

University of Minnesota Stadium

Draft EIS Comments

For submittal as a *DRAFT* on November 23, 2005 by the City of Minneapolis (rev. 1:30 PM on Nov. 22, 2005)

Comment Number	Section	Page	From Top of Page		Comment/Proposed Change/ Remark
			Paragraph	Line	
1					<p>On March 11, 2005 the Minneapolis City Council approved RESOLUTION 2005R-124 authorizing a Letter of Agreement between the City and the University of Minnesota regarding environmental review of a proposed Gopher Football Stadium. The Resolution is incorporated into these Draft EIS Comments by reference. Included in the Resolution were the following: The Board of Regents has affirmed guiding principles concerning a stadium, which include the principle to “promote physical and programmatic integration with the Twin Cities campus community and adjacent neighborhoods”; and that “any stadium on campus will be designed, constructed and operated in a manner that is compatible with the University campus environment, master plan and the commercial and residential neighborhoods near the stadium site;” and “the University will seek to accommodate and respect the community and neighborhood needs during the planning process;” and “in accordance with its commitment to an open and inclusive planning process, the University will engage in a dialogue about stadium options with the University community, adjacent neighborhoods, local businesses, and other public agencies.”</p> <p>Further, the Resolution designated appropriate City staff to participate in the Technical Advisory Group, to in particular review the anticipated impacts on or opportunities for the City and adjacent communities arising from the stadium project and to share their analysis and suggestions with the University, particularly as it relates to parking, traffic flow, land use, transit, air quality, lighting, noise, identification of alternatives, game day activities and economic impact.</p>

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2					On March 15, 2005 the City of Minneapolis and the University of Minnesota entered into a Letter of Agreement Regarding Environmental Review of Proposed Gopher Football Stadium. The Letter of Agreement is incorporated into these Draft EIS Comments by reference. Included in the Agreement are the following: Ensure that issues regarding the responsibility for infrastructure cost and construction are understood by the parties for the purposes of environmental review, the University will obtain the City's approval with respect to such items as changes to City streets and alterations and realignments of sanitary sewer, storm sewer and water line connections, the University will pay all infrastructure costs that result from its construction of the stadium in the event the proposed stadium project moves forward to construction, including the costs associated with improvements or changes to the physical infrastructure owned by the City, and the University will pay all City utility fees for the stadium site at standard rates as set pursuant to City Ordinance.
3	1.0 and 3.1	4 and 19		Figure 3, Figure 5	Temporary 6 th Street should not be built. West Granary is recognized in both the SEMI plan and the Stadium EIS as the long-term solution to providing access in this area. The University is about to acquire the Reichold property, upon which much of West Granary is to be constructed. Minneapolis and the University should therefore be able to construct West Granary by the time the Stadium is completed.
4	1.2	4	Figure 3	key	Orange labeled street (Oak Street) indicates the city will construct a street in 2006. This is incorrect. The City and the University need to finalize the location and elevation of the Granary Road / Oak Street Intersection before any design can be initiated. The City currently has this intersection as a raised intersection to enable a bridge crossing over the railroad tracks to the North. This orange line should not be shown until agreement is obtained or shown as a future street.
5	1.2	4	Figure 3	key	Solid purple line identifies streets that the city will construct in 2006. This is incorrect. The City does not own the right-of-way for these proposed street locations and needs to obtain it. No right-of-way procedures have been started and no design can be finalized without the needed right-of-way. The solid purple line should be changed to show a proposed future location of Granary Road and 25th Avenue.

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6	2.1.1	8	Alternative Sites		The EIS offers a no-build option as the only alternative to the stadium location as proposed. This limited position leaves the City and the neighborhoods with little room for a dialogue about the project. The City would like to work with the University in developing a stadium project that meets the needs of the University but is located such that it does not have a negative effect on the surrounding community. Providing input on the choices of "build or no-build" does not reinforce an iterative process that helps to build a project that works for all.
7	2.2.1	10	Anticipated Types and Frequency of Use		The City is aware of other, non-University related uses such as stadium-sponsor TCF's twice yearly option to use it for corporate events. The University needs to allow neighborhood influence into the decision-making for proposed events. The long-term implication is that while today, with the current administration, there may be a good faith intention to use the stadium only in ways that will be minimally intrusive to the surrounding neighborhoods, long-term there is no such guarantee. The University needs to explain to what degree it will use the stadium for non-football events, conduct the relevant analyses, determine any impacts and propose appropriate mitigation.
8	2.2.1	10/11	Anticipated Types and Frequency of Use	all	The U will be allowed to hold large cultural and other sporting events (rallies, concerts, high schools, etc.) which may occur weekdays and may be frequent in nature. An analysis is required of how and when these will occur such that appropriate impacts can be determined. The inference is that these decisions will be made later and that appropriate mitigation will be addressed is not appropriate for the purpose of the EIS. These impacts need to be stated and committed to now.
9	3.0				Why does the EIS not include 2030 level of service results for a weekday football event?

