

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

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## **Overview:**

### **Purpose and Need:**

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

The DEIS has concluded that the Locally Preferred Alternative (LPA) will bring significant benefits to the region. The DEIS states that 10,000 new construction jobs will be needed for this project. 6,800 new transit riders and close to 29,000 total riders (many are reverse commuters) will use the LPA corridor each day once the line has been finished. A 31.5 minute transit ride from the Mitchell Road station to Downtown Minneapolis is very competitive with driving travel times and the line will reduce congestion in the region. The LPA corridor is consistent with local land use plans that will increase density and economic development around stations, increasing the tax base. Finally, the LPA will provide frequent transit service to parts of the Twin Cities that have poor or inconvenient existing service. This project will provide transit opportunities to thousands of people in the region who must currently rely on other modes to get around.

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

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

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

### **Public Agency Coordination and Comments:**

The City of Minneapolis commends both Hennepin County and the Metropolitan Council for ensuring that the DEIS is widely available in a number of mediums for the public to review.

There are adequate opportunities for the public to comment either in writing or at one of the public hearings being held throughout the corridor.

The City of Minneapolis will be particularly sensitive to any private property needed for the project. Private property taking should be minimized.

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## **Alignments Considered and Evaluation of Alternatives:**

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

#### **General Comments:**

The City of Minneapolis has endorsed the Locally Preferred Alternative, which will traverse the Kenilworth Corridor, providing stops at West Lake Street, 21<sup>st</sup> Street, Penn Avenue, Van White Boulevard, Royalston Avenue, and the Interchange. Each of these Minneapolis stations is paramount in the project's overall success.

### **Nicollet Avenue Alignment (Route 3C):**

#### **General Comments:**

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

#### **Specific Comments (by section):**

Table 11.1-1

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

### **11<sup>th</sup>/12<sup>th</sup> Street Alternative (Route 3C-2):**

#### **General Comments:**

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

#### **Specific Comments (by section):**

Table 11.1-1

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

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

#### **General Comments:**

City of Minneapolis support for the Locally Preferred Alternative is based on the premise that freight rail will be relocated from the Kenilworth Corridor. The City of Minneapolis will not

accept the co-location alternative in which freight, LRT, and trails are placed in the same corridor. While the Federal Transit Administration has directed that the Metropolitan Council examine this option, it will not be accepted by the City of Minneapolis as part of the municipal consent process. The co-location option will displace dozens of households, will create irreversible damage to the character of the neighborhood, and will destroy high quality parkland that cannot be mitigated.

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

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

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

There are additional financial impacts to the co-location option. If homes in Minneapolis are removed due to the co-location alternative, the tax base will be negatively impacted, affecting both City of Minneapolis and Hennepin County revenues. If freight is relocated to St. Louis Park, the impact to their tax base is far less than the impact to Minneapolis. While mitigation to the freight rail relocation is needed in St. Louis Park, the cost of purchasing dozens of home and relocating families along the Kenilworth alignment vastly outweighs the cost to mitigate the two extra trains per day that will be added to the existing Canadian Pacific owned MN & S freight line in St. Louis Park. The co-location option also requires that Burnham Road be reconstructed near Cedar Lake Road as part of the project budget, an expense that is not needed if the Locally Preferred Alternative is pursued.

#### Specific Comments (by section number):

##### 2.3.3.1

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

engineering for all other build alternatives was provided by the project sponsor (Hennepin County).

#### 3.1.2.7

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

#### 3.1.5.1, Page 3-34

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

#### 3.2.2.6, Page 3-58

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

#### 3.2.2.6, Page 3-60

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

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

#### 3.2.2.7, Page 3-61

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

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

#### Table 3.2-2

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

#### 3.6.3.3, Pages 3-117,3-118

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

#### 3.7.3.3

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

#### 5.2.4

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

#### 6.2.2.2, Page 6-24

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

significant private property taking, which is not supported by the City of Minneapolis. If Burnham Road is eliminated near Cedar Lake Road as part of the co-location option, the situation presents a significant fatal flaw. The extra response time needed for police and fire protection to use more circuitous routes adds several minutes to a rescue call; a potential matter of life and death.

