated 45 feet below ground level for construction pit and helical piles.

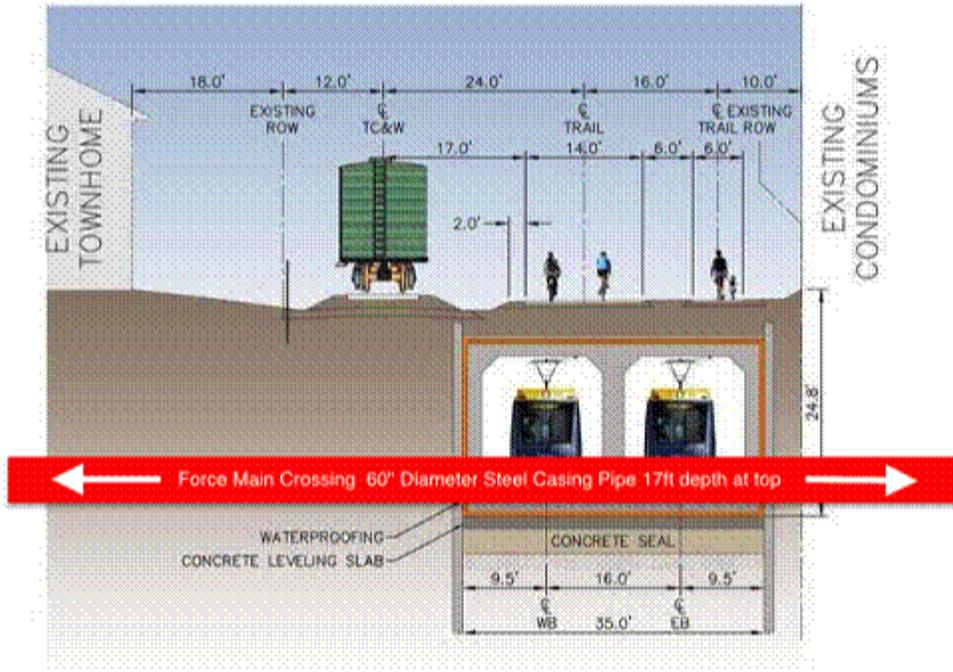


Diagram B – Typical Kenilworth Shallow LRT Tunnel Section per SDEIS

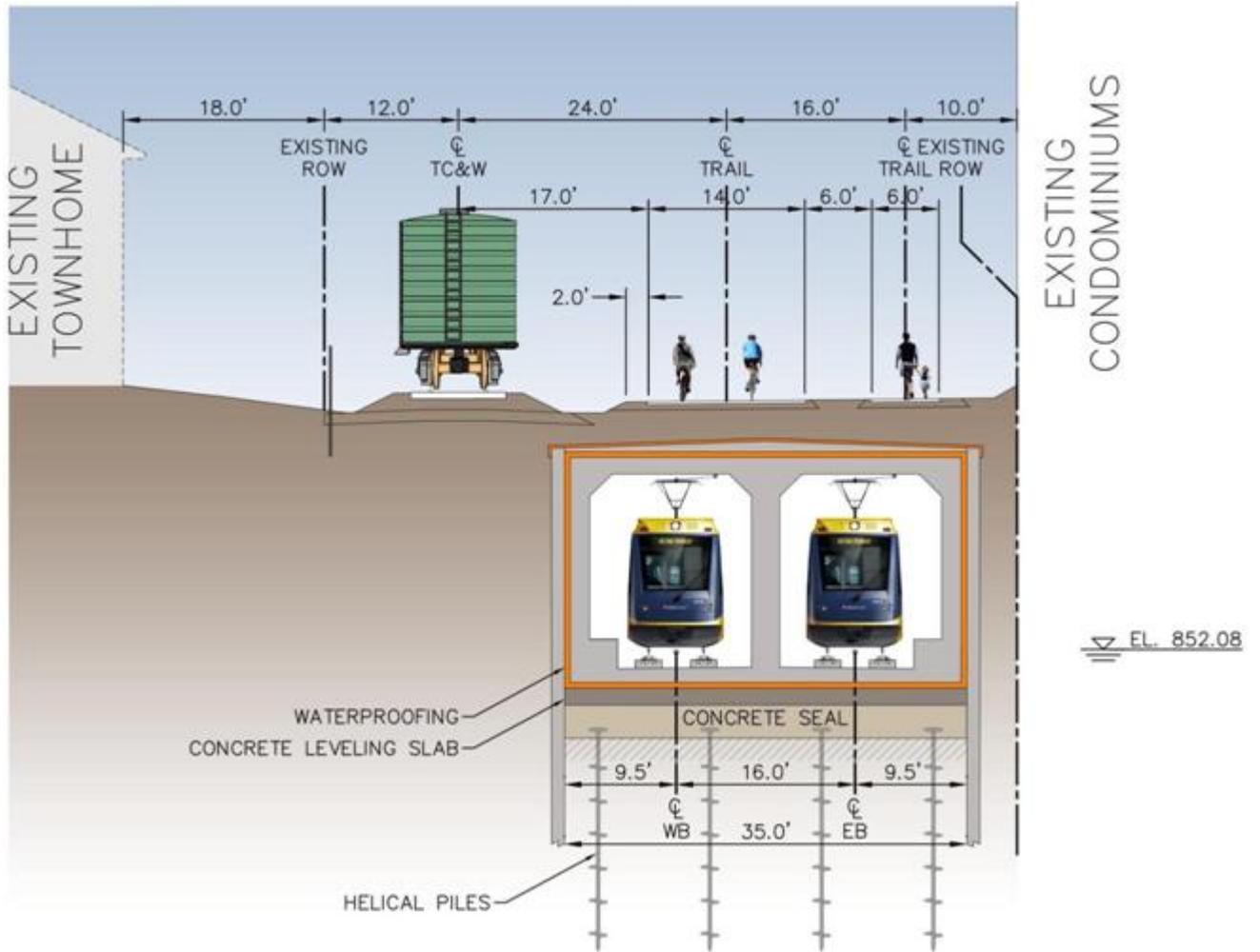
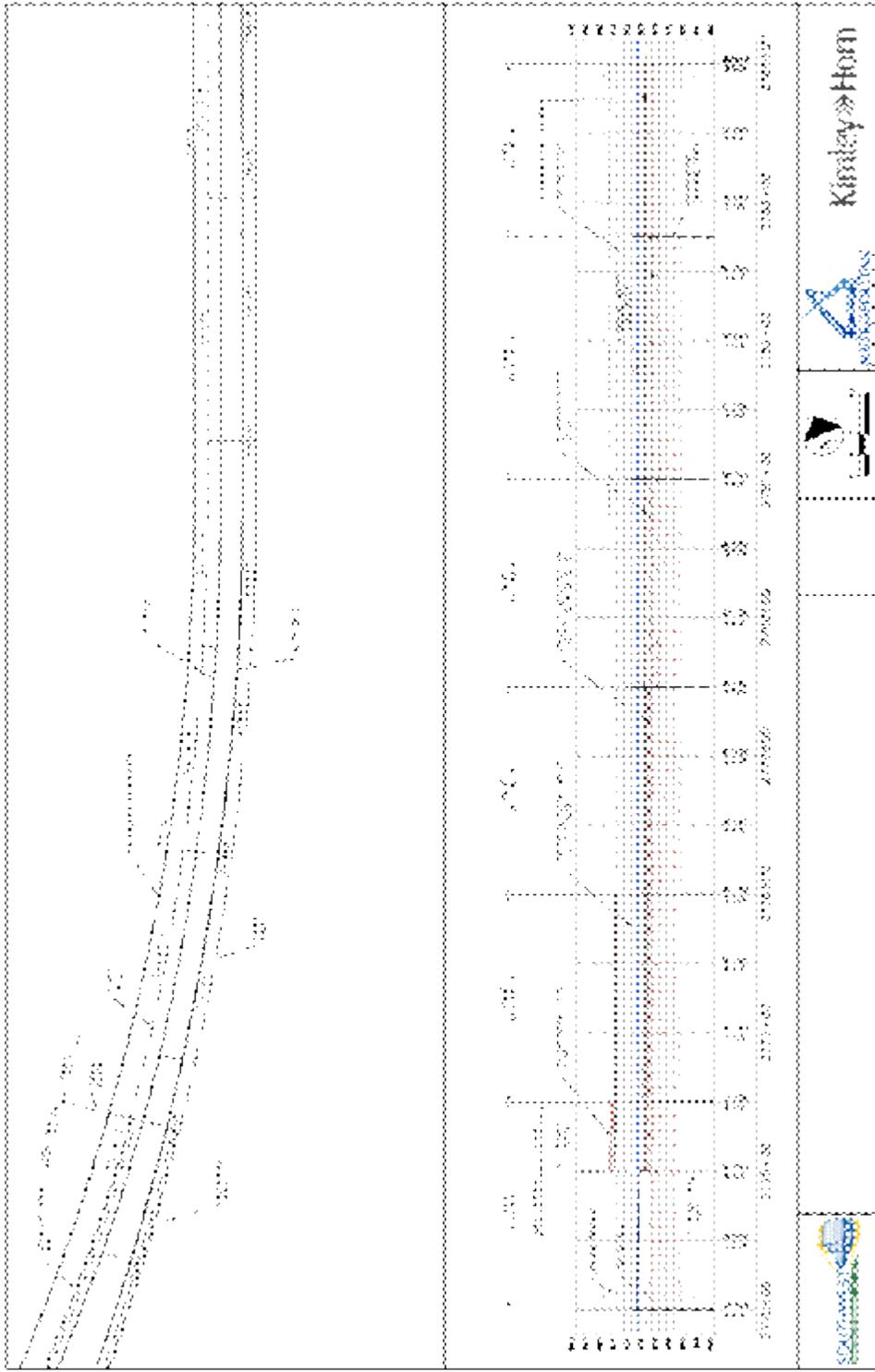


Diagram C - SWLRT South Tunnel Typical Cell Sequencing per SDEIS Note: the helical piles are shown at approximately 820 feet above sea level which is approximately 45 feet below the ground level.



3.4.2.3 and 3.4.2.3 Noise and Vibration

The SDEIS greatly understates both noise and vibration impacts of SWLRT.

