The City of Minneapolis Twins Ballpark recommendations and detail comments are as follows.

1. Traffic Analysis and Other Transportation Analysis

Recommendations:

That the City of Minneapolis strongly encourage the Minneasota Ballpark Authority to further research the feasibility of the mitigation measures described in the DEIS and actively work to implement all feasible mitigation measures.

A traffic management plan (TMP) addressing needed mitigation and identified resources is essential to facilitate operation of the ballpark as well as circulation in this critical area of the City of Minneapolis. The plan should include an Event Transportation Manager as well as a Ballpark Transportation Coordinating Committee (BTCC) to ensure adequate implementation of the TMP.

2. Noise

Recommendation:

That the City of Minneapolis recommends when special events occur, those events should be over by 10:00pm unless a PCA variance is sought.

3. Air Quality

Recommendation:

The City of Minneapolis encourages Hennepin County to identify a method to address potential garbage truck debris, whether through reduction of debris or picking up around the perimeter of the HERC Facility. The City of Minneapolis also encourages Hennepin County to continue to work to improve and identify new technologies to reduce HERC odors.

4. Visual Impacts/Scenic Views

Recommendation:

The City of Minneapolis strongly encourages an enhanced design of the exterior ballpark walls to break long walls up into sections using a variety of materials at pedestrian level, open areas to look into the ballpark, and a well designed 6th Street bridge plaza.

5. Cultural Resources/Construction Related Impacts/Cumulative Impacts

Recommendation:

The City of Minneapolis believes it is critical to implement a communication plan with the Northstar project and Ballpark construction to reduce construction conflicts and keep the neighborhood residents and businesses informed of weekly construction activities.

6. Site Contamination

No specific recommendation.

7. Cover Types/Soil Conditions

No specific recommendation.

8. Land Use Regulations

No specific recommendation.

9. Surface Water Quality

Recommendation:

Storm water management must conform to Title III, Chapter 54 of City code and shall conform to the requirements of Resolution 2000R-042.

10. Impact on Public Services/Water Use/Wastewater
No specific recommendation.

11. Designated Parks, Recreation Area, Trails
Recommendation:
The City of Minneapolis strongly encourages Hennepin County to identify direct at-grade space for the Cedar Lake Trail through the Ballpark site.

12. Ballpark Operations
No specific recommendation.

In addition to this summary, specific comments are as follows.

City of Minneapolis Twins Ballpark Detail Comments

Glossary

		In the glossary, the discussion of nitrogen dioxide describes it as a “reddish-brown gas with a pungent and irritating odor”; however, in the discussion of nitrogen oxides – the next item in the glossary – both nitrous oxide and nitrogen dioxide are described as “nonflammable and colorless.”

Purpose and Need

Section 1.1	P 1-3	In Figure 1-2 (p. 1-3), both 5th Street North and 7th Street North are shown on the map east of Hennepin Avenue, where they are actually 5th Street South and 7th Street South.

Traffic Analysis and Other Transportation Analysis

Section 3.1&2	General	Transit: Because of its unique location, the Twins ballpark has the potential to become a premier transit hub in the region. If marketed aggressively, those transit services can help greatly mitigate traffic and parking problems and enhance the fans experience. Supplemental transit services for high attendance events (i.e. above 30,000 fans) should also be contemplated.
Section 3.1&2	General	A, B, C ramps modifications: Entry/exit capacity enhancements and upgrades to the current revenue collection methods can increase access/egress vehicle flow rates. Also removal of I-394 bottleneck for vehicles exiting the ramps would improve vehicle flow.
Section 3.1&2	General	Traffic management: An event traffic control plan, an event traffic signal timing plan and the location of traffic control agents at key intersections and parking ramps access points can help keep traffic and pedestrian flow under control. Conversion of 2nd Ave N from one-way to two-way operations could also mitigate impacts.
Section 3.1&2	General	Pedestrians: non-street level pedestrian connections between the Ballpark and the ABC ramps, increased sidewalk width, improved way finding and traffic control officers at key intersections and ramp exits.
Section 3.1&2	General	Information/Communication: Way finding for vehicles, pedestrians and bicycles and visitor information on different transportation options, particularly on the Twins web site, can mitigate impacts
Section 3.1&2	General	Bicycles: Abundant and secure bicycle lockers and easy connections from key bicycle routes can encourage a higher bicycle use
Section 3.2.3	General	Combined affect of pedestrians and vehicles is not adequate. Recommend further analysis in final EIS.
Section 3.1 & 2	General	For the vehicle analysis of each scenario, the operation of the intersection of 2nd Ave N & 5th St N is shown as level of service (LOS) D or better. This result is questionable considering that there are five different vehicle movements handled (WB 5th, EB 5th left turns, Ramp B exit, NB 2nd, and LRT), the anticipated high level of pedestrian activity just 1 block from the ballpark, and this being the only exit from Parking Ramp B onto the local street network.