#### 7.4.1.5

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

#### 11.2.5

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

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

#### Appendix H

The traffic analysis concludes that the co-location option will result in level-of service E and F during the PM peak at Cedar Lake Road/Burnham Road, a fatal design flaw.

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The acquisition of 0.81 acres of Cedar Lake Park needed to co-locate the freight rail tracks that is associated with LRT 3A-1 (co-location alternative) would constitute a Section 4(f) use. Because this Draft EIS has presented other

feasible and prudent alternatives to LRT 3A-1 (co-location alternative), this alternative cannot be recommended as the environmentally preferred alternative.”

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

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## **General Topics (Locally Preferred Alternative):**

### **Design Issues:**

#### **General Comments:**

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

- The project must pay for utility relocations beneath the proposed guide-way.
- Stations must be designed with vertical access for pedestrians and bicyclists, particularly at the West Lake Street, Penn Avenue, and Van White Stations. To meet ADA guidelines, elevators must be installed at these stations as part of the project's expense.
- All platforms must have adequate fire and police access.
- Truck access to private industrial sites must be preserved.
- Sidewalks are needed at multiple stations to connect to the existing network of city sidewalks. Substantial investment in pedestrian infrastructure will be required as part of the project budget to make the stations accessible from new and existing development and to facilitate direct bus transfers. In several cases the project will need to provide pedestrian infrastructure outside the immediate station footprint in order to connect to the nearest existing sidewalk systems.

### **Economic Effects:**

#### **Specific Comments (by section):**

##### 5.2.3

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

##### 5.2.4

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

### **Environmental Impacts/Stormwater Management:**

#### **General Comments:**

##### **Air Quality:**

The expansion of the regional transit network has the potential to have a positive impact on air quality and greenhouse gas emissions by giving travelers more options and mitigating congestion. All five cities along the corridor must make land use decisions in conjunction with

transportation improvements to provide benefits for reverse commuters and to avoid unintended impacts. The following comments pertaining to noise and vibration in addition to Energy and Climate Change are intended to improve the project.

**Tree Removal:**

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

**Stormwater:**

Mitigation will be required for adverse impacts to City of Minneapolis surface waters, storm drains, storm tunnels, sanitary sewers, and surface drainage, including but not limited to physical conflicts, pollutant loads, surface water levels, increased stormwater runoff, changes to surface drainage impacting public or private properties, or degradation of hydraulics, condition, capacity, or operational/maintenance access.

There is a 21-inch storm drain in conflict with the 7<sup>th</sup> St tunnel which will need to be relocated.

Specific Comments (by topic):

**Noise and vibration:**

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

**Energy and Climate Change:**

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

The DEIS uses a per mile coefficient to calculate energy use, but an average per passenger mile coefficient to calculate GHGs. GHGs are produced by energy production, not by passengers. The DEIS relies on a regional traffic model to estimate vehicle miles and transit miles traveled. These figures should be used as the basis for calculating emissions. The DEIS's per passenger mile figures for greenhouse gas emissions appear to be national averages, which is not an adequate assumption for application locally, especially when more accurate per-mile and per KWh figures are available. Local electricity coefficients are available from Xcel Energy and the

EPA that can provide much more accurate estimates of what a MWh of electricity used by a LRT vehicle produces in terms of GHGs than the national averages the DEIS uses. The carbon intensity of electricity varies widely across the country depending on what fuels are used to produce it, and these regional differences should be taken into account.

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

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

Specific Comments (by section):

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

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

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

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

Section 4.2.1.5 Local Cities:

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

Therefore please change FROM:

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

Please change TO:

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

Section 4.2.4 Short-Term Construction Effects:

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

Appendix H, City of Minneapolis Plans and Studies:

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

### **Environmental Justice:**

#### **General Comments:**

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

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

### **Financial Analysis:**

#### **General Comments:**

The City of Minneapolis understands there are fiscal constraints with this project and will actively work with the project office during the PE process to value engineer the scope of the project. However, it is critical that all Minneapolis stations be constructed to realize the full potential of the line. Minneapolis understands that there will need to be significant mitigation in St. Louis Park to accommodate the relocation of freight rail. It is requested that trees and landscaping (not expensive sound walls) be used to mitigate noise and vibration issues in Minneapolis.