- It uses wrong data as the fundamental framework for noise and vibration analyses. The sole purpose of this SDEIS is to assess the impact of changes made in the SWLRT plan since the 2012 DEIS; the baseline data used in this study should therefore have reflected that 2012 plan — which *did not include a freight train*. However, the SDEIS bases its noise and vibration data on a scenario that *does* include a freight train, thereby misleadingly minimizing the degree to which noise and vibration would be increased above what was indicated in the 2012 DEIS. Use of the wrong baseline data means that in this section the document fails to meet its goal of evaluating “the result of adjustments to the design of the Southwest LRT Project since the publication of the [Draft EIS](#) in 2012.”¹ ***This defect renders the noise and vibration sections of the SDEIS fundamentally flawed and misleading. They need to be reworked with appropriate and correct data.***
- The SDEIS estimates noise and vibration impacts from points that would not be the most severely impacted. The SDEIS does not measure impacts on residences closer than 45 feet from the SWLRT tracks, whereas the closest homes to the LRT tracks are only 31 feet away. The CIDNA-sponsored study by ESI Engineering raised this problem with respect to the 2012 DEIS, but it has not been reflected and incorporated into the SDEIS.
- The SDEIS effectively ignores the impacts of construction. See more below.

Noise 3.4.2.3

This section provides a summary of the existing noise levels around noise-sensitive properties with the St. Louis Park/Minneapolis Segment; an assessment of how those properties would be impacted by the LPA; and how those impacts will be mitigated. As summarized in Table 3.4-1, there would be 67 moderate noise impacts and three severe noise impacts without mitigation.

Background information on how noise is defined, the noise generated by LRT and freight rail, and FTA noise impact guidelines can be found in the Noise Fact Sheet in Appendix H of this Supplemental Draft EIS. Appendix H of the Draft EIS also contains background information on noise and FTA evaluation criteria. In addition, detailed information regarding noise measurements, impact methodology, and the impact assessment can be found in Appendix H of this Supplemental Draft EIS.

When the Met Council chose the present route for SWLRT between the Chain of Lakes through the Kenilworth Corridor, and included “co-location” which will make the existing freight rail permanent, the project implicitly accepted the responsibility to respect the natural and built environments that it travels through as well as the people who bike, walk, recreate, and live there. We believe that this responsibility has not been taken seriously and the following describes why.

¹ <http://metro council.org/swlrt/sdeis>

SWLRT noise impacts substantially minimized

We believe that the SDEIS substantially minimizes the noise impacts associated with the proposed SWLRT. The noise impact of SWLRT in this area of Minneapolis will be highly significant for a number of reasons, but most notably because of the tranquility, recreational, park, and residential use currently existing in and bordering the Corridor. This proposed SWLRT route is not comparable to the Blue Line (Hiawatha) and the Green Line (Central Corridor down University Avenue), which are immediately adjacent to commercial thoroughfares or four-lane roads that carry cars and heavy trucks around the clock. By contrast, the Kenilworth area is a quiet environment, and is part of the **Grand Rounds National Scenic Byway**.

A National Scenic Byway is a road recognized by the [United States Department of Transportation](#) for one or more of six "intrinsic qualities": archeological, cultural, historic, natural, recreational, and scenic. The program was established by Congress in 1991 to preserve and protect the nation's scenic but often less-traveled roads and promote [tourism](#) and economic development. The National Scenic Byways Program (NSBP) is administered by the [Federal Highway Administration](#) (FHWA).

The Kenilworth Corridor accommodates pedestrian and bike traffic, along with a slow moving freight train – two to five times per 24 hour period – which was intended to occupy the corridor only on a temporary basis.

Now let's take a look at how this reality is compatible with the LPA of the SWLRT:

The SDEIS coolly states that 24 residences would suffer Severe or Moderate noise impact; translated, this means the noise of 220 light-rail trains running daily from 4 a.m. to 2 a.m. would fundamentally transform the adjacent neighborhood with near-constant noise and vibration. As noted in Appendix H (SDEIS Noise and Vibrations Memoranda), residences are considered Category 2 buildings, with the expectation that sleep occurs there.

The noise levels given in Noise Fact Sheet (Appendix H p. 19) state the following: LRT trains traveling at 45 mph generate maximum typical noise levels of 76 dBA at 50 feet, 71 dBA at 100 feet, and 66 dBA at 200 feet. Adding 211-220 LRT 3 - car trains to the Kenilworth Corridor day and night, each producing such elevated noise levels, would be a severe and overwhelming intrusion, critically increasing the noise generated. This holds true even if the only noise increase resulted from the LRT trains traveling at their stated speed, per the SDEIS, of 45 mph. The conclusion of overwhelming intrusion is further evidenced by the analysis below combining LRT frequency, time of day or night of LRT, and LRT bell noise intensity and frequency found in Appendix H, SDEIS p.3-13 and p.3-18.

CIDNA's Analysis of SDEIS Appendix H Table 1 & p. H-4 Data

- Bells are sounded for 5 seconds prior to grade crossings, as vehicles approach grade crossings, such as the 21st Street in the Kenilworth Corridor
- Grade crossing bells are used at grade crossings for 20 seconds for each train - 21st Street is also a grade crossing.

- Bells are sounded twice at stations - 1x entering and 1x exiting station platforms, such as the 21st Station (SDEIS gives no duration). *
- Total bell time (not counting the brief pause between entering and exiting the station) is known or given as more than 25 seconds per train. It is unknown how much longer than 25 seconds the bells will sound, as exit/enter bell duration is not given in the SDEIS.

* We request the duration of bells sounding when entering and exiting station platforms be made public. This information is needed for accurate noise impacts to be known.

WEEKDAYS

Early morning 4:00 AM – 5:30 AM

- 6-8 trains per hour = 9-12 trains per day 4:00 AM – 5:30 AM
- 1 SWLRT train at 66-76 dBA every 7.5 – 10 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 7.5 – 10 minutes

Early morning to evening 5:30 AM – 9:00 PM

- 12 SWLRT trains per hour = 186 trains per day 5:30 AM – 9:00 PM
- 1 SWLRT train at every 5 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106A dBA + unspecified seconds of bell noise as train enters and exits the station) every 5 minutes.
- At least 10% of every 5 minute period in the Kenilworth Corridor will consist of 88dBA and 106 dBA bell noise
- At least 6 minutes of every hour from early morning to 9 PM in the Kenilworth Corridor will consist of 88dBA and 106 dBA bell noise

Evening to early morning 9 PM - 2 AM

9 PM – 11 PM

- 6-8 trains per hour = 12-16 trains per day 9 PM – 11 PM
- 1 SWLRT train at every 7.5 - 10 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 7.5 --10 minutes

11 PM – 12AM

- 2 trains per hour = 2 trains per day 11 PM – 12 AM
- 1 SWLRT train every 30 minutes
- 25 + seconds of bells ((5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 30 minutes

Very early morning 12 AM – 2 AM

- 1-2 trains per hour = 2-4 trains per day 12 AM – 2 AM
- 1 SWLRT train every 30– 60 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 30 – 60 minutes

Very early morning 2 AM – 4 AM

- 2 hours of no LRT trains = baseline, current noise levels

Total = 211-220 SWLRT 3-car trains per weekday

WEEKENDS

Early morning 4:30 AM – 9 AM

- 6-8 trains per hour = 26- 36 trains per day 4:30 AM – 9 AM
- 1 SWLRT train every 7.5 – 10 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 7.5 – 10 minutes

Morning to evening 9 AM – 7 PM

- 12 trains per hour = 120 trains per day 9 AM – 7 PM
- 1 SWLRT train every 5 minutes
- At least 25 seconds of bell noise (5 seconds 88 dBA + 20 seconds 106A dBA + unspecified seconds of bell noise as train enters and exits the station) every 5 minutes.
- At least 10% of every 5 minute period in the Kenilworth Corridor will consist of 88dBA and 106 dBA bell noise
- At least 6 minutes of every hour from early morning to evening in the Kenilworth Corridor will consist of 88dBA and 106 dBA bell noise

Evening 7 PM to 9 PM

- 8 trains per hour = 16 trains per day 7 PM – 9 PM
- 1 SWLRT train every 7.5 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 7.5 minutes

Late evening 9 PM – 11 PM

- 6 – 8 trains per hour = 12 – 16 trains per day 9 PM – 11 PM
- 1 SWLRT train every 7.5 – 10 minutes
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 7.5 -10 minutes

Late evening 11 PM – 12 AM

- 4 trains per hour = 4 trains per day 11 PM – 12 AM
- 1 SWLRT train every 15 minutes
- 11 PM – 12 AM weekend train frequency is double weekday frequency 11 AM – 12 AM
- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 15 minutes

Very early morning 12 AM – 2 AM

- 2-4 trains per hour = 4-8 trains per day 12 AM – 2 AM
- 1 SWLRT train every 15 – 30 minutes
- 12 AM – 2 AM the weekend train frequency is double weekday frequency 12 AM – 2 AM

- 25 + seconds of bell noise (5 seconds 88 dBA + 20 seconds 106 dBA + unspecified seconds of bell noise as train enters and exits the station) every 15 – 30 minutes

Very early morning 2 AM – 4 AM

- No trains = current existing conditions

Total = 180 -195 SWLRT 3- car trains every weekend day

The result of LRT noise is the corridor will be permanently changed from a quiet, tranquil area sought by pedestrians, cyclists, and outdoor enthusiasts, to a severely noise disrupted, highly mechanized transit route.

Beyond permanently degrading the area, there will be multiple public health consequences of SWLRT noise in the corridor. The impact of repetitive noise intrusion on neighborhood public health will be significant. For example, regarding the obvious potential for sleep interruption caused by SWLRT noise (and there will be more trains during the late evening and early morning weekend hours) a research review published in the December 2014 edition of *Sleep Science*, summarizes:

emerging evidence that these short-term effects of environmental noise, particularly when the exposure is nocturnal, may be followed by long-term adverse cardio metabolic outcomes.

Nocturnal environmental noise may be the most worrying form of noise pollution in terms of its health consequences because of its synergistic direct and indirect (through sleep disturbances acting as a mediator) influence on biological systems. Duration and quality of sleep should thus be regarded as risk factors or markers significantly influenced by the environment. One of the means that should be proposed is avoidance at all costs of sleep disruptions caused by environmental noise.”