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10	3.1	12	Transportation and Parking		Charts in this section consistently show significant increases in congestion at intersections. There can be no question that the existence of the new stadium will significantly impact the area. Charts for 2009 Saturday games show the intersection at Oak and University degrading from a B-status to an E-status at game start, and degrading from a B-status to an F-status at game completion. Similar degradations occur at Fulton and Huron and 27th and E. River Road/Franklin. Twenty-one years later in 2030, the charts are very similar, indicating that negative traffic impacts to the neighborhood will continue far into the future.
11	3.1	12	3/4	all	The overview presented of the 18 scenarios is not defined enough to gauge the entire depth of the analysis conducted. Please list the 18 scenarios to clarify.
12	3.1		3	bullet points	The bullet points use the term "sports event". Does sports event equal U football game or another sports event? Likewise the term "Stadium event" is cited. Does Stadium event mean a U football game or some other level of event? We understand that there are approximately 8 U football games each year with up to 50,000 people in attendance, and that these are usually highly planned and mitigated events. However, it is not clear what the true threshold of the transportation system will be for non U football games, whether full capacity events or less than capacity events, and what their impacts are and how they will be mitigated.
13	3.1.1	12	last	2	The term "event traffic" is used and the term "event" is repeat later. These terms are not defined anywhere in the EIS. What constitutes an event?
14	3.1.1	12	4	2	The Project was initially proposed to open in 2008 and thus requires a 2009 (one year after) traffic analysis. Since the Project timeline has been delayed to 2009 opening, then the traffic analysis needs to be conducted for 2010. This results in corrections through out the EIS.
15	3.1.1	12	last	4/5	The sentence "Analysis of the East Bank Campus includes access to and from TH 280, I-35W and I-94." should be correctly stated to read "The East Bank Campus area analyzed in this EIS is bounded by TH 280, I-35W and I-94." Note -- the subsequent paragraphs detail the exact locations of analyses.

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16	3.1.1	13	first	4/8	The "event" analysis focuses on arrival traffic. Not defining the event makes it impossible to determine whether departing traffic may be more critical.
17	3.1.1	13	2	6/9	Please present the data/analysis that supports the state of existing Levels of Service.
18	3.1.1	13	5	1/3	Provide a statement as to why this analysis is needed (e.g. - to gauge the implications of the changed Project roadways on various existing traffic conditions.
19	3.1.1	13/14	last/first	bullet points	Bullet points 2,3,4,6 & 7 are stated with no basis of this assumption. What are the sources of these assumptions?
20	3.1.1	13/16	Basketball event section	all	Why is this info in Section 3.1.1 when other traffic analyses are located in Section 3.1.2?
21	3.1.1	14	2	1/3 & 12/13	A SCOOT system is assumed to be implemented prior to the Project opening. The pretense of the traffic analysis relied heavily on SCOOT operations. The City's SCOOT timeline is operational in 2011. Therefore, the City will not have SCOOT installed by 2009 unless the Stadium Project advances the construction. What will the traffic analysis results be without SCOOT or will the Project make SCOOT a mitigation measure?
22	3.1.1	14	3	1	The EIS places a heavy reliance on Minneapolis' installation by 2009 of a "SCOOT" system (p. 14) that would use real time data to regulate traffic signals. The EIS should provide information on this new system's reliability.
23	3.1.1	14	1	1	EIS notes that Saturday events use only daytime start times. In 2005 the Gophers had two evening games. Future media and school contracts could dictate evening games.
24	3.1.1	14/15	pg 14 - 3 & 4, pg 15 - 1 & 2 , Table 1	all	Intersections 13, 23, and 24 are three modified Project intersections. Due to the unacceptable LOS E/F conditions, how will these three intersections be mitigated to address these impacts?
25	3.1.1	15 +	Tables 1-5		Based on presentations made to City staff, a pedestrian walk time assumption of 4 feet/sec was used. This assumption is aggressive in the City given the pedestrian mix and the actions taken by pedestrians at events.
26	3.1.2	16	1	varies	See page 12 comment as well. The term "Stadium event" is used. The inference is U football game or capacity event but this is not defined.

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27	3.1.2	17	1	all	Please cite the other key roadway changes -- 1) removal of the transitway and rerouting of buses, 2) removal of 5th Street/parking lot access roadway and 3) deletion of Washington from University to Huron. All of these need to be clearly stated and not inferred from the small Figure 3.
28	3.1.2	17	2	7/12	The last sentence cites "The model includes the effects of" What were the methods and means to gauge whether the regional model includes the effects of all of these elements? What information will be presented to determine this?
29	3.1.2	18/19	Figures 4/5	key	The solid black line indicates 2009 Proposed Roadways. The Oak Street, 25th Ave., and Granary Road sections shown in solid black should be shown as dashed lines.
30	3.1.2	19	figure 5	map	The intersections and parking labels are not aligned on the map.
31	3.1.2	21	1	5/8	How will the LOS E condition be mitigated?
32	3.1.2	21/22	last/first	bullet points	Bullet points 2,3,4,6 & 7 are stated with no basis of this assumption. What are the sources of these assumptions?
33	3.1.2	22	first	bullet points	Bullet points 8 & 9 cited assumptions for parking and traffic distribution. Please present the data that support these statements and document the distribution.
34	3.1.2	22	2	3/4	The statement about 4 lanes to 2 lanes for Washington Avenue is only true for portions west of Church Street (near the Washington Avenue Bridge and points west). What assumptions have been taken regarding Washington Avenue operations in 2030? Please correct and provide more information.
35	3.1.2	22	3	5/6	The assumption that all non-ticket holder stadium users will park remotely or be dropped off is not correct. These individuals by nature will park as close as possible and some will come with parking privileges. Please determine this impact to the traffic and parking analyses.

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36	3.1.2 and 4.1	23-25; 118		11; 9	The traffic analysis for Saturday 2009 event conditions acknowledges that the various intersections will operate poorly and below an acceptable level of service. However, the mitigation proposed in Section 4.0 states that a Event Manager position will be established who will then use the bullet point list of mitigation strategies to try to solve the problem at that time. The mitigation strategies for traffic management section needs to give greater detail about how the application of those strategies will mitigate the negative traffic situation expected for the intersections listed above. The poor performance of these intersections will directly affect the quality of life in the area.
37	3.1.2	23	1	all	See comment regarding SCOOT.
38	3.1.2	23	table 3		The 11am-12 noon results at intersections 24, 38, & 41 do not make sense given the quantity of both off-street and on-street parking in the vicinity. Likewise, the 3:30 to 4:30 pm results at intersections 41 & 44 are also questionable (i.e. Fulton/Huron will be LOS F inbound, but only LOS C outbound?)
39	3.1.2	23	table 3		Future EIS sections present general mitigation to traffic impacts. However, these general mitigation impacts are not specific enough to gauge their value. Likewise, there are no goals set regarding what the intended mitigation/TDM measures will accomplish.
40	3.1.2	25	4	2/4	See page 17 comment regarding the 2030 Regional model.
41	3.1.2	27	table 4		As for the analysis for a Saturday event in 2009, the traffic analysis for Saturday 2030 event conditions acknowledges that multiple intersections will operate poorly and below an acceptable level of service. However, key intersections such as the entrance and exit ramps from 4th Street SE to I-35W are shown to operate at an acceptable level of service. The text of the section states that the performance of these intersections is better in 2030 because future Granary Park Drive will be a reliever of some of this traffic. If the University is using future Granary Park Drive to mitigate stadium traffic through the area, the University should build or assist in funding of Granary Park Drive to connect to I-35W as a means for providing a reliever for stadium traffic.