### **Historic Preservation:**

#### **General Comments:**

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

### **Indirect Effects and Cumulative Impacts:**

#### **Specific Comments (by section):**

##### 9.6.8.2

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

### **Noise and Vibration:**

#### **General Comments:**

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

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

## **Operations and Maintenance Facility:**

### **General Comments:**

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

### **Specific Comments (by section):**

#### 2.3.3.9

The Operations & Maintenance Facility (OMF) identified four options, one of which is to be located in the North Loop Neighborhood and does not fulfill criteria used in the site selection process as described in Appendix H. Those criteria follow, along with text outlining the reasons this site does not fulfill the criteria:

- Preferred location near one end of line: The North Loop is home to the Interchange, a regional transportation hub that currently connects Hiawatha LRT with the Northstar Commuter Rail. In 2014 it will connect Central Corridor LRT to St. Paul. Southwest LRT will interline with Central Corridor LRT so consequently the identified OMF is mid-line.
- Compatibility with adjacent current and planned land uses: The adopted *North Loop Small Area Plan (2009)* projects large-scale (10+ stories) transit-oriented development for these sites that either has job or residential density in order to support the regional transportation system. This policy has been amended into *The Minneapolis Plan for Sustainable Growth*, the Minneapolis Comprehensive Plan.
- Land zoned industrial and/or light industrial: The site is no longer zoned Industrial. A 2011 rezoning study changed the zoning on the site to the B4S Downtown Services district.
- Public land: The majority of land needed for the proposed site is private and therefore costly acquisitions would be necessary. Additionally, vacating 5<sup>th</sup> Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The City of Minneapolis also has policies in its Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid. The following policies in *The Minneapolis Plan for Sustainable Growth* apply:
  - 2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.
  - 2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

#### 3.1.5.2

The Operations & Maintenance Facility (OMF) Minneapolis 4 identified to be located in the North Loop Neighborhood is not consistent with existing land uses, future land use direction, or existing zoning. While the current uses are primarily industrial, it is inaccurate to identify

adjacent land uses as compatible since the site is only separated by the 3<sup>rd</sup>/4<sup>th</sup> Street Viaduct from high-intensity residential. The 5<sup>th</sup> Street corridor where this OMF is proposed is also identified for large-scale (10+ stories) transit-oriented development in the *North Loop Small Area Plan*, which has been amended into the City's Comprehensive Plan. These properties are now zoned B4S Downtown Services district which is expressly incompatible with an Operations & Maintenance Facility. Therefore, the comment that "the facility would be permitted by the city zoning ordinance" is inaccurate.

### 3.1.8

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

### 3.2.2.7

The City of Minneapolis disagrees with the statement on page 3-61: "In general, construction of the OMF would not result in the creation of a barrier between neighborhoods, and the operation of the facility at the locations identified is not anticipated to adversely impact community cohesion." The North Loop Neighborhood is geographically bounded by the Mississippi River, Hennepin Avenue, I-394, and I-94. The location of the OMF on 5<sup>th</sup> Street North would be situated directly in the middle of the neighborhood along a corridor that is projected to have intense TOD potential due to its proximity to the Interchange regional transportation hub. The 5<sup>th</sup> Street Corridor is projected to completely transition away from underutilized industrial properties to a mix of residential, office, and commercial uses of 10+ stories. While the proposed OMF site is currently between Metro Transit properties and the 3<sup>rd</sup>/4<sup>th</sup> Street Viaduct, it is just on the other side of the Viaduct from dense multi-family housing. The City has already received development proposals for properties along 5<sup>th</sup> Street North, which is emblematic of an untapped market potential that matches the City's future land use policy guidance. Therefore, an OMF at this location would indeed act as a barrier to expansion of TOD opportunities in the North Loop Neighborhood as well as impact community cohesion by prohibiting implementation of a plan that the community created.