The article goes on to review that:

The World Health Organization (WHO) has documented seven categories of adverse health and social effects of noise pollution, whether occupational, social or environmental. The latter [sleep disturbance] is considered the most deleterious non-auditory effect because of its impact on quality of life and daytime performance. Environmental noise, especially that caused by transportation means, is a growing problem in our modern cities. A number of cardiovascular risk factors and cardiovascular outcomes have been associated with disturbed sleep: coronary artery calcifications, atherogenic lipid profiles, atherosclerosis, obesity, type 2 diabetes, hypertension, cardiovascular events and increased mortality....during the past year, the relationship between insomnia and psychiatric disorders has come to be considered synergistic, including bi-directional causation.”²

In the area of mental health, there is growing evidence that the opportunity for ‘soft fascination’ experienced in greenspace supports social and psychological resources and recovery from stress.³ The perpetual and repetitive noise from SWLRT would interrupt the soft fascination currently experienced in the Kenilworth Corridor, nearby beaches, parks, the Kenilworth Channel and general environs of Lake of

² *Sleep Science*, Volume 7, Issue 4, December 2014, Pages 209-212).

³ *British Journal of Sports Medicine* 2012, “The Urban Brain: Analyzing Outdoor Physical Activity with Mobile EEG.”

the Isles and Cedar Lake. Opportunities for ‘soft fascination’, though often taken for granted by suburban dwellers, are extremely limited in urban areas, yet equally if not more critical for the mental health of urban residents.

With healthcare costs and disease prevention being prominent national and local priorities, the economic value of the public health benefit of the Chain of Lakes and Kenilworth Corridor cannot be simply ignored. Therefore, we request a study of the physical and mental health impacts of the noisy, hyper-mechanization of this currently placid area.

A. Existing Conditions (p. 3-180)

This section describes existing noise-sensitive land uses in the St. Louis Park/Minneapolis Segment and existing noise levels.

Fundamental defect with baseline noise measurements

The SDEIS uses wrong data as the fundamental framework for noise and vibration analyses. The sole purpose of this SDEIS is to assess the impact of changes made in the SWLRT plan since the 2012 DEIS; the baseline data used in this study should therefore have reflected that 2012 plan — which *did not include a freight train*. However, the SDEIS bases its noise and vibration data on a scenario that *does* include a freight train, thereby misleadingly minimizing the degree to which noise and vibration would be increased above what was indicated in the 2012 DEIS. Use of the wrong baseline data means that in this section the document fails to meet its goal of evaluating “the result of adjustments to the design of the Southwest LRT Project since the publication of the Draft EIS in 2012.”⁴ ***This defect renders the noise and vibration sections of the SDEIS fundamentally flawed and misleading. They need to be reworked with appropriate and correct data.***

The SDEIS estimates noise and vibration impacts from points that would not be the most severely impacted. The SDEIS does not measure impacts on residences closer than 45 feet from the SWLRT tracks, whereas the closest homes to the LRT tracks are only 31 feet away. The CIDNA-sponsored study by ESI Engineering raised this problem with respect to the 2012 DEIS, but it has not been reflected and incorporated into the SDEIS.

Further, since aircraft overflights are generally scarce, the average current noise level per hour is extremely low when averaged over a 24-hour period.

Additionally, there are significant seasonal and weather-related variations in noise levels, which cannot be captured when sound is measured during one 24-hour period in the summer.

Finally, in Appendix H, p.2, it is noted that “noise monitoring was performed at other locations not listed in the table. Those sites will either be addressed in the forthcoming Final EIS or no longer fall within the area where they would be potentially impacted by project noise due to design refinements during Project Development.” Since the purpose of the SDEIS is to inform the public and decision makers, and provide opportunity for comment on all areas of concern, in order to fulfill that NEPA mandate, all measurements there were made and publicly financed should be made public.

⁴ <http://metro council.org/swlrt/sdeis>

B. Potential Noise Impacts

This section identifies and evaluates the potential long-term and short-term noise impacts that would occur in the St. Louis Park/Minneapolis Section. The long-term noise impact evaluation considers the potential increase in noise levels for sensitive receptors closest to the proposed LRT stations and track as a result of operation of light rail and freight rail.

Noise Impacts Measurement Tables (Table 3.4-11, 3.4-12)

Following FTA noise assessment guidelines, the 76 dBA LRT noise every 5 minutes is measured as having a lower impact than actual dBA of 76 because the LRT noise is not continuous. Thus, though this quiet urban area will be exposed to an actual repetitive noise of 76-80 dBA day and night, the rating of the impact is lower and measured as 51 – 64 dBA in Tables 3.4-11, 3.4-12. The significantly lower measurement lessens the determination of findings of impacts, and therefore, whether impacts are determined as non-existent, moderate or severe. This engineering methodology covers up the actual impact on people of loud repetitive noise in a peaceful setting.

The 25 + seconds of repetitive bell noise described in the **CIDNA’s Analysis of SDEIS Appendix H Table 1 & p. H-4 Data** above does not appear to be included in the SDEIS noise analysis in Tables 3.4-11, 3.4-12, which would clearly increase the severity of noise impact at all locations. The SDEIS also neglects to report and measure the cumulative effect of LRT and freight train noise. This information would likely show that more than 24 residences would be affected; more of them would be impacted at the severe level, and a greater impact on the Kenilworth Channel and Kenilworth Lagoon Bank. Furthermore, future projected noise levels of LRT and freight will be higher than the projection inputs used by the SDEIS after the clear cutting of trees and vegetation in the corridor, increasing the impact of noise generated by both SWLRT and the freight rail. When utilizing the Source – Path – Receptor FTA noise impact assessment framework, it is clear that the inputs for each of the three parameters are critical and control the outcomes determining the severity of noise impact. Removal of the trees and vegetation eliminates a significant and well established noise barrier currently in the path of noise from freight and future SWLRT. The SDEIS does not address the impact of clear cutting the trees and vegetation in the Kenilworth Corridor on Moderate versus Severe LRT noise impacts.

Tunnel Swaps Noise for Vibration

As stated in the SDEIS, the tunnel section of the SWLRT is supposed to eliminate “almost all noise impacts within that segment of the corridor.” It must be noted, however, that these noise impacts will be replaced by vibration impacts; see the Vibration Section below.

Analysis of Table 3.4-12

Inaccurate land use designation for the Kenilworth Channel

We strongly question the land use designation of the Kenilworth Channel as Category 3. As defined in Appendix H, Category 3 is:

Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, and churches where it is important to avoid interference with such activities as speech and concentration on reading material...”

The SDEIS designates the banks of the Kenilworth Channel as falling within the most noise sensitive Category 1. However, as stated above, the Channel itself is not included in that most highly sensitive designation, but instead is classified as “institutional land use.” Category 1 is defined in Appendix H as:

Tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use.

The SDEIS states the “grassy area on the banks of the Lagoon” falls within Category 1 due to the “passive and noise sensitive recreational activities that occur there (where quietude is an essential feature of the park).” The designation of Category 1 versus 3 for the Kenilworth Channel appears to hinge excessively on one word -- the term “passive” to describe the activities for which the Channel banks are used. However, quietude is equally and very clearly an essential feature of the Kenilworth Channel itself, whose peaceful though not “passive” activities include canoers and cross country skiers gliding serenely on the water or ice while those on the grassy banks look on. The quietude of the Kenilworth Channel is inseparable from the quietude of its grassy banks; therefore both should be Category 1.

Most significantly, that the consequence of placing the Kenilworth Channel in Category 3 is that both the obligation to mitigate impacts is lowered, and the threshold to establish severe impact is higher and harder to reach. Had the Kenilworth Channel been accurately designated a Category 1, then the Channel would have been only 1 dBA below “Severe impact.”

Even with the lowering of the land use category of the Kenilworth Channel to a Category 3, the SDEIS finds a moderate impact of the addition of LRT noise. The footnote to SDEIS Table 3.4-12, states that the noise impact increases as one approaches the LRT line and becomes severe when the channel falls within the HCRRA right of way.

While the SDEIS states that the land use categories were made in consultation with the MPRB and MN SHPO, we strongly dispute their coherence and accuracy. If the intention of the SPO is to preserve the character and experience of the Channel, then it must designate it as a Category 1 and then make public the mitigation plans and costs well in advance of the final FEIS.

SWLRT Breaks the *System* of Minneapolis Parks.

Horace Cleveland’s visionary masterplan, Suggestions for a System of Parks and Parkways for the City of Minneapolis, proposed a park *system* of connecting sites of beauty and natural interest throughout the city, rather than a series of detached open areas or public squares. The vision of a park “system” has guided the Park Board ever since and is one of the primary reasons for the success and national prestige of the Minneapolis Parks. The SDEIS procedure of singling out specific pieces of park for analysis such as Lilac Park, the Kenilworth Channel and its grassy banks runs fundamentally contrary to the underlying vision of a Minneapolis Park System.

The scenario of perpetual, repetitive LRT noise over the Kenilworth Lagoon and throughout the interconnecting parks and lakes woven throughout this area breaks the larger *system* of the Minneapolis Parks.

Site N 17 (p. 3-182)

21st Street Station Noise Impacts

At the proposed 21st Street Station, crossing and station bells generating a noise level of 106 dBA and LRT bells generating 88 dBA will seriously add to the overall noise levels for 22 hours a day; only between 2:00 a.m. and 4:00 a.m. will neighborhood residents in this area be able to sleep uninterrupted.

The **CIDNA's Analysis of the SDEIS Appendix H Table 1 & p. H-4** given above shows the impact throughout the day and night.

Further, freight trains may need to use their horns to safely cross 21st Street, as is the current case with the "temporary" freight operations.

We thus strongly disagree with the characterization of the noise impacts in the 21st Street station area as moderate and limited. "Sensitive receptors" in this area will be subject to train arrivals, departures, signal bells and perhaps horns, seriously eroding the quality of life in the neighborhood and reducing the enjoyment of the recreational trail and Cedar Lake Park for users of these regional amenities.

We believe that the residences with noise impacts deemed "moderate" in the SDEIS will likely experience severe noise impacts without proper mitigation, and that in addition to the residences identified, residences along 21st Street, 22nd Street, and Sheridan Avenues will also experience at least a moderate noise impacts. We further believe that there will be an impact on more residences than the 24 cited in the SDEIS.

Note: The SDEIS misidentifies some of the homes deemed to have a "moderate impact without mitigation" as being on Thomas Avenue South; some of the addresses are actually on Sheridan Avenue South.

LRT Horns are Likely

According to the federal Train Horn Rule⁵, locomotive engineers must sound horns at a minimum of 96 decibels for at least 15 seconds at public highway rail grade crossings. Appendix H indicates that LRT Horns are 99 decibels and are sounded for 20 seconds. The SDEIS states that LRT horns would only be sounded at crossings where speeds exceed 45 mph. Since LRT and freight trains may not reach that speed in the Kenilworth Corridor, presumably no horns would be sounded when LRT vehicles cross 21st Street. Given the volume of pedestrian, bicycle, and car traffic at this crossing, it is not safe to silence LRT horns at this crossing. The noise created by horns sounding for LRT trains at least 96 decibels for a minimum of 15 (or 99dBA for 20) seconds represents a "severe" noise impact and is therefore prohibitively detrimental to quality of life in a residential neighborhood.