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42	3.1.2	27	table 4		Future EIS sections present general mitigation to traffic impacts. However, these general mitigation impacts are not specific enough to gauge their value. Likewise, there are no goals set regarding what the intended mitigation/TDM measures will accomplish.
43	3.1.2	27	table 4		It appears that a number of the intersections have improved LOS from 2009 to 2030 (i.e. intersection #5 goes from LOS D to B). While there is a general statement in the text about Granary Road providing some relief, it is not clear how such LOS improvement is being obtained given the expected traffic volume increases.
44	3.1.2	28	3	1/2	See page 14 comment regarding SCOOT.
45	3.1.2	29	1	5/6	Statements about number of vehicles cannot be understood or confirmed from the presented analysis. Vehicle generation and distribution analysis is needed.
46	3.1.2	29	Table 5		For Weekday 2009 event conditions, the traffic analysis show that the various intersections operate poorly and at unacceptable levels during a weekday football event. However, the mitigation proposed in Section 4.0 states that a Event Manager position will be established who will then use a bullet point list of mitigation strategies to try to solve the problem at that time.
47					The mitigation strategies for traffic management section needs to give greater detail about how the application of those strategies will truly help to mitigate the negative traffic situation expected for the intersections listed above. The poor performance of these intersections will directly affect the quality of life in area and neighborhoods, on event days.
48	3.1.2	29	Table 5		For intersection #6 I-35W/NB On-Ramp/4th Street SE, the level of service for the departure is listed at B. If the level of service for arrival for this intersection for the Off-Ramp from I-35W is listed at F, then wouldn't the level of service for departure for the On-Ramp to I-35W be consistently poor as well?

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49	3.1.2	31	Year 2009 Build Roadway Weekday Football Event Departure Peak Hour		This section states: "Scheduling of a game on a weekday will present significant transportation challenges due to the increase in delay and the impacts to the regional and local roadway systems. However, scheduling of a weekday event will be known at least a year in advance allowing adequate time to design and implement a customized traffic management plan. No identified mitigation plan is presented that will address these impacts. More mitigation details and commitments should be stated in the EIS.
50	3.1.2	31	Year 2009 Build Roadway Weekday Football Event Departure Peak Hour		"This plan will require a level of pre-planning effort similar to a Super Bowl or Final Four event...." The neighborhood needs to learn more about this. How often does the University plan to hold weekday games, under what circumstances, etc. A Super Bowl, after all, is a significant undertaking (see previous comment.)
51	3.1.2	31	3	2/3	The "involved cooperative efforts" should include the State Fairgrounds area agencies.
52	3.1.2	31	4/5	all	Numerous assumptions have been made as to where buses will or will not park or stage on area streets. It should be noted that use of streets will require approvals and fees. 23rd Avenue is assumed for Transitway buses. The charter bus drop-off area is assumed to be located on University Avenue. These areas may needed to be used for traffic or other purposes. Bus parking should be located off-street in the U surface parking lots. In addition, the West Bank Shuttle buses are stated for drop-off/pick-up at the parking ramp on University. Is this off-street? Should the University's Walnut Street extension be used for buses? Did the traffic operations modeling analyses include these bus staging assumptions? If so, how was this done? More detailed bus parameters are needed to gauge their impact on the transportation system.
53	3.1.2	32	2	7/8	Shuttle passenger numbers are stated but no analysis is presented as to how they were calculated.
54	3.1.2	32	3	1	The first sentence does not make sense.
55	3.1.2	32	3	4/5	Bus numbers are stated but no analysis is presented as to how they were calculated.

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56	3.1.2	32	5	2	25th Street is 25th Avenue. What is described here is a long-term trail routing given that Granary Road is built. Unless the Stadium Project intends to build all of Granary Road between these two points (which is not proposed) then the bike trail has not been realigned. Please provide a trail route (interim or permanent) given that Granary Road will not be built in a timely manner.
57	3.1.2	32	last	6/7	Traffic control personnel are cited to be used to direct traffic. If City's traffic control personnel are requested for event management, the City will charge a fee to recover the costs.
58	3.1.2	33	2	8	Pedestrian routing assumptions are referred to but not documented. Please provide the assumptions such that appropriate review can be conducted.
59	3; 4	33; 118-119	3.1.3; 4.1		The parking analysis assumes that all persons arriving by car will park in the pay University parking system and not in the neighborhoods for free. Given that the total University parking system has approximately 23,000 spaces spread over multiple geographic locations, this is an unrealistic assumption. Spillover parking is of great concern to the city and the adjacent neighborhoods. Section 3.13 states that the University will work with the city to enforce local ordinances regarding neighborhood parking; however Section 4.0 Summary of Mitigative Measures does not address how spillover parking within the neighborhoods will be mitigated. The EIS needs to include a detailed plan for how this situation will be mitigated.
60	3.1.3	33	3.1.3	Table 6	904 proposed parking spaces are shown to be developed through potential property acquisitions; however, the location of the potential properties to be acquired are not specified. More detail on where the additional 904 spaces would be developed needs to be given in the EIS.