Section 3.1 & 2	General	It is believed that the background pedestrian traffic levels (and possible vehicle traffic levels) are significantly under-estimated in both the vehicle and pedestrian models for Friday and Saturday evenings, particularly along 1st Avenue North. The Minneapolis Police Department has characterized the pedestrians as a "state fair type activity level", routinely leading to closing a portion of 1st Avenue North around 11 PM due to excessive pedestrian levels spilling into the streets. The pedestrian simulation showed that event pedestrians overwhelmed other pedestrian activity, leading to significant traffic problems; therefore, the argument could be made that the background pedestrian level doesn't matter. On the other hand, the vehicle model did not reveal the same magnitude of problems, yielding what are believed to be unrealistic and over-optimistic results.
Section 3.1 & 2	General	Unlike earlier versions, the DEIS now contains a simple statement that impacts may extend east of Hennepin; however, the possible extent of these problems is not addressed.
Section 3.1.1	p 3-5	It is believed that Metrodome area parking for events at the new ballpark is over-estimated, and parking at locations closer to the new ballpark (such as the Convention Center) are under-estimated and this consideration could improve pedestrian movement closer to the site due to the desire to add sidewalk width at 7th St N and 6th St Pedestrian Plaza
Section 3.1.2	P 3-7	In the last paragraph it is stated "I-394 provides access to 10th Street N….". Because there is no access to 10th Street from I-394, it is believed that "12th Street N." was the intended street name.
Section 3.1.2	P 3-8	In Figure 3-2 (p. 3-8), there is no intersection numbered 34. To be consistent with the related tables (3-4 through 3-8), the intersections in the figure which are numbered 35 through 40 should be numbered 34 through 39, respectively.
Section 3.1.2	P 3-21	In response to the dual event section, there are other venues near the ballpark (e.g. theaters) which could attract substantial numbers of attendees at times which coincide with Twins games. In those conditions it may be necessary to implement the mitigation strategies necessary for the dual-capacity events in order to maintain acceptable traffic operations.
Section 3.1.3	General	Freeway capacity volumes are believed to be high in this particular area due to curves and the number ofentrance and exit ramps. These volumes should be reviewed prior to the final EIS so when discussing mitigation measures realistic numbers can be used.
Section 3.1.4	P 3-31	In the last paragraph on p. 3-31 it is stated "The analysis assumes that parking fee transactions will be collected upon entry and the exit gates will be open after the event." For weekday afternoon events, this assumption ignores the day-to-day operation of the A/B/C/HTC ramps, in which visitors receive a ticket upon entering and pay, when exiting, an amount based on the duration of their stays. The impact on parking operations needs to be discussed in greater detail.
Section 3.2.3	P 3-47	The fifth intersection in the bulleted list should be 6th Street N. & 2nd Avenue N.
Section 3.2.3	P 3-49	All scenarios should identify impacts at 2nd Ave N and 5th St N and at 2nd Ave N and 7th St N and are not mentioned in document.

Noise

Section 3.3.1	General	The City of Minneapolis has adopted the State Rule Chapter 7030 Noise Pollution Control into local ordinance Chapter 389 Noise and enforces it locally in addition to other noise control requirements in MCO 389.

Section 3.3.2	P 3-62	It is stated within the 2nd paragraph on page 62 that traffic noise is expected to increase .5% over the four year period from 2006-20100- is there a reference, such as a conversation from MnDOT, that we can place here? .5% may seem like such a low number on expected growth and it may help the common reader to have a reference of some sort.
Section 3.3.3	Figure 3-10	The modeling is very good however, the anticipated noise level drop from the baseball stands (85-90dB) to immediately outside and west-southwest of the building (55-60dB) illustrates a 30dB swing in attenuation. This would mean a greater than 4-fold drop in noise levels which then translates to much lower noise levels at NSA3. While it is understood that modeling takes into account shielding from the bleachers and adjacent structure, a reader with an understanding of noise propagation and the related logarithmic nature of the decibel may question this.
Section 3.3.3	P 3-68	Within the 3rd paragraph is the only reference to PA speakers and the noise they may make within the noise section. This is the final sentence which states that a "detailed speaker placement plan had not been developed for the project". While it is understood that during the process of this report, there are no PA systems design nor any understanding of how a concert scenario may affect noise to surrounding areas, there should at a minimum, a one paragraph discussion on making sure that these scenarios should be accounted for at a later date- such as with the contracted AV installation company. It is the responsibility of contracted installers and Ballpark management to take these scenarios, and the related noise they may make, into account when planning future uses of the ballpark. This is essential (raising the issue) in addressing what is sure to be future questioning from the surrounding neighborhoods.
Section 3.3.3	P 3-68	The EIS states activities from the stadium will only be operating between the hours of 7 a.m. and 10 p.m. Evenings baseball games that into go into extra innings, playoff games, special events and activities associated are likely to extend past the 10 p.m. Preparation and clean up activities also will likely start, on occasion, before 7 a.m. Clean up and closure of the stadium after an evening game or event will likely extend past 10 p.m.