Issues Not Addressed in SDEIS Noise 3.4.2.3

Not addressed: Impacts near Portals

Two areas of potential noise impacts do not appear to be adequately addressed by the SDEIS.

First, table 3.4-11 does not appear to cover noise that will be experienced by the homes directly behind the SWLRT tracks after it emerges from the tunnel and crosses the Kenilworth Channel. Since LRT on ballast and tie track produces noise at 81 dBA, we believe that those residences will experience noise at the same level as homes on Burnham Road and Thomas Avenue South. Further, Appendix H notes that noise will increase by 1 dBA for homes within 100 feet of the tunnel entrance/exits. We strongly request that noise impacts be determined for those residences and that they be included in consideration for noise mitigation. We further request that the cost of that additional mitigation be included in the costs of the Final DEIS.

Not addressed: Tunnel Ventilation System

Second, noise from the tunnel ventilation systems does not appear to have been considered. The SDEIS states that the tunnel section of the SWLRT is supposed to eliminate “almost all noise impacts within that segment of the corridor.” However, we understand that there will be ventilation fans connected to the tunnels as well as a ventilation “building” planned near Cedar Lake Parkway. The SDEIS neglects assessment of the noise impacts from such a ventilation system, and this information is critical to determining whether the proposed tunnel would have a positive or negative environmental impact. Policy-makers and citizens need adequate information on the noise impacts of both the vents and the ventilation building before proceeding with tunnel construction. Appendix H indicates that the fans will operate only on an emergency basis, but we do not see any mention of the ventilation building in the SDEIS. We request clarity on the amount of time each day that they will be operational and creating noise impacts, and the dBA of each.

Not addressed: Freight Operations

The existing freight operations, intended to be temporary, are being made permanent. The noise generated by these trains, which often have three or four engines, must be measured and considered in the overall assessment of noise impacts of the SWLRT project.

The SDEIS simply states that the noise issues described above will be addressed in the Final EIS and that they will be mitigated. We take the strong view that now is the critical and only time to prove that mitigating the noise issues we have described is possible and that the cost of such mitigation is in the budget.

3.4.2.4 Vibration

Long-Term Direct and Indirect Vibration Impacts

The SDEIS states, “There are no vibration impacts in this segment [of the SWLRT route]” This claim is not credible in view of advice provided in *Transit Noise and Vibration Impact Assessment*, the FTA’s own guidance manual presenting procedures for predicting and assessing noise and vibration impacts of proposed mass transit projects:

Vibration from freight trains can be a consideration for FTA-assisted projects when a new transit line will share an existing freight train right-of-way. Relocating the freight tracks within the right-of-way to make room for the transit tracks must be considered a direct impact of the transit

system which must be evaluated as part of the proposed project. However, vibration mitigation is very difficult to implement on tracks where trains with heavy axle loads will be operating.”⁶

The SDEIS says that 54 residences⁷ in the “St. Louis Park/Minneapolis” segment (note that all of them are within Minneapolis) will be impacted by the ground-borne noise. This is an unacceptable level of impact on those 54 families.

According to Appendix H, which addresses both noise and vibration, the table titled Typical Maximum Noise Levels(dBA) on page H-19 quantifies the dBA for LRT, freight and then lawnmowers and buses idling. The dBA for freight rail in that same table is shown for a speed of 20 MPH. The freight in the Kenilworth Corridor travels at a maximum of 10 MPH. For comparison purposes, the assessment should use the dBA of freight trains traveling at 10 mph. Use of the sound impact from a train travelling twice as fast (20 mph) as the current speed in the corridor understates the current noise level (from freight), thereby minimizing the impact and differential from the LRT trains.

Regardless of whether the residences are impacted by vibration from the tunnels or from the noise which is flagged as a “Residential Annoyance” in the tables in Appendix H, the fact that these “annoyances” will occur incessantly — 220 times per day starting at 4 a.m. and continuing to 2 a.m. — means the impact on those residents will be significant and should be considered “severe”. This is very unlike the impact of the freight trains: they may in some cases may be louder than the LRT, but there are only one or two of them per day — often not during the night hours — and then they are gone.

Regarding ground-borne vibration and noise, it should be noted that the impacts projected may underestimate real-world impacts, which could be more annoying than assumed. The FDA manual states:

...the degree of [ground-borne vibration and noise] annoyance can not always be explained by the magnitude of the vibration alone. In some cases the complaints are associated with measured vibration that is lower than the perception threshold.

Short term vibration impacts

The SDEIS all but ignores construction-related ground-borne noise (vibration) — except for a single, dismissive comment: “Short-term vibration impacts are those that might occur during construction of the LPA while jackhammers, rock drills, and impact pile-drivers are being used.” Within a month of this writing, impact pile-driving on the former Tryg’s restaurant site in the West Lake Station area caused serious damage to the Loop Calhoun condominiums, as well as some level of damage to the Cedar-Isles Condominiums. The project had to be halted (the piles were extracted), since going forward was deemed to be catastrophic. The pile-driving entailed in building the SWLRT tunnel would take place much closer to these and other condominiums, duplexes and apartment houses. The Tryg’s site incident seems to strongly predict a risk of significant construction-related damage to the homes of hundreds of people who live along the corridor where impact pile-driving for SWLRT is planned.

Furthermore, the recent Met Council sewer project completed in this area caused damage to homes located beyond the “expected” range of distance from construction. Residents who attempted to get compensation for the damage were often told by the Met Council to take the matter up with their own insurance companies rather than through the contractors whose work caused the damage. A specific

⁶ Chapter 7: Basic Ground-Borne Vibration Concepts, 7-9

⁷ All of them are Category 2 receivers: “residences and buildings where people normally sleep.”

⁸ Chapter 7: Basic Ground-Borne Vibration Concepts, 7-6

liability plan and budget should be included in the project cost estimates. There is a “contingency” line item in the budget, but it should be used for truly “unpredictable” costs that arise during the construction, and not for costs that could be, should be, and even are anticipated.

Construction-related vibration impacts could well extend beyond the construction period itself. Damage incurred during construction may not be initially apparent, and could show up months or even years later. Further study is needed of:

- 1) The effects of various pile-driving alternatives on the many at-risk structures
- 2) The costs involved with each of those alternatives;
- 3) The geology of the area, and its ability to support the construction process.

Mitigation

The SDEIS promises mitigation of a number of vibration problems. However, the failure of Met Council mitigation measures taken to address LRT problems experienced by the University of Minnesota and Minnesota Public Radio cast abundant doubt on whether they will be effective here.

With respect to the vibration mitigation (to be further detailed in the Final DEIS), the measures suggested in Appendix H appear to be inapplicable to the many residences that would be affected. The SDEIS describes isolated tables and floating floors. It’s hard to imagine a retrofit of the residences impacted by the vibration affects utilizing “floating floors.” If this is the intent of the mitigation planned for the SWLRT, a cost estimate of the retrofit of all the residences should be included in the Final DEIS.

3.4.2.5 Hazardous and Contaminated Materials

Long-term Direct and Indirect Hazardous and Contaminated Materials Impacts

- Permanent pumping of contaminated groundwater
- Impacts of disturbance of dangers in soils that may have long term health impacts on children and vulnerable adults
- Not covered in the SDEIS is the co-location of SWLRT in close proximity to hazardous and explosive materials being carried by the railroad.

Short term

The DEIS called for Phase I ESA to be completed, and it was completed in August 2013. It was not made public by the Met Council until May 19, 2015, and indicates many potentially hazardous and contaminated sites along the alignment. It is reasonable to expect to encounter extensive contamination in the Kenilworth Corridor. In addition to being home to several railroad tracks, the Kenilworth Corridor was home to a maintenance yard, blacksmith and boiler shops, a diesel shop and a 90,000-gallon fuel storage facility. In addition, the land was used as a dump — a common practice of the time, and it is likely that arsenic will be among the dangers encountered, requiring special remediation.

The Phase II Environmental Site Assessment (ESA) is said to be near completion; the report must be made available for public review and comment as soon as it is available. The SDEIS says it is “reasonable to expect that previously undocumented soil or groundwater contamination may be encountered during construction.” It is unclear if any findings in the Phase II ESA have been incorporated into the cost increase recently made public.

The cost of such remediation is unknown and has not been included in the cost estimates. Several sections of the alignment have been designated part of the MPCA Brownfields Program. In the best-case scenario,

they will not require much remediation; in the worst case, they will become a Superfund site, requiring significant and expensive remediation.

We attempted to receive budget information that would indicate what amount of the increase in the budget from \$1.65 billion to \$1.99 billion was earmarked for remediation in this corridor. The SW Project Office provided only the highest level of information, and indicated that they do not track the line items for things like soil remediation on a segment by segment basis, but only in total for the project. We believe that remediation will require a Construction Contingency Plan above and beyond the general Contingency budget line item. The cost of such a Contingency Plan for Remediation should be included in the project budget.

3.4.3 Economic Effects Long-Term Direct and Indirect Economic Impacts

Further, the loss in property tax revenue due to the acquisition of privately-held land has the potential to be offset with increased property tax revenues, if the station areas within the affected city result in higher property values due to improved access and other benefits associated with the proposed light rail stations within the city limits. The loss of property tax revenue could also be reduced if the affected businesses relocate elsewhere within the affected city. Depending on the preferences of the owner, the project would work to relocate the five displaced businesses in this segment. All acquisitions made for the St. Louis Park/ Minneapolis Segment and all potential displacements and relocations of businesses resulting from those acquisitions would conform to the applicable federal and state laws. Businesses displaced by the project would receive compensation and relocation assistance, as discussed in Section 3.1.2.2 of this Supplemental Draft EIS.

As an indirect economic impact, there is also the potential for increased property tax revenues from the potential redevelopment of property around the proposed light rail stations within the Cities of St. Louis Park and Minneapolis. Improved transit access can increase the convenience and desirability of surrounding residential, commercial, and office properties. Light rail transit can contribute to existing market forces that can increase the potential for transit-oriented development or redevelopment.