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61	3.1.3	33; 93	3.1.3; 3.81	1	Surface and ramp parking development is proposed along University Avenue SE to provide additional parking spaces for the stadium. University Avenue SE is a designated Community Corridor in the city's comprehensive plan and that calls for active commercial and residential uses along the corridor. Developing surface and ramp parking along the University Avenue SE corridor without other uses does not help to support a lively, pedestrian environment. Parking facilities should be designed to include attractive, commercial development so that the land use along the corridor provides activity, security and a pleasant pedestrian experience. All University parking facilities being developed for the stadium should comply with the standards and requirements of Chapter 530 Site Plan Review, Minneapolis Zoning Code Ordinance.
62					Stadium Village is a designated Activity Center and the hallmark of an Activity Center is having a wide range of housing, commercial, entertainment and office uses present in an area as well as mix of uses within buildings that encourage activity all day and into the evening. All development for the Stadium Village area, including the stadium, should incorporate a mix of uses to ensure that the area remains lively 365 days a year.
63	3.1.3	33	all section 3.1.3		The location of parking will predict how traffic distributes and operates. Likewise, the supply of parking will determine transit and other mode choices. The mode share choice followed by the parking generation/distribution analysis then the trip generation, trip distribution and traffic volumes should be presented before the EIS traffic analyses. This will define the appropriate supporting data and assumptions prior to making any analyses, conclusions and recommendations. In addition to the lack of parking data, the trip generation data is limited, the trip distribution data does not exist, and the traffic volume data does not exist, all of which contribute to the incomplete status of the EIS.

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64	3.1.3	33	3	6/7	The Project site will add 1,657 spaces (2,898-1,241) to the site. These additional parking spaces are listed in Table 6, but do not show up on Figure 3. Table 6 presents various parking lot names that are unidentified in the EIS mapping. Table 6 also cites potential property acquisitions but indicates no locations. It is not clear if these parking spaces are within the Project limits or not. Therefore, it is impossible for EIS reviewers to determine any assumptions or impacts related to these additional parking spaces. All parking assumptions and locations should be clearly identified and presented.
65	3.1.3	33	last	4	Change the last phrase from "neighborhood parking" to "neighborhood on-street parking and illegal off-street parking lots."
66	3.1.2	34	figure 7		The pedestrian routings do not tally to 50,000 stadium seating capacity. Why is this?
67	3.1.3	35	1/2, Table 7, Table 8	all	The location of parking will predict how traffic distributes and operates. Likewise, the supply of parking will determine transit and other mode choices. The number of parking spaces are cited with not enough information to gauge its accuracy and viability. Parking data is incomplete, a more detailed accounting is needed to effectively comment and review the EIS analysis. For each parking ramp or surface lot, the raw supply of parking spaces, the available supply and the event spaces used should be identified and tallied (not just the area locations presented in Table 7).
68	3.1.3	35	last	1	Change the last phrase from "shown in Table 8, a weekday football event" to "shown in Tables 7 and 8, a Saturday and weekday football events."

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69	3.1.4	36	Mitigations Measures: Non-Event Weekday conditions.		According to this section, by 2030 the "new intersection of University Avenue/Huron Boulevard/23rd Avenue is expected to operate poorly by that time...." The proposed mitigation measure is to develop a "Travel Demand Management (TDM) Plan" and to hire an Event Manager. This statement suggests there are traffic problems for which there are no answers and the response is to make a bullet point plan (see P36) consisting of traffic signs to direct traffic and propose a position to manage the problem. The EIS needs to suggest a reasonable and formally defined strategy. One example may be a bridge linking Granary Road with Kasota allowing traffic to flow to and from Hwy. 280 without further congesting University Avenue/Huron Boulevard/and 23rd Avenue to minimize congestion.
70	3.1.4	36	2	6/10	The statements about resolving the 2030 LOS problems are not clear. Clearly state the mitigation measures and the benefit gained. Clearly state the reasons for not taking action now versus later.
71	3.1.4	36	between 2 & 3		No mitigation documentation is presented for the future roadway scenarios without a stadium football event that include other on campus events (e.g. basketball, hockey, Northrop Auditorium, etc.). Because the roadway system will be changed and Table 1 cites basketball impacts to three intersections, then mitigation is needed to address the existing traffic to be accommodated on the modified roadway system. Likewise, no documentation is presented regarding the future roadway scenarios with a stadium non-football event. (See above page 10/11 & 12 comments.)
72	3.1.4	36	3	title	The "Stadium Events" term is used. Is this only football events or all Stadium events?
73	3.1.4	36	4	1	At the beginning of this paragraph, add the following: "The University of Minnesota is well aware of the existing and future challenges to manage traffic related to all University events. As such, the University recognizes that effective event coordination, communication and management are needed within the University and with its partnering agencies and area communities."
74	3.1.4	36	4	3	delete "Stadium" and replace with "all"
75	3.1.4	36	5	5	delete "consider". The EIS must declare what mitigation will be taken and not just considered.
76	3.1.4	36	5	bullet 1	change Using to Use