Air Quality

Section 3.4.2	General	The document is not clear why nitrogen oxides (NOx) are excluded from the Risk Assessment. NOx impacts are compared with ambient air quality standards, but the acute risks associated with inhaling nitrogen dioxide (NO2) are not included in the acute risk summaries (Section 3.5.2.4, page 3-17, and Tables 3-32, and Table 3-32).
Section 3.4.3	General	A monitoring report for year 2006 was not made available. Therefore, the data for year 2006 presented in the DEIS evaluation could not be verified. Based on 2005 data, there does not appear to be much reduction in the number of days garbage odor was observed on the proposed Twins Stadium property between 2005 and 2006, even though changes in the HERC facility were proposed for 2006. Were the changes proposed in March 2006 made, and does the data reflect no significant improvement in odor control?
Section 3.4.3	General	On page 4 of the "Comparison of 2004 and 2005 Odor Monitoring Data" document, garbage truck debris is cited as a potential source of garbage odors around the perimeter of the property. However, the "2006 Action Plan" on page 7 does not include any actions to address garbage truck debris. Is any action proposed to reduce garbage truck debris?
Section 3.4.3	General	Encourage the county to continue to manage HERC odors and to have them work to reduce garbage deliveries on game days.

Visual Impacts/Scenic Views

Section 3.5.1	General	Lighting from an evening game or event will likely extend past 10 p.m. for games that go into extra innings, playoffs or special events. In addition, no accounting for lights remaining on while the crowds depart and the stadium is closed after and event. If clean up after a game or event occurs after it has completed some level of lighting will be on to accommodate these activities.
Section 3.5.1	P 3-80	In the second paragraph of the lighting report, the measured lighting levels at a 3-foot plane are described as "luminance levels". I believe this should read "illuminance levels" which is very different from luminance levels.
Section 3.5.1	General	There no discussion (except in the mitigation section) regarding glare. Glare is a product of insufficiently shielded light sources within the field of view and is typically of more concern than the horizontal footcandle levels (illuminance) that have been measured and estimated for this report. Glare is what you see when you look at the light source and is measured by aiming the light meter directly at that light source. Illuminance levels (horizontal footcandles) are measured by always aiming the light meter straight up. I would expect to see an estimate of maximum lighting levels (glare) for any sports facility, and more discussion of glare mitigation. Mitigation of glare should be the greatest lighting concern for this project.
Section 3.5.1	General	Its very good that most lighting will be incorporated in the roof design. Only one large light standard is planned in the outfield area.
Section 3.5.2	General	Its difficult to comment on visual impact of the stadium in the neighborhood when color elevations have not been released/seen.
Section 3.5.2	General	Good to have the long walls broken up into sections using other materials, including glass and open areas to look into the ballpark. We hope to see more visual interest for pedestrians (lowest 8 feet of the ballpark) on the 7th and 5th Street sides of the ballpark. We also hope that the 6th Street bridge plaza can be finished with streetscaping for an attractive space on non-game days.

Cultural Resources

Section 3.6	General	It is critical that a strong, coordinated communication plan be implemented with the North Star project to reduce construction conflicts & keep the neighborhood residents & businesses informed of weekly construction activities. Its vital to keep the North Loop and warehouse district accessible and open for business during the long construction period, and also on game days in 2010 and beyond!

Site Contamination

Sections 3.7	P 3-93c	The DEIS references a Response Action Plan (RAP) submitted to the MPCA,(Page 3-93c) a copy of this should be made available for review.
Section 3.7	P 3-93c	The final EIS should incorporate the approved RAP (or draft RAP if not yet approved).
Section 3.7	General	Copper is/was a common industrial chemical and has been used for railroad tie preservation (copper sulfate). It appears the soil was not tested for copper, was this considered during the environmental investigation?
Section 3.7	General	All fill brought to the site must be clean fill. Contaminated or unregulated soil generated from the site cannot be reused on the site without obtaining City of Minneapolis Environmental Services, MCO 48.250.
Section 3.7	General	Storing of contaminated soil on site or the installation of a remediation system requires local permitting, MCO 48.300 and 48.240
Section 3.7&10	General	All ground water or storm water that is to be discharged to local storm or sanitary sewer systems requires City of Minneapolis Environmental Services, MCO 50.
Section 3.7	General	The removal or abandonment of underground storage tanks requires City of Minneapolis Environmental Services, MCO 48.130.