Comment: CIDNA disputes the statement that SWLRT will positively impact property values, especially around the 21st St station and Channel. The current freight alignment in the Kenilworth Corridor is already a negative and permanent defect on property values, and this becomes magnified as a negative and permanent defect on properties along the line with co-location of SWLRT, which is precisely why some residents expressed this as a reason against co-location. The threat of a collision and derailment as such incidents gain increased attention in the news media will in all likelihood increase the scrutiny of buyers as they evaluate the Kenilworth area as an investment and home for their families. Further, the increased noise, vibration, and light without the previously promised removal of freight rail is an exponential increase on aesthetic disturbance in the neighborhood, that in the past was well known for its park like feel and up north atmosphere and a truly special neighborhood in the city. The increased adverse effects of co-location will be a forever permanent defect to homes within earshot and sight of the line; auditory adverse effects would reach as far as Lake of the Isles Parkway based on the audible sounds of the current freight line, but as a much more disruptive cacophony of bells and horns versus the current “low rumble” of freight.

Further, while studies such as rtd-fastracks.com and others show that the access to light rail increase property values in high density, transient (apartment-filled), younger, urban neighborhoods, the area around the Kenilworth corridor is not representative of those attributes. The study mentioned, among others, shows that higher income and low density neighborhoods do not see the positive impact on property values and rentals, which are minimal in the area, as they do in lower to middle income neighborhoods that more regularly use public transit.

While the 1600 ride/day numbers has not been substantiated and is unrealistic, there will nonetheless be an adverse impact from those who do park in the neighborhood to access the station, resulting in residents closest to the station losing on street parking in front of their homes. This will create a parking lot feel to the low density neighborhood and be a detractor from potential buyers, negatively impacting home values.

Finally we do not support denser development in the area (with the exception of the W Lake Station area if land is available) nor would it be feasible on any meaningful scale due to the mature and stable nature of the neighborhood and any free space available. Any development would further denigrate the existing green space in the corridor, especially around the 21st St station which is the access point for the beach and trail access for the neighborhood.

Additionally, the negative economic impact on the entire “brand” of the City of Minneapolis by running a divisive, noisy, and environmentally unsound line through the crown jewel of “The City of Lakes” park area will forever cause a negative impact on tourism as the former serenity of the channel, lagoon and lake are disturbed with the imposition of Light Rail. The larger, more oppressive bridge will denigrate the current experience enjoyed by kayakers, walkers, bikers, etc. and cause tourists to leave the city to get that natural experience they currently enjoy.

We therefore dispute and challenge the SDEIS statement that mitigation for economic impacts is not warranted for the Kenilworth Corridor, particularly in the absence of any plausible property impact study.

3.4.4.2 Roadway and Traffic

As summarized in Table 3.4-1, there would be three new at-grade light rail crossings of roadways within the segment (Wooddale Avenue, Beltline Boulevard, and West 21st Street). At each crossing, light rail operations would impede vehicular traffic for approximately 50 seconds approximately 12 times per hour (six times per hour in both directions).

CIDNA is concerned about emergency access being reduced 12 times per hour to East Cedar Lake Beach and the residences on Upton Avenue S. The freight train which was originally to be removed, coupled with the light rail line, will exponentially impair access further. We see no possible way to mitigate this impact even beyond the measures that are mentioned in the SDEIS.

3.4.4.3 Parking

Indirectly, the LPA could affect the supply of and demand for off-street parking in the St. Louis Park/ Minneapolis Segment due to development new light rail station areas. Any development occurring within the segment would, however, be required to comply with the City of St. Louis Park's and the City of Minneapolis' parking requirements, which would tend to ensure a long-term balance of parking supply and demand.

CIDNA is concerned that there is complete disregard in the SDEIS for the impairment of on street parking availability in its neighborhoods for residents and their guests., as well as emergency access to those homes, especially in winter when streets are narrowed. CIDNA strongly opposes any park and ride lots as that would significantly impair the parklands and would not be compliant with Minneapolis city policy.

3.4.4.4 Freight Rail

Freight Rail Summary

- **Light rail/freight rail Swap and Southerly Connection with some modified freight rail operations**
- **Remove approximately 11,771 feet of freight rail siding track segments in the Bass Lake Spur**
- **Temporary movement of the freight rail tracks during construction in the Kenilworth Corridor**

This section provides a summary of existing freight rail operations in the St. Louis Park/Minneapolis Segment and how the proposed LPA could impact those operations in the long term and short term. In addition, mitigation measures addressing adverse impacts to freight rail operations are identified.

As summarized in Table 3.4-1, the LPA would result in the light rail/freight rail Swap and Southerly Connection, with some modified freight rail operations; the removal of approximately 10,375 feet of freight rail siding track segments in the Bass Lake Spur; and temporary movement of the freight rail tracks during construction in the Kenilworth Corridor.

A. Existing Conditions

This section describes the existing freight rail ownership and operators in the St. Louis Park/Minneapolis Segment.

Exhibit 2.3-4 illustrates the existing freight rail ownership and operators in the St. Louis Park/Minneapolis Segment. In summary, CP owns the Bass Lake Spur, on which TC&W currently operates freight rail service. The Bass Lake Spur directly connects to the HCRRA-owned Kenilworth Corridor, on which TC&W trains operate, before connecting to the BNSF-owned Wayzata Subdivision. The Bass Lake Spur also connects to the MN&S Spur via the Skunk Hollow switching wye (illustrated on Exhibit 2.5-5). The switching wye provides freight rail access to the Robert B. Hill Company salt facility at the west end of the switching wye, which is the only business in the St. Louis Park/Minneapolis Segment that receives direct rail service. The switching wye also allows CP and TC&W trains to connect between the Bass Lake Spur and the MN&S Spur, which is also owned by CP.

TC&W railroad operations have changed since the Draft EIS (refer to the Freight Alignment – Traffic Impact Evaluation Memorandum; Kimley-Horn and Associates, Inc., 2013; see Appendix C for instructions on how to access this report). Currently, TC&W typically operates 14 weekly trains (about two per day) with 65 to 75 cars and 5 to 6 unit trains (currently no more than one per day) with approximately 80 to 125 cars per train. CP operations remain unchanged from the Draft EIS, with 10 weekly trains with one to two locomotives and 10 to 25 trains per car.

Response:

The SDEIS states the need to develop and maintain a balanced and economically competitive multimodal FREIGHT rail system as justification of the project. However freight was never supposed to be included in the LPA, and why does colocation further justify this project when it was to be a LRT only project. The SDEIS never looked at alternative transit modes for serving the southwest suburbs with the consideration of colocation, but only under the consideration of both the location of SWLRT to Kenilworth and the relocation of freight to some other corridor. From the beginning, the project's process was flawed. All of the Met Council's environmental studies assumed freight rail would be relocated out of Kenilworth. Now the Met Council is proposing freight rail remain in Kenilworth and be co-located with LRT. We are taking a temporary situation that was supposed to go away (freight) and making it permanent.

Historically, the Original Project Scoping Report stated that "Freight Rail is independent of the Study." Although the Federal Transit Administration (FTA) noted this erroneous assumption when it approved preliminary engineering, neither Hennepin County nor Met Council ever amended the Scoping Report to include freight rail. When the Locally Preferred Alternative (LPA) was selected in 2009-2010, under the assumption that freight rail would be re-located and that LRT would run at-grade in Kenilworth, the costs and concerns of relocation were not addressed in either the scoping report or the later DEIS. In 1998, when freight was reintroduced to the Kenilworth Corridor, freight was to be a temporary alignment until SWLRT came. All along, this promise was made to Minneapolis and the Cedar Isles Dean and Kenwood neighborhoods. Now, the proposal would make this permanent. Hence, SWLRT DEIS or SDEIS never did a true alternatives analysis using the assumption of colocation.

Prior to colocation, there was no active community groups fighting SWLRT, until colocation was forced upon the SWLRT design. The Kenilworth community, has actively fought against the colocation of freight and LRT since the summer of 2013 when it was introduced. Since then, our education on the risks of colocation have been eye opening.

The Municipal Consent process has been designed so that once a project's elements and impacts are known, public officials can make informed decisions. However, since freight COLOCATION with LRT and tunneling was never part of the original LPA and subsequent DEIS, municipal consent was given without foreknowledge of the risks to both community and environmental safety. Now the SDEIS is similarly devoid of important human and environmental safety information around colocation of freight and SWLRT.

The SDEIS, triggered by the addition of colocation and the necessity of building a tunnel through the Kenilworth Corridor, is remarkable more for what is **not** included than what is included. The absence of substance is reflective of a long process of well intentions that have been poorly planned and executed and which does not bode well for the long term success of this process. These sins of omission, where substantive real issues remain unexamined is especially present in the environmental section dealing with freight and the later section dealing with safety. The SDEIS, appears to be largely a rehash of the DEIS with no additional substantive issues around colocation dangers and safety, and its absence in the SDEIS contains a silence that is deafening. The SDEIS never answers the most important question, which is 'why colocation?' The SDEIS contains nothing about routing alternatives, or the reasons why this route

was chosen with colocation. It contains nothing about substantive safety concerns of colocating high hazard freight feet from LRT construction and later LRT trains. The story of colocation is important to the process because it reflects planning that has been and continues to be haphazard and blind.

The history of SWLRT colocation has resulted in many community members becoming expert activists. Nationwide, there has been a radical change that is occurring in high hazard freight, with community awareness of these ‘bomb trains’ running through our towns and cities. High hazard trains have long run through our communities, but never with the frequency nor the amount of dangerous materials being hauled, and Kenilworth corridor is a high risk evacuation blast zone were a high hazard freight derailment to occur. Running these trains through any populous areas is undesirable and puts many in the “blast zone”, running 1/4-1/2 mile on either side of the track, and Kenilworth has this problem as well. (See Claire and Dave’s Map).

The original DEIS did not recommend colocation because of adverse environmental and safety impacts. In fact, the recently released SDEIS only talks about the effects of LRT on freight rail (mostly economic impacts to minimize time lags on freight during construction), not on the environmental and safety effects of colocation of freight and light rail through the corridor.