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77	3.1.4	36	5	bullet 2	change Using to Implement
78	3.1.4	36	5	bullet 3	change Employing to Employ
79	3.1.4	36	5	bullet 4	change Installing to Install, add phrase at end "with local agency approvals"
80	3.1.4	36	5	bullet 5	change Communicating to Communicate, add phrase at end "and establish a web-based Event information source"
81	3.1.4	37	1	1	delete "consider". The EIS must declare what mitigation will be taken and not just considered.
82	3.1.4	37	1	bullet 1	change Using to Use
83	3.1.4	37	1	bullet 2	change Establishing to Implement
84	3.1.4	37	1	bullet 3	change Distributing to Distribute
85	3.1.4	37	1	bullet 4	change Positioning to Locate
86	3.1.4	37	1	add bullet 5	add "Provide for football event parking enforcement on neighborhood streets and illegal parking lot operators"
87	3.1.4	37	2	3	delete "consider". The EIS must declare what mitigation will be taken and not just considered.
88	3.1.4	37	2	bullet 1	replace with "Implement bus service and provide appropriate staging areas (scheduled, charter, and shuttle) to meet the needs"
89	3.1.4	37	2	bullet 2	change Providing to Provide, add phrase at end "such as dual ticket/transit purchases"
90	3.1.4	37	2	bullet 3	change Promoting to Promote, add phrase at end "similar other transit advantages"
91	3.1.4	37	2	bullet 4	change Installing to Install
92	3.1.4	37	3	5	delete "consider". The EIS must declare what mitigation will be taken and not just considered.
93	3.1.4	37	3	add new bullet 1	add "Design the Stadium Project infrastructure including landscape, fencing, bollards, etc. to effectively allow for flexible methods that provide safety barriers and control points for pedestrians."
94	3.1.4	37	3	existing bullet 1	change Directing to Direct
95	3.1.4	37	3	bullet 2	change marking to mark
96	3.1.4	37	3	bullet 3	change Future to Consider future

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97	3.1.4	38	Provide Travel Demand Management Incentives		This section outlines a plan to provide "incentives for taking transit, carpooling, biking or walking...." A stadium event parking is expected to be a significant revenue stream for the University. If that is the case, how will the University create incentives to not drive and park, but take alternative modes?
98	3.1.4	38	0	bullet 4 from top of page	change "Stadium" to "Stadium and other event"
99	3.1.4	38	2	2	change "Stadium" to "Stadium and other"
100	3.1.4	38	3	9	The City supports the concept of a University-wide event management effort. However, the 50,000 attendee limit of all events has not been documented as the threshold. In fact, the 50,000 stadium event results in unmitigated impacts. Likewise, a basketball capacity event as noted in Table 1 presents unmitigated impacts. Therefore, further analysis would be needed to effectively set an attendee threshold for all campus-wide events such that appropriate mitigation measures take place. The University should develop an iterative modeling process to accomplish event management through past and future data collection of event attendees, traffic, and parking that further enhances an ITS traffic/parking management and information system.
101	3.1.4 and 4.1	38, 39 and 120	Assemble Stadium Advisory Committee		On page 39 the document includes a suggestion that "For the first year of stadium operation, the University will create and periodically convene a group made up of representatives of the adjacent communities, to identify, and advise on, event-day community impacts." The University should establish a permanent stadium advisory group that will include representatives from the surrounding neighborhoods and the business community.
102	3.1.4	39	n/a	add new bullet	Add new bullet under Saturday - East Bank that reads "A Traffic Signal System Operator should be employed to monitor and adjust the central computer traffic signal timing during the football and other events"
103	3.1.5	41	2/3	all	These paragraphs confirm that non-football events will be held at the Stadium. Likewise as noted in pages 10/11 and 12 comments, the traffic and parking analysis does not fully determine the threshold impacts and any mitigation associated with these non football events.
104	3.2.2	48	5	2	See page 12 comment about year 2009 versus 2010 analysis year.
105	3.2.2	49	1	1	change Traffic to Noise

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106	3.2.2	56	Build (year 2009 and year 2030)		Traffic noise modeling in this section makes the assumption that quantifying traffic noise impacts is a simple matter of counting automobiles. People behave differently leaving a football game (yelling, honking, racing engines, loud car stereos with open windows) than they do driving home from work and that difference in behavior needs to be considered in understanding noise impacts to the surrounding communities. How will the EIS address this concern?
107	3.2.2	57	3/4	all	Noise analysis for a weekday football event can and should be consider for two reasons: a) an evening game departure time will be from 10-11 pm during the nighttime conditions when noise thresholds are lower and vehicle speeds should be higher due to less background traffic, and b) the vehicle speeds can be reasonably estimated and placed in the noise modeling efforts to gauge the relative and comparative impacts to the posted speed analyses.
108	3.2.3	57	5	5/6	The Saturday football game traffic noise is compared to the weekday pm peak hour traffic noise. While this is an interesting comparison, the appropriate comparison should be the No Build Saturday condition.
109	3.2.3	57	Traffic Noise Mitigation	6, 7	State Rule 7030.0030 NOISE CONTROL REQUIREMENT. No person may violate the standards established in part 7030.0040, unless exempted by Minnesota Statutes, section 116.07, subdivision 2a. Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use. EIS reports that traffic will increase noise but that no mitigation will occur because it is only 8 days out of the year. The number of events does not include other uses of the stadium.
110	3.2.4	59	3	5/6	Is the afternoon rush hour truly 6:23-7:24 pm?
111	3.2.4	59	3	9	What early evening rush hour are you speaking about?

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112	3.2.4 Event - Noise	62			The EIS reports that the increased noise levels attributable to concerts are below human perception (<3dB) or substantial (>5dB). Because of the nature of the sound, different than background, it will be perceptible to the human ear and become obtrusive to the residents in the area and be deemed a public nuisance under MCO 389.65. Public nuisance noise. Professional concerts, unless an afternoon matinee, typically are not likely to end before 10 p.m. and will exceed the nighttime standards that take effect after 10 p.m. of L ₁₀ 55 dBA and L ₅₀ of 50 dBA.
113	3.2.5. Event Noise - Mitigation	63			State Rule 7030.0030 NOISE CONTROL REQUIREMENT. No person may violate the standards established in part 7030.0040, unless exempted by Minnesota Statutes, section 116.07, subdivision 2a. Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use. Levels from Game Day and Concert noise are identified as exceeding State Standards. Mitigation of the noise is to "Line Array" the speaker settings. The EIS does not state that the Line Array will make noise from Events compliant with state rules or specifically identify the reductions that would be achieved.
114	3.2.5	64	1	3	Why are the 7 am to 10 pm hours cited?