### 3.2.2.8

Page 3-64 - The North Loop Neighborhood is geographically bounded by the Mississippi River, Hennepin Avenue, I-394, and I-94. The location of the OMF on 5<sup>th</sup> Street North would be situated directly in the middle of the neighborhood along a corridor that is projected to have intense TOD potential due to its proximity to the Interchange regional transportation hub. The 5<sup>th</sup> Street Corridor is projected to completely transition away from underutilized industrial properties to a mix of residential, office, and commercial uses of 10+ stories. While the proposed OMF site is currently between Metro Transit properties and the 3<sup>rd</sup>/4<sup>th</sup> Street Viaduct, it is just on the other side of the Viaduct from dense multi-family housing. The City has already received development proposals for properties along 5<sup>th</sup> Street North, which is emblematic of an untapped market potential that matches the City's future land use policy guidance. Therefore, an OMF at this location would indeed act as a barrier expansion of TOD opportunities in the North Loop Neighborhood as well as impact community cohesion by prohibiting implementation of a plan that they created. Additionally, vacating 5<sup>th</sup> Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be

inconsistent with this policy. The City of Minneapolis also has policies in our Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid.

#### 3.3.3.5

In Table 3.3-3, 27 properties would be impacted for OMF Minneapolis 4, the majority of which are private property with potential for intense TOD development. The 5<sup>th</sup> Street corridor where this OMF is proposed is identified for large-scale (10+ stories) transit-oriented development in the *North Loop Small Area Plan*, which has been amended into the City's Comprehensive Plan. Not only would these 27 properties grow the city's tax base, their potential for increasing the number of housing units and jobs in the area would help support the regional transportation system.

#### 3.4.5.5

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

#### 3.6.3.3

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

#### 3.6.5.3

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

#### 6.2.2.5

On page 6-46 related to OMF Minneapolis 4, vacating 5<sup>th</sup> Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The City of Minneapolis also has policies in our Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid. The following policies in *The Minneapolis Plan for Sustainable Growth* apply:

- 2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.
- 2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

## Appendix H

The City of Minneapolis disputes the results of the Operations & Maintenance Facility Site Evaluation. The Operations & Maintenance Facility (OMF) Minneapolis 4 identified to be located in the North Loop Neighborhood does not fulfill criteria used in the site selection process as described in Appendix H:

- Preferred location near one end of line: The North Loop is home to the Interchange, a regional transportation hub that currently connects Hiawatha LRT with the Northstar Commuter Rail. In 2014 it will connect Central Corridor LRT to St. Paul. Southwest LRT will interline with Central Corridor LRT so consequently the identified OMF is mid-line.
- Compatibility with adjacent current and planned land uses: The adopted *North Loop Small Area Plan (2009)* projects large-scale (10+ stories) transit-oriented development for these sites that either has job or residential density in order to support the regional transportation system. This policy has been amended into *The Minneapolis Plan for Sustainable Growth*, the Minneapolis Comprehensive Plan.
- Land zoned industrial and/or light industrial: The site is no longer zoned Industrial. A 2011 rezoning study changed the zoning on the site to the B4S Downtown Services district.
- Public land: The majority of land needed for the proposed site is private and therefore costly acquisitions would be necessary. Additionally, vacating 5<sup>th</sup> Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The City of Minneapolis also has policies in its Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid. The following policies in *The Minneapolis Plan for Sustainable Growth* apply:
  - 2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.
  - 2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

### **Park and Ride:**

#### General Comments:

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

#### Specific Comments (by section/page):

Tables 2.3-3, 2.3-4, and 2.3-7 (station descriptions for LRT 1A, LRT 3A, and LRT 3A-1), as well as the conceptual engineering drawings in Appendix F, show surface park-and-ride lots at

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

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

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

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

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

and-ride lots proposed in the build alternatives would not be hidden by buildings. Rather, they would be in prominent and highly-visible locations at the station entrances.

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

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

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

#### **Parks and Open Space (Section 4F Evaluation):**

##### **General Comments:**

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

##### **Public Art:**

##### **General Comments:**

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

### **Social Effects:**

#### **General Comment:**

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

#### **Specific Comments (by topic):**

##### 3.3

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

##### 3.1.2

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

##### 3.1.2.4

- There are a couple of inaccurate statements in the zoning analysis on pages 3-16 and 3-17. The reference to the Minneapolis downtown zoning districts as being consistent with other Minneapolis zoning districts as it relates to land use intensity is inaccurate. The downtown zoning districts do not restrict density or height. Additionally, there is no

mention of current zoning around the Van White Station despite the inclusion of this analysis for all other stations. These sections should be amended with that information.