Freight railroads have radically changed since the reintroduction of freight into the Kenilworth Corridor. The federal mandates on ethanol, the running of unit trains carrying single high hazard products, and the use of much longer trains has increased freight safety concerns. TC&W currently is the only engineer that is allowed to take trains through the corridor, but can connect to any other carriers to take those trains through, and currently partners with Canadian Pacific to carry their products through Kenilworth. Federal rail policy requires that the interests of freight rail operators and shippers be considered in the development of passenger rail service. In order to provide elected officials, policy makers and members of the public with current, factual and supportable information about the impact of TC&W and its operations, TC&W commissioned a study in 2013. According to this report by Klas Robinson, ‘in 2012, TC&W hauled over 2.4 million net tons of goods, traveling more than 2.1 million net ton miles on behalf of its customers. ‘TC&W provides rail service to numerous companies in Minnesota and neighboring South Dakota, hauling such diverse products as corn, soybeans, wheat, sugar, vegetables, ethanol, crushed rock, metals, plastics, potash, fuel oil, distillers oil, machinery, lumber, manufactured goods, propane and fertilizer, including anhydrous ammonia’. Ethanol, propane, fuel oil and fertilizers are all high hazard products. Distiller’s oil, and potash are also flammables. Exposure to even small amounts of anhydrous ammonia can cause serious burning of the eyes, nose, and throat. Exposure to higher levels causes coughing or choking to occur and can cause death from a swollen throat or from chemical burns to the lungs. A single tanker car of anhydrous ammonia can put hundreds or even thousands of area residents at risk in case of derailment and breach. When the eyes are exposed to concentrated gas or liquid anhydrous ammonia, serious corneal burns or blindness can occur. In general, the severity of symptoms depends on the degree of exposure.

Through 2012, ‘customers of Twin Cities & Western Railroad Company and its affiliates shipped more than 23,400 cars, including almost 17,700 cars on TC&W and over another 5,700 cars on a short line railroad that uses TC&W to reach the Twin Cities’. That number continues to expand annually, with ‘the number of monthly cars shipped on TC&W during the first four months of 2013 significantly higher than for the same periods in each of the three prior years – almost twice that of first quarter 2012 (94.0 percent greater), almost 40.0 percent higher than first quarter 2011 and 70.0 percent greater than first quarter 2010’. ‘Annual sales for the 20 largest TC&W clients range from almost \$3.0 million to more than \$400.0 million with estimated combined annual sales of almost \$4.0 billion, more than 37.0 percent of which are shipped via Twin Cities & Western Railroad Company – which equates to almost \$1.5 billion in client goods shipped via TC&W annually’. As the economy has improved since the recession of 2008, we can expect that the number of train cars and the frequency of trains will increase. According to the Minnesota

Department of Agriculture, between 2000 and 2011, ethanol production in Minnesota increased by over 5 times and each subsequent year has continued this trend. With the nation-wide federal mandate to double (increase ethanol in gas to 20%), we can also expect the production and transport of these high hazard products through the corridor to radically increase. It is clear that the TC&W that was temporarily reintroduced in the corridor in 1998 is not the TC&W that runs through the corridor now.

According to TC&W, they 'have Class I rail connections to Canadian Pacific, Union Pacific, BNSF Railway and Canadian National, reaching markets in 39 U.S. states, seven Canadian provinces and four Mexican states'. Their network would potentially allow them to carry anything including nuclear products, Bakken Oil, anhydrous ammonia, chlorine, etc..... Common Carrier freight legislation requires that shippers (currently TC&W and CP) carry anything that their customers demand. Additionally, at any point, TC&W could sell their company to one of the major railroads, like BNSF, which could generate 10 times as much traffic and hazardous materials into the corridor.

Safety of freight trains is controlled by the Pipeline Hazardous Materials Safety Administration (PHMSA). Historically, standards have been lax, prioritizing commerce over safety and the environment. Recently, after public pressure, PHMSA has toughened safety standards for most railroads. However, TC&W, which is a Class III rail carrier (short lines with lower revenues), has been and continues to be exempted from certain safety standards that guide more profitable and larger Class I and II railroads. Ethanol is carried in the now infamous DOT-111s and will not be banned, according to PHMSA for another 5-7 years. Railroads have lobbied heavily to remove current and future regulations on them to maximize their profits, including recently passed breaking mechanisms on the hazardous cars. They have lobbied to go from two person crews to one or two person crews. The push of freight railroads to migrate from two person crews to one person operators (pending legislation in US House mandating two operators was introduced last year but went nowhere due to strong RR lobbying). A single point of freight operator would reduce safety due to overload, fatigue, etc. And railroads have fought to delay the introduction of safer double hulled tanker cars and to continue to carry their hazardous cargo in dangerous substandard DOT-111 freight tanker cars. Freight infrastructure has suffered, and nearly all derailments are due to substandard equipment, track failure or operator error. Some new PHMSA standards that attempt to improve safety of hazmat freight may not even apply to TC&W due to their small Class III status. Class III railroads also have less money to invest in infrastructure, and it is clear that this railroad has infrastructure issues, experiencing a derailment in 2010. Despite replacement of rails to single weld track in 2012, TC&W still suffers from infrastructure issues, like rotting cross ties, missing rail plates and missing rail spikes which hold the rails in place. From May 2015 to July 2015, potholes have bordered the track at Kenilworth crossing, and have went unfixed despite calls to TC&W and MNDOT.

The FRA estimates that there will be at least 10-20 oil or ethanol derailments per year going forward. Nationwide, we had over 7000 train derailments of some kind in 2014. These concerns are not just theoretical.

The mix of commodities that TC&W carries has changed over time, with approximately 30% of TC&W's freight being ethanol. It has only been in the last 5-10 years that unit trains of a single commodity have been a common occurrence. Prior to that, manifest trains, carrying a variety of commodities was much more common. Unit trains of 100 cars of ethanol, a highly flammable product, daily traverse the corridor. Through the planning process, the Met Council repeatedly told us that the primary products in Kenilworth were agricultural, which sounds innocuous. While ethanol may be an agricultural byproduct, it is highly dangerous. According to Karl Alexy of the FRA, ethanol is more dangerous than most crude oils, with a lower ignition point, and higher explosivity potential. Its Hazard Packing Group rating (II) is higher than most crude oil (because of its explosivity potential). For oil, only Bakken Crude matches its danger due to a high level of byproducts added to Bakken oil and its consequent instability. Ethanol burns hot enough to

melt steel structures (3488 °F). The melting point of steel is 2795 °F. The freight through Kenilworth currently runs feet from bridges and high rises that would be vulnerable in the case of a derailment.

Of great concern are the waivers requested by the Met Council from the FRA to put jurisdiction of the colocated corridor under FTA with the FRA abdicating jurisdiction. The combination of placing both modes of transport which have radically different missions in the same corridor is highly problematic, particularly with such close proximity. The FRA seems to be abdicating jurisdiction, except for five named at-grade crossings where both freight and LRT cross together, and even here the Met Council could apply for a crossing waiver.

The existence of freight alone is of great concern to residents along the Kenilworth Corridor. But the construction of SWLRT running right next to high hazard freight is of particularly alarming concern to residents.

B. Potential Freight Rail Impacts

This section identifies the potential long-term and short-term impacts that would result from the changes to how the LPA would change the freight rail movements within the St. Louis Park/Minneapolis Segment.

Long term direct and Indirect Freight Rail Impacts

This section describes the long-term direct and indirect freight rail operation impacts in the St. Louis Park/ Minneapolis Segment. Proposed modifications to existing freight rail facilities within the St. Louis Park/ Minneapolis Segment are described in Section 2.5.3 of this Supplemental Draft EIS. The proposed LPA would generally result in no changes to existing freight rail operations because all segments of existing mainline freight rail track would remain unchanged, except for relatively minor modifications to some track to accommodate the construction of the proposed light rail line. This includes construction of the Southerly Connection between the CP Bass Lake and the MN&S spurs (see Section 2.5.3 and Exhibit 2.5-5 of this Supplemental Draft EIS for additional detail) to replace the existing Skunk Hollow switching wye to allow continuation of freight in that section of the corridor. While this would change the geometry of the freight rail alignment for the movement of freight rail between the Bass Lake Spur and the MN&S Spur, it would not result in substantial long-term impacts to freight rail operations.

In addition, the LPA would result in the removal of 11,771 feet of siding along the CP Bass Lake Spur, eliminating the backing of freight trains at the Woodpile Avenue crossing that occurs under exiting conditions. The removal of the siding tracks would be negotiated with the freight rail owner and operators, which could include negotiated compensation for adverse effects to their operations. No indirect effects to freight rail transportation are anticipated.

Long term freight Response

Hazardous freight is a nationwide problem seeking a solution. Throughout the planning process Kenilworth was chosen as the LPA with the intention to move the freight out of the corridor. The existing situation in the Kenilworth with freight only is already problematic. The addition of LRT in a corridor that does not meet the minimum AREMA safety guidelines of 25 feet separation center to center rail is untenable. In fact AREMA recommends a 200 foot separation as optimal. Many will say that across the nation, we have corridors that contain both freight and passenger trains that are in narrow corridors that do not meet minimum safety standards. However, our increasing awareness of freight danger has meant

that going forward, communities are much more exacting on safety standards and meeting those minimum AREMA guidelines. In fact, in no other project currently under construction can we find a project that won't meet at least the minimum 25 foot grade separations that this project long term will not meet.

The multiplicative risks of running freight next to LRT are unmentioned in the SDEIS, even though we know that the majority of freight or LRT derailments are either track failures or operator error. There is absolutely nothing in the SDEIS that deals with an evaluation of risk or readiness of dealing with a derailment, especially of a high hazard product.

LRT catenary wires that regularly spark off the pantographs will run, in some places 10-15 feet from freight. In 2014 alone, FRA reported 43 'accidents' in the US related to pantographs. Even with the eventual placement of crash walls, catenary electrification runs immediately adjacent to highly flammable unit trains (80-125 tanker cars) of ethanol. Ethanol is vulnerable to ignition by electrostatic charges and has a higher ignitability than most forms of crude oil. It burns hot enough to melt steel structures and substructures. Ethanol vents at the top of trains will run closest to those electric wires.

TC&W and C&P trains use DOT-111 tanker cars. These trains carry ethanol, fuel oil, propane, fertilizers (including anhydrous ammonia), distillers oil, and potash regularly traversing the Kenilworth Corridor. These old generation tanker cars have single hulls prone to thermal tears and punctures, and leaky valves. They are more likely to tear or puncture than newer generation replacements like the double hulled DOT 117s. The National Transportation Safety Board (NTSB) discovered problems 24 years ago with DOT-111 tankers but USDOT did nothing. In 2012, the NTSB called for an immediate ban on using these tank cars to ship high hazard products like ethanol and crude oil because they are prone to punctures, spills, fires and explosions in train derailments. Two in three tank cars used to transport crude oil and ethanol in the U.S. are DOT-111s, yet the DOT has taken no action beyond issuing a safety advisory urging shippers to use the safest tank cars in their fleets to the extent feasible. Only recently has PHMSA come out with new regulations to replace these dangerous tankers over a 6 year time period. However, the rule defines and applies to "high-hazard flammable trains" (HHFTs) as a continuous block of 20 or more tank cars loaded with a flammable liquid or 35 or more tank cars loaded with a flammable liquid dispersed through a train, making it certain that single hulled DOT-111s trains will continue through Kenilworth for years to come.