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115	3.2.5 - Noise Mitigation	65	7	1	Minneapolis outdoor amplified sound permits are required regardless of the time. 389.105. Permits for sound amplifying equipment. Except as provided in section 389.60(e)(5), no person shall use or maintain any outside sound amplifying equipment without first having obtained a permit from the Pollution Control Section of the Inspections Division, Department of Regulatory Services. Athletic contests are exempt under 389.60(e)(5) - Lawful and properly permitted organized athletic activities on school grounds, and officially designated playgrounds used for recreation by children under supervision, and parks or places wherein athletic contests take place between the hours of 8:00 a.m. and 9:00 p.m.
116	3.3 Air Quality	70	3		The EIS looked at the six major criteria pollutants from the standpoint of increased vehicular traffic. Only carbon monoxide required modeling, and the EIS concluded that CO concentrations will be below the state one hour and eight hour standards. It is not identified if traffic volume increases were related to stadium events or area growth. If traffic volume increases did not account for increases related to event traffic the result would be increased emission impacts for 1+ hours during arrival and departures. Traffic modeling that was done underestimated traffic volume by using attendance average of 14,625 versus average football game attendance of 47,352 that the University reported in 2001. Air quality impacts should account for event related traffic and should utilize attendance figures for football. To assess for worst-case scenario, no background reduction factor was used for future emission control improvements. This same worst-case scenario should be used in calculations of CO levels at area intersections.
117					The EIS notes, "Improvements in fuel and vehicle technology...combine to produce lower emission rates in 2030 than in 2009." Using worst case scenario emissions rates will increase in 2030 as compared to 2009 if such improvements are not accounted for as a result of increased traffic from growth. Increases for emissions may result in non-attainment for CO during events.
118	3.4.2	72	5	all	Removal of 4th Street from University/Huron to Oak Street due to the Stadium building will result in, at least, the realignment of City electrical and stormwater utilities.

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119	3.5 (all), 4.3		4,5,6,7,8,9	all	It appears that the EIS stormwater management plan was prepared without much consideration of the SEMI/University Research Park stormwater management plan. The two systems should be integrated or the EIS should better describe why not.
120	3.5.1	72	8	1	What does regulated by the Mississippi Watershed mean?
121	3.5.2	76	8	1	City Stormwater Standards are not predicated on matching existing but no increase over pre-developed conditions. As the City is mostly paved no increase over existing provides no improvement, our ordinance and NPDES permit look for water quality improvement and a reduction in runoff.
122	3.5.2	77	Table 21	Water Quantity	Add "No increase over pre-developed conditions for the 2, 10 and 100 year event using a curve (CN) 60. 100 year c=0.32, 10yr c=.20, 2 yr c = 0.10. Protecting Water Quality in Urban Areas calls for .10 to .20 depending on the soils."
123	3.5.2	77	Table 21	Water Quality	Add "70% TSS removal NURP Standards."
124	3.5	81	2nd column from left	all	The EIS is not clear regarding the University's intent to comply with Minneapolis stormwater regulation standards. The EIS should describe if and/or how the University will comply with Minneapolis regulations.
125	3.5.3	82			Storm water Management would need to be built into the project specifications as required by MCO CHAPTER 54. STORM WATER MANAGEMENT. 54.50. The EIS states, "... storm water design will match future drainage patterns to those of the existing patterns as closely as possible in an effort to maintain existing peak discharge rates..." The purpose of storm water management is to decrease the amount of runoff, the rate of runoff and the improve the quality of the runoff, not to maintain existing. MCO 54.20 states Purpose. The purpose of this ordinance is to minimize negative impacts of storm water runoff rates, volumes and quality on Minneapolis lakes, streams, wetlands, and the Mississippi River by guiding future significant development and redevelopment activity, and by assuring long-term effectiveness of existing and future storm water management constructed facilities.

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126					Chapter 54 establishes standards and specifications for conservation practices and planning activities in order to achieve policies regarding water resource management, flood control, and other community services as described in city, regional, state, and federal documents and statutes. (99-Or-156, § 1, 11-24-99)
127	3.5.3	83	3	1	Pervious or grass pavement should be used as an alternate surface for providing emergency vehicles and pedestrians access as a means of reducing stormwater run off.
128	3.5.3	85	6	1	Underground Detention while effective as a means of obtaining water quality has high initial cost, and long-term maintenance needs, which make this a less than best management practice. We recommend using fewer underground storage units and more regional-type ponds. Integrating the ponds into the landscape can provide for an amenity while still achieving water quality.
129	3.5.4	86	10	1	The scope of this project will provide the opportunity for meaningful stormwater quality and quantity improvements.
130	3.6.1	88	figure 12		This map does not provide enough background information to adequately define the investigation area boundary. Please add other elements such as streets, property lines, aerial photo, etc. that will allow for reviewing entities to comment.
131	3.6.1	89/90	89-all, 90-1/3	all	The former Creosoting Facility is discussed but is not located in description or in Figure 12. To better understand any impacts, please identify all of the former potential contamination facilities on Figure 12 so that reviewers can follow and comment.
132	3.6.1	92	3		Summary comments should note that regardless of the approved course for action for addressing existing soil contamination: 1). Air monitoring will occur on site for identified contaminants and dust. 2). Any impacted soils that are excavated will be covered to prevent storm water runoff. 3). Any grading or excavation through impacted soils will be done as to prevent any storm water from leaving the site to area storm drains.