- The Shoreland Overlay District applies to properties within 1,000 feet of a lake or pond, not one-half mile as stated in the DEIS.

#### 3.1.2.5

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

#### 3.1.3

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

#### 3.1.3.1

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

#### Table 3.1-7

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

#### 3.1.5.2

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

### **Traction Power Substations:**

#### General Comments:

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

#### Specific Comments (by section/page):

#### 2.3.3.6 (Traction Power Substations):

The DEIS indicates that the proposed traction power substation sites shown in Appendix F “were located to minimize impacts to the surrounding properties” and that more precise locations will be selected during preliminary engineering with an effort to “meet a balance of safety, reliability, cost, and operational efficiency needs.” Improper siting of traction power substations can have a much greater impact than is stated in this language. Often the most convenient location is on publicly-owned land near a station. This is land that would be best utilized for transit-oriented development. The criteria for traction power substation site selection should include language about avoiding impacts to future development.

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

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

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

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

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

### **Transportation Effects: Traffic Impacts**

#### Specific Comments (by section):

#### 6.1.2.1

The following statement does not accurately describe transit service and ridership characteristics in the Minneapolis portion of the study area: “The type of service currently provided is reflective of the trip-making behaviors of transit users in the study area. Most are commuters making either home-based work or school trips. On weekends, transit service is available on a limited basis within the study area, and is intended to serve home-based work and shopping trips.”

#### 6.3.2.1

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

#### 6.3.2.4

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

### **Transportation Effects: Grade Separation**

#### General Comments:

The DEIS Locally Preferred Alternative shows that Cedar Lake Parkway is designed to include a bridge structure over it. This bridge needs to be evaluated further, especially with regard to added safety and traffic delay. Some of the impacts that must be addressed in the PE process include visual quality, viewsheds, traffic considerations, cost/value, groundwater constraints, trail safety, and available right-of-way. Delaying up to 11 vehicles for a period of up to 30 seconds is reasonable expectation in a built urban environment. Coordination with the Minneapolis Park and Recreation Board will be needed, as this crossing is part of the Grand Rounds, which is a National Scenic Byway.

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

#### Specific Comments (by section):

6.2.2.3, Page 6-39

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

### **Transportation Effects: Trails**

#### General Comments:

Both the Kenilworth Trail and the Cedar Lake Trail were constructed with federal transportation dollars and are built to accommodate large numbers of bicyclists and pedestrians. Over 2,000 bicyclists and pedestrians have been counted in one day on the Kenilworth Trail where it intersects with the Midtown Greenway. Both trails were built with separated paths to ensure maximum safety for both bicyclists and pedestrians and both trails were built to a 7-ton roadway standard so that maintenance vehicles would not damage the trail surface. The City of Minneapolis owns both trails and the Minneapolis Park and Recreation Board maintains both facilities.

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

All modes must be accommodated as part of this project. For example, bicycle parking facilities are needed at all stations along the corridor. Sidewalks at stations must connect to nearby neighborhood sidewalks. Station design also needs to minimize trail conflicts between bicycles and pedestrians, especially at station platforms.

## **Station Issues (Locally Preferred Alternative):**

### **Royalston Avenue Station:**

#### **General Comments:**

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

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

Bus connections to the Royalston Station must be as direct as possible. If the most direct bus transfer location is at the corner of 5<sup>th</sup> Avenue North and 7<sup>th</sup> Street North, it is imperative for pedestrians to be able to walk safely along 5<sup>th</sup> Avenue North and Royalston to the station platform.