Another serious concern with freight is the misclassification of rail car. PHMSA first launched Operation Classification in the summer of 2013, in response to increased activity in the Bakken region. Initial testing has revealed that 61% of high hazard oil was misclassified. Sometimes the train manifest may not actually reflect what is being transported by the freight.

According to the Department of Homeland Security, high hazard train tankers are vulnerable to terroristic threats. The proposed SWLRT will run adjacent to freight through St. Louis Park and Kenilworth Corridor all the way into downtown where it will join Northstar Commuter rail in tri-location, until it stops at the Target Station. HHFTs have been coined 'bomb trains' by many, and this tri-location terminating at the Target Station is concerning. The Department of Homeland Security identifies places like the Twins Stadium and the Target Station as high value targets vulnerable to terrorism. The colocation of freight and passenger trains carrying 10,000 thousand tons of highly combustible products underneath the Twins Stadium and to the Target station is a disaster waiting to be prevented. Were high hazard freight not running through this corridor as was originally envisioned with relocation of freight, then the concerns of terrorism would be diminished. However, tri-location of high hazard freight, Northstar commuter trains and SWLRT near to and underneath the Twins Stadium to the Target Station is planning gone awry. If we believe that terror groups are unaware of these high value target vulnerabilities in our system, we are likely sadly mistaken. Where tri-location of high hazard freight, Northstar and

SWLRT will run under the Twins Stadium and to the Target Station, the SDEIS contains no acknowledgement of these multiplicative risks or of risk readiness.

In fact, the SDEIS does not contain one word acknowledging high hazard freight through Kenilworth. There is evidently no safety plan should an ethanol or other hazmat freight derailment to occur, and no containment and recovery planning should a disaster encroach on the tunnel and/or spill in to the Minneapolis Chain of Lakes.

Hennepin County, the Met Council and the State of Minnesota have little power going forward in determining whether or not TC&W's model of business increases. They also have no ability to stop TC&W should they choose to sell. These risks to this corridor are likely to only increase as federal mandates to increase the mix of ethanol from 10% to 20% in gasoline mixtures are initiated. TC&W could choose to sell, likely to BNSF, who could make this an extremely busy corridor which would transport an even more numerous mix of hazardous chemicals. Common carrier obligations mean that TC&W must carry whatever their shippers desire (for example anhydrous ammonia, chlorine..., where a single car derailment could kill hundreds or even thousands).

Heavy freight causes vibrations that can travel through the ground. Long term damage from vibrations of heavy freight to LRT structures and vice versa raise concerns long term, and going forward. As a nation, we prefer new projects to taking care of existing infrastructure, where the state of our current freight rail infrastructure is poor, even along the Kenilworth Corridor. Vibrations are also affected by the ground substructures where water logged soil tends to increase those vibrations. Problems with ground – borne vibration and noise are common when there is less than 150 m between the railway track and building foundations, and here the LRT will run within 1.5 feet of the Grain Silo Condos. Long term damage to LRT infrastructure from heavy freight vibration within feet of buildings is highly problematic for both noise, vibration and for property damage. This will be multiplied by the addition of LRT, running adjacent. Whether the problem will be perceptible vibration or audible noise is strongly dependent on local geology and the structure details of the building.

The SDEIS does not explore Met Council liability if SWLRT or freight derails causing a train catastrophe. Currently, freight companies carry limited liability that only covers their rolling stock and train infrastructure. This insurance liability assessment should be done prior to building SWLRT. Who will pay for life lost and or property damage?

Short-Term Freight Rail Impacts

This section describes potential short-term freight rail operation impacts caused by construction of the LPA. Constructing the LPA would have some effects on freight movements in the corridor that would be temporary in nature.

Construction of the proposed south light rail tunnel in the Kenilworth Corridor would require the temporary movement of the freight rail alignment at various locations along the Kenilworth Corridor. The shift would be about 2 to 3 feet to the northwest and would facilitate construction of the proposed light rail tunnel. During the time when the freight rail tracks are shifted to a temporary location, freight rail operations would not be obstructed, discontinued, or slowed. Instead, light rail construction would be stopped by a flagger, and the workers and machines would be moved away from the track whenever a freight train comes through the work area. The cost of the flagging operation for labor and equipment delay would be borne by the project. Despite this, the freight rail operator might choose to continue to travel through the corridor at lower speeds based on its operating procedures. During this reconstruction period, the freight track would be

maintained for a maximum 25-mph track speed, which is the existing condition. However, the TC&W has agreed to hold speed to 10 mph within the Kenilworth Corridor, their existing operating speed at that location (see Section 3.4.3.B of this Supplemental Draft DEIS for additional detail).

Short term freight comments

Similar comments to long term safety exist for short term safety issues, but multiplied many times. Tracks are separated by less than 25 foot AREMA guidelines, as close as 11-12 feet. During construction, the dangers to the community will be much higher due to the fact that freight, particularly hazmat freight, will continue through the corridor. The plan to use flaggers will mean that freight, which will get priority during construction, will stop LRT construction workers while freight passes. During construction a 35 foot wide (upon completion) and 25-35 foot deep trench with pilings to around 50 feet will be constructed. The freight will run right next to this construction pit at a time when the corridor will be filled with construction workers and construction debris. The freight will be allowed to pass and the construction will resume. At this point, there will be no crash walls.

The track geometry at the narrow points through the corridor do not seem to align with any kind of safety standards that are logical. The corridor at the narrowest point is 59 feet at the pinch point. This point runs between the historic grain condos on the east and the red town homes to the west side. The SDEIS states that they will move the freight tracks 2-3 feet closer to the red condos. The tunnel trench will be dug at the base of the grain tunnel within about 1-2 feet of the footings of that building. There will be a buffer between the red condos to the east of around 22-24 feet and the freight train is about eight feet wide (35 feet wide + 2 feet + 24 feet + 8 foot wide freight train = 69 feet). This math does not inspire confidence in the safety of the construction zone. This will mean that during construction, freight will run through a construction zone with construction workers and debris with **no crash walls** at literally the edge of a 35+ foot construction trench carrying high hazard freight including ethanol, fuel oil, and fertilizer with NO crash walls. Plus under common carrier obligation, TC&W or CP must carry whatever else their shippers ask them to carry and we may or may not know what these trains are actually hauling. That train is literally, at the edge of that construction pit, and construction will take two years to complete. Two years with no crash walls to prevent that train from falling into that construction trench. If there were a derailment, that freight train would fall into that construction pit one after the next in a spectacular domino type fashion that would certainly lead to an explosion at the foot of the oldest most historic 12 story grain tower condo in Minneapolis filled with residents, and next to town homes whose beds may be less than 20 feet away. High Hazard ethanol freight can melt steel structures. People live their lives in those condos every day, and people are put into harm's way because of colocation.

Construction by its nature disturbs the safety of freight by disturbing those freight tracks and infrastructure. When soil is disturbed, its composition will effect its stability. The composition of the soil along the Kenilworth is between the chain of Lakes and where the water table is high. The geometry of constructing a tunnel in boggy soil immediately adjacent to active hazmat freight raises the risk of derailment.

It is also important to point to the poor condition of freight rail infrastructure currently which increases risk for a short term freight derailment both during and after construction. From late May through July, two pot holes painted pink at Cedar Lake Parkway freight crossing measuring as deep as 6 inches have remained unfilled despite being reported to DOT and to TCW. In 2010, there was a derailment by a TC&W train and the track through Kenilworth was replaced with a single weld safer track. However, rotted freight ties were not replaced at that time, nor were rail plates and spikes uniformly repaired. Currently, there are rail ties that are completely rotted out, missing rail plates that hold the ties to the rails and many missing rail spikes. Why these were not replaced when the single weld rail was replaced is an

indication of poor maintenance and concern of both short and long standing freight infrastructure problems.

The construction corridor will be littered with construction debris which will heighten the risk of derailments. Derailments are caused by operator error or track failures, including track impediments. Construction can displace the supporting structures that bolster rail, and although engineers can try to bolster the structures through shoring, there will be nothing to stop a train once it begins to tip into that construction pit. Tip guard rails have been suggested as a solution (not in SDEIS), but can build up with snow and actually cause derailments. With snow build up, the snow pack buildup can launch the train right off the rail.

Nighttime running of freight (also not in the DEIS, but mentioned to Mark Wegner by the SWLRT staff) will be perhaps even more dangerous than day time. People will be asleep in their beds as these trains run only feet from a construction trench. Construction debris may be left near or on tracks and may not be visible to the freight engineer conductor at nighttime. Final day inspection of track is an imperfect science and human error could easily miss track impediments.

Inclement weather like snow may mask destabilization of freight infrastructure and rain can washout surrounding already disturbed soils, increasing the derailment risk during construction.

Additionally, if a derailment were to occur during construction, access to fire safety equipment is extremely limited because of the geometry of the corridor - in some places, the only access is between people's homes and/or through their driveways. In the event of a derailment occurring during construction, the only access for fire trucks may be from West Lake Station, 21st or Cedar Lake Pkwy. Fire equipment must be accessible in case of a derailment emergency, and an in depth coordination between the fire department, Met Council engineers, and the citizens has not been done. It is not even addressed in the SDEIS.

In case of any chemical freight derailment, chemical fires must be fought with specialized foam products, usually some sort of foam specific to the chemical spill. These fires can not be fought with water, which can actually worsen a fire. Water can be used to cool rail cars that have not ignited, but foam is necessary to put them out. Limited foam is available at stations, but for many freight derailment fires, it can take 2 hours or longer to access the necessary quantity of foam to fight a chemical derailment fire. As an aside, Dave Christiansen, an expert advisor to the SWLRT project misinformed a group of concerned residents, saying the ethanol can be fought with water and that ethanol does not burn hot enough to melt steel, both of which are patently false. Dave Christianson has been an adviser to the SWLRT project.

According to TC&W freight president Mark Wegman, there had only been one planning meeting as of June 2015 with SWLRT project staff to discuss issues of joint construction concern. This seems short-sighted. These are issues of such great import to our community and the community has repeatedly been told that the Met Council and SWLRT project staff have everything in control.

The SDEIS does not explore Met Council liability either during or following construction if SWLRT or freight derails causing a train catastrophe. Construction may put insurance waivers in place requiring specific insurance to be purchased guarding against life or property loss to the community. Currently, freight companies carry limited liability that only covers their rolling stock and train infrastructure. This assessment should be done prior to building SWLRT.