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133	3.6.1	92	3		It is suggested that a specific response action to ground pollution doesn't appear to be required. The basis for this conclusion however, isn't entirely clear. It was noted that the results of testing showed that a "vast majority" of the impacts were below risk levels appropriate for industrial sites. However, it would therefore appear that some are above the risk levels for industrial sites. Also, a stadium to hold spectators is not an industrial site. It was noted that arsenic concentrations ranged to a high of 130 ppm and that generally the screening value for residential use is 5 ppm. How does this lead to the conclusion that no response action will be required?
134	3.8.1	93			The Draft EIS is inadequate in its discussion of the Minneapolis Comprehensive Plan without a discussion of the performance policies as well as the locational policies that address the stadium. These policies are found in Chapters 3, 4, 6, 8 & 9.
135	3.8.2	97	Mitigation Fund		The University is offering a one-time net sum of \$500,000 for stadium mitigation. This money will be managed by the University but will be available to the surrounding communities to "mitigate adverse impacts caused by the operation of the Stadium." The City appreciates the University's contribution, but would like to further discuss whether this amount is reasonable compensation for the degrading effects of the stadium on the surrounding community. Likewise, it is unclear how this funding will be used and how ongoing, yearly impacts will be addressed.
136	3.8.2	96	Mitigation section		The University should be responsible for any event they sponsor or require any private event to restore the area to pre-event conditions such as provide clean-up of debris associated with the event, litter and debris from tailgating, litter and debris on area streets, etc. Any commercially provided food or concerts should obtain the necessary City permits.
137	3.8.4	99	4	all	This Environmental Consequence speaks to the need for a University-wide event management system. (see page 36 comments.)

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138	3.9.1	100			Lighting of the stadium, auxiliary areas and "spill-out" must be in conformance with City Zoning requirements.
139	3.9.1	100	5		The report concludes that "Overall, the technical analysis concluded the lighting levels generated by the proposed stadium lighting system will not adversely impact the surrounding uses." It's not clear what the factual basis is for this conclusion. It is also not clear whether this analysis included concerts.
140	3.10.1	101			For construction activity that exposes contaminated soils or results in stockpiling of contaminated soils onsite the following mitigation measures need to occur: 1). air monitoring for identified contaminants must occur. 2). Storm water runoff must be prevent from leaving the site and entering area storm drains, 3) soils may not be tracked offsite.
141	3.10.1	103	3	15	The draft document talks about limiting the hours of operation for pile driving to the period from 7:00 a.m. to 9:30 p.m. and restricting it on Sunday. Minneapolis has restricted pile driving beginning at 6:00 p.m. and on Saturdays when it is taking place in a residential neighborhood. Therefore, if it is determined that pile driving will have an impact on residential neighborhoods, query as to what the appropriate restriction would be.
142	3.10.1	103			Hours for construction activity are limited; M - F from 7 a.m. to 6 p.m. An after-hours work permit is required from the City of Minneapolis when construction or demolition equipment is to be operated within the city between the hours of 6:00 p.m. and 7:00 a.m. on weekdays or during any hours on Saturdays, Sundays and state and federal holidays.
143	3.10.2	104			An erosion control permit and storm water management permit are required by the City of Minneapolis.
144	3.10.4	105/106	last/first	all	The rerouting of the Transitway after Project completion is not clear. Please define the Transitway's infrastructure and service changes.
145	3.10.4	106	2	all	See page 32 comment.
146	3.10.6	107			A permit is required from the City of Minneapolis for discharge to the City sewer systems (storm and sanitary).
147	3.11.2	112			Appropriate sections in the Cumulative effects sections need to be updated based upon earlier comments.
148	3.11.2	113			Minneapolis Storm water Management permits (MCO Chapter 54) requirements exist.

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149	3.11.3	113	4	4/5	See SCOOT comment
150	3.11.4	114	5	1	See SCOOT comment
151	3.11.4		5	all	This is not true. Table 2 cites LOS E in 2030 at one intersection without a Stadium football event. Also, there are no data provided that would suggest that a non-football event at the Stadium does not result in traffic and/or parking impacts (see comment on page 10/11 and 12 above). In addition, data are not presented to assess Granary Road's contribution to the 2030 traffic analyses.
152	3.11.4	114			Minneapolis Storm water Management permits (MCO Chapter 54) requirements exist.
153	4.1	118/121	all	all	Section 4.1 appears to be a repeat of Section 3.1.4 on pages 36 to 39. Note the above comments for 3.1.4 above also apply to Section 4.1.
154	4.2	121	2	33	The document notes that noise levels in adjacent residential neighborhoods during concert events will exceed State noise standards for both daytime and nighttime conditions. The document suggests certain mitigation techniques but doesn't suggest operational rules or restrictions to ensure compliance with the State Noise Table. Obtaining a variance may solve the regulatory problem but would not solve the noise problem.
155	4.2	122			Specify in contractual agreements that concert staff are responsible for obtaining all permits (amplified sound, food, beverage, liquor, etc.)
156	4.3	122	5	15	While there may be a need for significant hard surfaces to convey pedestrians and vehicles, the document fails to discuss alternative techniques for conveying pedestrians and vehicles without using 100% impermeable surfaces. This would include the use of pervious pavers, various kinds of gravel surfaces, and other surfaces for pedestrians, and in some cases, vehicles.
157	4.3	122	7	27	The document talks about runoff from impervious surfaces being directed into landscape and other pervious surfaces to allow for some degree of infiltration, filtration and rate attenuation. Discussion of the use of on-site retention basins, whether wet or dry, should be more extensive.