#### **Specific Comments (by page):**

##### 3.1.7

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

##### 3.2.2.6

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

### 3.3.5

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

### 5.2.2

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

### 5.2.4

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

### 5.2.4

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

### 5.2.5.2

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

### 6.2.2.2

On the bottom of page 6-20, the closing of Holden Avenue in Minneapolis is discussed. The Royalston Station area has great potential for development as outlined in the *North Loop Small*

*Area Plan* but faces challenges to realizing the potential with connectivity barriers, namely the lack of a consistent street grid. Holden Avenue is a critical circulation piece in this challenging street system and therefore its closing needs to be mitigated by extending Border Avenue to Glenwood as consistent with the *North Loop Small Area Plan*.

#### 6.2.2.2

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

#### 6.2.2.6

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

#### 6.3.1.3

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

6.3.2.3 – On the top of page 6-58, truck access and movement issues are discussed. It should be recognized in this section that industrial businesses on Royalston Avenue could have minimized access for trucks due to turning movement constraints.

### **Van White Boulevard Station:**

#### Specific Comments (by page):

##### 2.3.3.10

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

#### Appendix F Conceptual Engineering Drawings:

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

## **Penn Avenue Station:**

### **Specific Comments (by topic):**

#### **Pedestrian access:**

Section 6.2.2.4 briefly discusses the modes of transportation that LRT riders will use to access the proposed stations. Penn Avenue is listed as a station that will be accessed via walking, biking, driving, or transferring from a local bus route. The City's objection to park-and-rides is documented elsewhere in this letter. The City views this station as primarily a walk-up and bus transfer station, in addition to biking. Data from the 2010 Census indicate that 3,576 people live within one-half mile of the proposed station. The station is also near existing and potential future employment along Wayzata Boulevard and Madeira Avenue. Without adequate pedestrian infrastructure, most or all of the station area residents and workers will be cut off from accessing the station by any means other than the Cedar Lake Trail, which does not provide convenient or even feasible access to much of the station area. Pedestrian connections that address barriers to pedestrian access should be constructed as part of the LRT project. Specific solutions to addressing these barriers will be developed during the Transitional Station Area Action Plan and Preliminary Engineering processes, but will at minimum include a high-quality pedestrian bridge with ADA-compliant vertical circulation connecting Wayzata Boulevard pedestrians to the station platform, as well as a connection from the platform to Kenwood Parkway.

#### **Bus transfers/transit connectivity:**

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

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

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

## **21<sup>st</sup> Street Station:**

### **General Comments:**

The City of Minneapolis recommends that a split platform be examined at this location as part of the Preliminary Engineering process to minimize needed right-of-way and to minimize pedestrian crashes.

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

### **West Lake Station:**

#### **Specific Comments (by topic):**

##### **Connection to Midtown streetcar:**

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

##### **Pedestrian circulation and bus connections:**

Tables 2.3-9, 2.3-10, and 2.3-11 summarize the major changes that would be made to the bus operating plan for each build alternative. These proposed changes, while preliminary, will be very important for integrating existing transit service with LRT and for expanding the LRT customer base beyond West Lake Street station walkshed. The City of Minneapolis strongly supports seamless transfers between LRT and high-frequency buses. These transfers will only work if necessary pedestrian infrastructure is provided as part of the LRT project. At the West Lake Street Station, routes 17, 21, 25, and 53 will need to stop on the Lake Street bridge over the LRT/trail corridor in order to provide convenient and visible access to the LRT platform. This requires modifications to the Lake Street bridge as well as the provision of stairs and elevators on both sides of the bridge. This condition would be similar to the West Bank LRT station and the 46<sup>th</sup> Street and 35W BRT station. Some buses may also need to access the station via Abbott Avenue South and West 31<sup>st</sup> Street. The design of any bus stops or drop-off areas on the street adjacent to the platform should minimize impacts to future development and allow for safe and inviting pedestrian movement through the area.

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

## **Required Action:**

### **Mitigation:**

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

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

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

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

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

- All five (5) proposed stations in Minneapolis are essential to the success of the line. Removing any of the stations from the scope of the project will deny the benefits of the project to low income and minority populations identified in the diagrams shown in the Environmental Justice Chapter. The Royalston and VanWhite stations are adjacent to higher concentrations of minority populations and the Penn Avenue, 21<sup>st</sup> Street, and West Lake stations are adjacent to higher concentrations of low income populations.