Currently, TC&W reports that they go 10 miles/hour through the Kenilworth Corridor, but this is voluntary, and not mandated. Residents believe they often go faster than the speed they claim, and during construction, any speed may have devastating consequences. Derailments can happen at any speed. Going

forward, the company may choose to sell their company or increase that speed. The necessity of slow freight even without LRT construction is critical, but with construction the danger becomes critical at any speed.

C. Mitigation Measures

No long-term impacts to freight rail transportation in the St. Louis Park/Minneapolis Segment are anticipated. Therefore, no long-term mitigation measures have been identified.

In order to mitigate short-term impacts to freight rail operations related to construction activities, the Council will develop and update a freight rail operations coordination plan. The purpose of this plan is to facilitate coordination between the project and the freight railroads throughout the construction period in order to minimize impacts on freight owners and operators without creating unreasonable constraints during construction of the LPA. Freight rail owners and operators in the project area will approve the coordination plan, prior to the start of construction. As part of the effort, Council staff will also work with the freight railroads to provide provisions in the construction contract to identify how the contractor will interact with the railroads. Further Council staff will work with the freight railroads to sequence construction to minimize effects on freight movements and to identify optimal periods for closing the rail service and reducing speeds.

During construction activities, flaggers will be used to allow freight rail operations to continue without interruption, except for the following proposed activities and durations:

- **Four- to eight-hour stoppage when completing the freight rail track swap**
- **Two-day (likely over a weekend) stoppage for MN&S and TC&W trains for turnout construction for the new southerly connection to MN&S tracks**
- **One-day stoppage to shift the bridge over Highway 100 from its location along the current alignment to a location north of the light rail mainline**

Dates and times for all stoppages will be determined by CP, the owning railroad for the Bass Lake Spur, and HCRRA for the Kenilworth Corridor. TC&W will also be coordinated with, as the freight rail operator on the Bass Lake Spur and Kenilworth Corridor. The use of flaggers will require construction activities to halt while freight trains traverse the construction area at regular speeds. Other construction activities will include shifting the existing track into a temporary location (two to three feet to the north/west) to allow for construction of the proposed light rail tunnel. This shift would be gradual, and is estimated to take approximately a week to shift the tracks and another week to shift the tracks back after the light rail tunnel is complete. Coordination between the contractor and the railroads will assist in minimizing disruptions and planning for the expected shutdowns to occur at times that would cause the least impact on freight rail operations. More detailed information on the impacts on freight rail carriers will be identified as construction plans are developed. The Final EIS and freight rail operations coordination plan will include details regarding construction sequencing, schedule, means, and methods.

Response to mitigation measures

It is difficult to respond to this section surrounding freight since no problems with colocation have even been acknowledged in the DEIS. There is no real analysis of the effects of colocation and the danger of running high hazard freight through the Kenilworth Corridor both during and after construction, and in an area that does not meet minimum AREMA guidelines of 25 feet grade separation. This SDEIS is astounding more for what it does not contain than what it does. The mitigation discussed is more concerned for making sure that the freight schedule is unimpeded than for assessing the safety of

neighborhood residents, construction and freight personnel, or future SWLRT riders. The only solution to mitigate this problem completely is to do what was promised for the residents of Minneapolis. That is to go back and relocate freight trains out of this corridor. Minimally, during construction, high hazard freight MUST be diverted from the corridor. The wisdom of running high hazard freight both during construction at the edge of a potentially unstable water logged construction trench without crash walls, and after when potentially leaky ethanol or other hazmat tanker cars will run adjacent to sparking pantographs is extremely concerning.

No-tip guard rails for freight have been proposed for the Kenilworth Corridor, although not in the SDEIS. In a meeting with Mark Wegner of TC&W, he shared his concerns with community members about the build up of snow that can actually lead to freight derailments. They tend to build up snow increasing risk of freight literally sliding off the rails. However the importance of no tip technology in a corridor where trains run for significant times less than 25 feet apart and during construction of a tunnel 25-35 feet deep running immediately adjacent to high hazard freight leaves us in a bind. We both need it to protect us from freight falling into a construction tunnel but also are concerned that it may actually promote a derailment.

Long term, mitigation of crash walls is important between freight LRT is important, but short term, without crash wall, ALL hazardous or flammable freight should be rerouted out of the corridor until proper safety crash walls are present.

With the recent budget shortfalls for SWLRT, we are concerned that mitigation around freight and freight safety will occur. The SDEIS states the need to develop and maintain a balanced and economically competitive multimodal FREIGHT rail system as justification of the project. That the SWLRT project is now intended to further develop a freight rail system, needs further explanation. It is not in the original scope of the project and has been snuck in to the SDEIS, but is confusing and unclear. The DEIS specifically did not recommend Colocation of freight and LRT. The bottom line is that there should be no COLOCATION as was recommended and promised in the first DEIS.

We have been told that these issues will be dealt with as they arise but the freight section of the SDEIS indicates that there is not even an awareness of the danger and concern to area residents or long term to SWLRT passengers.

3.4.4.5 Bicycle and Pedestrian

Because there would be no long-term adverse impacts from the LPA on bicycle and pedestrian facilities, no long-term mitigation measures have been identified. Short-term effects on pedestrian and bicycle routes will be mitigated through signage, information fliers, website postings with maps of construction areas/detours, and notices placed at bicycle shops, for example.

At last measure, our understanding is the trails receive 600,000 discrete unique visits per year and those visits to current parkland are enhanced by the current “north woods” feel of the area, and that experience would be significantly impaired by the addition of light rail. This includes an expectation of natural quiet conditions. Pedestrians do not pass quickly through the park like environment and will therefore be significantly impacted by added noise, movement and infrastructure of the LRT and freight rail. The speed joined with the noise at close proximity greatly detracts from the trail experience for both bicyclists and pedestrians, and can even be frightening to users.

3.4.4.6 Safety and Security

Long-Term Impacts

The current plan to co-locate freight and LRT within the same corridor — within a dozen feet of each other in certain places — creates new, potentially catastrophic hazards. It is currently proposed that the freight train (which carries volatile and explosive ethanol on a daily basis, and several unit trains of ethanol per month) remain permanently in the Kenilworth Corridor. The addition of the SWLRT with its electrical power wires only a few feet away exacerbates the existing danger of ethanol in the corridor. Current safety standards recommend against co-location in such close proximity when there are alternatives; other alternatives for this SWLRT alignment must be explored.

Furthermore, in the event of an explosion of ethanol trains along this corridor, we understand that the foam retardant required to extinguish the fire is “within a 3 hour distance” of the corridor. We believe that the potential harm during that “3 hour window” along with permanent damage to residences and residents should be quantified. Should an explosion occur during the passing of an LRT train, the potential exists for loss of life or harm to those exposed to the hazardous fumes.

Short-Term Impacts

Currently, rush hour traffic produces daily gridlock that sometimes extends from Lake Street, along Dean Parkway, Cedar Lake Parkway, Wirth Parkway, and Wayzata Boulevard (frontage road along I-394) all the way to the Penn Avenue bridge. The closing of a critical crossing (Cedar Lake Parkway at the Kenilworth Trail) would be necessary during the construction of the proposed tunnel from West Lake Street to just past Cedar Lake Parkway. Affected neighborhoods already have limited entry and exit points.

The SDEIS does not address the need to ensure reasonable transportation options during this period, including routes for emergency vehicle access. There must be plans for fire and ambulance routes in the affected neighborhoods. Travel time for emergency vehicles would be increased during that closing. The SDEIS describes such delays as “minor”; we take vigorous issue with such a demotion of safety concerns, as even two minutes could be the difference between life and death, or a home being saved from fire or destroyed. (On June 11, 2015, an accident at Dean Parkway and Lake Street slowed traffic on Dean Parkway to a crawl for over an hour.)

Also missing is information on what measures, including evacuation plans, would be necessary to protect the Cedar Shores townhomes when the TC&W trains, with their explosive freight, are moved several feet closer to them during construction.

Our neighborhoods were recently impacted for upwards of a year by a Met Council sewer-replacement project, with road closures (of which we were frequently not informed) and detours. Now we understand that the sewer project would need to be completely re-done as part of the SWLRT tunnel-building.

3.7 Safety and Security

3.7.2 Existing Conditions, page 3-129

Public safety and security within the study area is provided by the police departments, fire departments, and emergency response units of the cities of Eden Prairie, Minnetonka, Hopkins, St. Louis Park, and Minneapolis. Emergency medical services are located in each city.

Primary safety concerns associated with the freight rail relocation segment of the proposed project, as expressed by the community, are derailments, chemical spills, the accessibility and safety of pedestrians (particularly near schools), and vehicular and traffic safety at grade crossings.

Comment : Please note that residents near the Kenilworth Corridor are equally concerned about such issues as derailments, chemical spills, pedestrian and cyclist safety, and traffic safety.

3.7.3.3 Safety – Long Term Effects - Build Alternatives, page 3-131

The project would be designed in a manner that would not compromise the access to buildings, neighborhoods, or roadways, and would not compromise access to the transitway in the event of an emergency.

Addendum: CIDNA's Position Statement on Freight Relocation for SWLRT

The following resolution, passed by the CIDNA Board of Directors on February 8, 2012, concerns the co-location of the freight rail and SWLRT which is currently under study by the Minnesota Department of Transportation, HCRRA and the Metropolitan Council and asks that co-location be denied on behalf of the adjoining neighborhood.

Resolution

Whereas, this request on behalf of the adjoining neighborhood is based on the earlier assessment prepared by R.L. Banks and Associates issued December 2010 which includes a letter of Dec. 3, 2010 to Ms. Katie Walker, Transit Project Engineer. It states the minimum space requirements for co-location of the freight rail and SWLRT. It concludes that there is insufficient space within the existing ROW to accommodate both freight and LRT at grade in the Kenilworth Corridor. To have freight rail and LRT co-locate at grade, it would be necessary to take property on either the west side or the east side of the existing ROW (right of way) even if the LRT alignment is shifted from its planned location.

Whereas, that report also contains a listing of seven scenarios that are injurious to the bicycle path, requirement of the acquisition of 33 to 57 housing units which would disrupt an entire townhouse community or acquisition of 117 housing units as well as other alternatives that would create noise and aesthetic impacts and other environmental impacts.

Whereas, the overall negative effect on the adjoining neighborhoods and park system would be detrimental to the environment.

Now Therefore, the CIDNA Board requests that the co-location of the freight rail SWLRT on the Kenilworth Corridor be denied.