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158	4.6.3	124			Hours of construction activity are limited M - F from 7 a.m. to 6 p.m. An after-hours work permit is required from the City of Minneapolis when construction or demolition equipment is to be operated within the city between the hours of 6:00 p.m. and 7 a.m.
159	4.6.4	124	3	33	The City of Minneapolis also has an erosion control ordinance. This erosion control ordinance is a result, in part, of the City's obligations in regard to managing City stormwater pursuant to the City's NPDES permit.
160	4.6.4	124			Storm water runoff, erosion or tracking of soils from exposed or stockpiled contaminated soil is not permitted.
161	4.6.8	125			Any discharged water must be permitted by the City of Minneapolis
162	6.0	129	chart	city section	Add "Lane Use Obstruction Permits" to the list
163	6	129			Add to local list Noise, Amplified Sound, After-hours work, well, soil or groundwater remediation, food, liquor, water discharge to storm drain or sanitary sewer. Amplified sound, Food and Liquor licensing are related to use of the stadium.
164	General Comment	On event days there will be more traffic, more noise, more parking congestion, more litter, etc. Below are some impact mitigation strategies and neighborhood improvement strategies that should be considered.			
			Impact Mitigation Strategies:		
			o Early and on-going planning input into all proposed stadium uses		
			o Strict guidelines for noise, light, traffic, air quality and other environmental impacts		
			o University funds mitigation initiatives		
				▪ Parking stickers & signage	
				▪ Trash collection	
				▪ Part-time neighborhood stadium administrator/coordinator	
				▪ Game-day parking enforcement	
				▪ Stadium complaint hotline	
				▪ Ongoing mitigation fund	
				o Annual funding linked to stadium revenues (ticket sales, concessions, parking, etc.)	

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					◦ Funds to be used for ongoing improvements and unforeseen mitigation requirements
					◦ Ongoing neighborhood role in Stadium Management (Perhaps similar in makeup to SAAG committee)
					▪ Event calendar to be reviewed by neighborhood
					◦ Incentives for using public transit such as including a bus coupon with each ticket and making on site parking expensive and preventing neighborhood or illegal parking
					Possible Mitigation/Improvement Strategies:
					◦ Construction of a bridge linking 27 th or 29 th Street to Kasota Avenue
					◦ Funding for University Avenue strategic planning and development guidelines
					◦ Neighborhood/University collaboration in planning for Central Corridor LRT
					◦ Improvements to University Avenue streetscape
					◦ Aggressive stadium jobs program targeting area residents
					▪ Could include both construction jobs & operations jobs
					◦ University sponsorship or collaboration on high-quality, market rate mixed-use development on University
165	General Comment		We asked for additional detail or emphasis in four areas:		
			1. Better Definition of the Project		
					a. What activities or events in addition to Athletic events are proposed the stadium?
					b. What commercial activities are proposed as part of the stadium and how will these activities contribute to the EIS impacts (traffic, etc.) and how will they compete with or complement the nearby business districts?
					c. A better definition of the site of the stadium and parking areas.
			2. A discussion of the relationship of the project to the goals and objectives of the Comp Plan		
			3. Better analysis of the storm water impacts		
					a. Rate of flow
					b. Quality of the runoff
					c. Quantity of the runoff
			4. Detailed traffic analysis		
					a. During multiple events and the various stadium events
					b. On the functioning of the 4th St. University pair especially at the Huron Blvd location
					c. At the connections with the interstate system.

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166	General Comment			The primary purpose of the stadium is athletic events, Bruininks' statement of need, pg 5. Other events are not described, only the Regent's policy to permit them, page 10, is offered. That policy provides no clarity about what the University is proposing or committing to hold for events.
				The Draft EIS goes on to discuss what happens when a major spectator event occurs outside the normal Saturday football game and occurs on a weekday, when the stadium could be used as an outdoor amphitheater for a concert event.
				The significantly increased negative impacts of moving from Saturday daytime Football spectator events to weekday concert events is illustrated for traffic and congestion in Tables 4 and 5 on pages 27 and 29, for Air Quality in Table 20 on page 70, parking and for noise in Tables 17 and 18 on pages 61 and 62. While not exceeding specific regulatory standards, they will be noticeable and will affect normal use and enjoyment in the surrounding neighborhoods.
				The EIS should include mitigation that includes an Event Management Committee with University, City, County and State agencies that provides this group decision making power to regulate the traffic management strategies for all events proposed by the University. This would result in the event themselves being responsible to fund the necessary measures to mitigate any traffic impacts.
167	General Comment			Overall, the City considers the transportation and parking section significantly incomplete that lacks key information and data to effectively comment and review the analyses. Likewise, additional transportation and parking analyses are needed to address the other 357 days (365-8) of the year when U football is not being played at the Stadium, but other stadium events will be held.
168	General Comment			It is the City of Minneapolis' understanding that the moving of State Aid Streets will be at the University of Minnesota cost including all penalties and paybacks.
169	General Comment			The University should work with Minneapolis (cost share) to jointly plan and construct infrastructure that is proposed for both the Stadium and the SEMI/University Research Park. The EIS should evaluate potential cost savings that may result from efficiencies of constructing planned infrastructure in a more coordinated manner. The University's proposed construction, and subsequent demolition, of 6th Street is an example addressed more specifically above. Additionally, the October 24, 2005 draft EIS describes only one short portion of West Granary Road as roadway to be built by the University because it is needed for the Stadium. The EIS dismisses the Oak extension, 25th Ave construction and remainder of Granary as roads that were to be constructed by the City regardless of Stadium construction. These roadways will nonetheless be needed for the Stadium and the University should work with the City to ensure their cost effective and timely construction.

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170	General Comment				The University reported that a reason the University and Vikings were not able to agree on a joint stadium was the certainty that it would be used for a wide range of activities and much more frequently than a facility built only for the University. One of the concerns was loud events that had little to do with the University's mission. Though the EIS has not evaluated non-concert events the evaluation of concerts begs the question regarding numbers of concerts and other events that may be scheduled and their relationship to the University's mission.
171	General Comment				The University plans to eventually construct additional research related buildings on property east of the MRI building that is now programmed for parking. Minneapolis recommends that the EIS recognize this probability and address how replacement parking and transit will be provided to meet Stadium events.
172	General Comment				The draft Stadium EIS does not recognize a final alignment of the Central Corridor transit system. It in fact precludes implementation of the plan that is being evaluated. This issue must be resolved prior to approval of the EIS.