Section 3.7&11	General	Geotechnical section found on page 3-92 to 3-94. In this section, it is indicated that various contaminants, including arsenic, mercury, lead, and polyaromatic hydrocarbons have been found in concentrations exceeding the regulatory thresholds. This should be taken into consideration in the design of the water main in terms of remediation of soils at a distance from the proposed water main determined by concentration and potential for transport by groundwater conditions. Special joints and /or gasket design may be a further consideration to be investigated. The presence of groundwater at water main depths (perched or otherwise) should in particular be considered in the design of the main in light of any contamination that may be found near the proposed alignment.
Sections 3.7&8	General	The discussion related to Site Contamination and Cover Types/Soil Condition was complete and so far as those impacts relate to City systems the mitigation for the preferred alternatives were acceptable.

Cover Types/Soil Conditions

Sections 3.8&10	General	Design of any proposed water quality treatment methods relying on infiltration will need to take into consideration techniques for dealing with the significant amount of clay soils, in order for infiltration to be effective.

Land Use Regulations

Section 3.9.2	General	The project is found to be consistent with the City of Minneapolis comprehensive plan and permitted land use.

Surface Water Quality

Section 3.10	General	The Surface Water Quality section was general because specific system conditions cannot be modeled until the final project design is developed. The applicant acknowledged the City and Watershed requirements for runoff load reduction and rate reduction. Due to the potential presence of contaminated soil over much of the site, specific volume reduction is not possible until further specific geotechnical investigations are conducted.
Section 3.10	General	This document does not acknowledge City Erosion Control requirements in Title 3, Chapter 54 of City Code. Since final plans have not been developed, reference to compliance with the City erosion control requirements should be included in the Surface Water Quality section.
Section 3.10	P 3-102&3	Regarding water used to wash down seating area after games: If discharged to the storm drain system, how will Mississippi River aquatic organisms be protected from food and drink compounds carried in the water? If discharged to the sanitary sewer system, how would the City of Minneapolis be shielded from fines for clear water flows?
Section 3.10	P 3-102	The Storm Water Management Plan (Minneapolis Code of Ordinances Chapter 54) must include an operations and maintenance plan.
Section 3.10	P 3-101&2	**T**he following two sections (Pages 3-101 “Stormwater Management Requirements” and 3-102 “Mitigation”) of the DEIS refer to two different stormwater treatment standards for the site/project as required by MPCA and the City of Minneapolis. We suggest that the DEIS clarify what the more restrictive standard is and state that the most restrictive standard will define the ultimate treatment system requirements. As mentioned in previous comments, and if the 70% TSS removal standard is to be used as the ultimate design basis, we also request that the DEIS clarify the particle size distribution that will apply to this standard.

Section 3.10	P 3-102	Operation of the Ball Park seating area will involved the production of contaminated storm water runoff such that open discharge to available storm drains will not be permissible. Re-use or reclamation may be required as an alternative to discharge to the sanitary sewer system. Runoff or other wash water contaminated beyond the ability to be openly discharged to the storm drain system and where discharge to the sanitary sewer system is warranted, such discharge will have to be metered separately and deferred to off peak flow periods.
Section 3.10	P 3-101	Rerouting of public drainage system….. Existing twin box culvert conduit runs through the northern edge of the Ball Park Site. Conduit is owned and operated by the City of Minneapolis with Jurisdiction of the runoff flows being that of the Basset Creek Water Management Organization. Structural support controls pursuant to the requirements of both entities will be required for the construction of the Ball Park on or around the box culvert conduit.

Impact on Public Services/Water Use/Wastewater

Section 3.11.1	P 3-104	The City has indicated in general terms that it is reasonable to assume that the public water system has adequate capacity to provide service to the ballpark. - however, the City does NOT make express guarantees of this. As has been previously indicated, it is incumbent upon the developer to perform engineering studies, including fire flow tests, to verify that the needs of their development can be met.
Section 3.11	General	No mention of access and Right-of-Way to the existing and proposed utilities. This section should guarantee acceptable permanent unrestricted access to existing utilities whether or not those utilities are relocated. The access shall be protected by permanent easements or other documents approved by the City. Private utilities relocated as a result of this project shall similarly be protected by permanent easements.

Designated Parks, Recreational Area, Trails

Section 3.12	P 3-106&107	Encourages Hennepin County to identify a space for the Cedar Lake Trail

Ballpark Operations

Section 3.13.3	P 3-108	Installation and operation of any above ground or underground storage tank(s) requires permitting and registration by the City of Minneapolis Environmental Services, MCO 48.120, 48.125 and 48.130.

Construction Related Impacts

Section 3.14.1	P 3-108&109	The City of Minneapolis permits construction work 7 a.m. to 6 p.m., Monday – Friday. A work permit is required for the operation of construction, demolition or commercial power maintenance equipment 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, MCO 389.70.

Cumulative Impacts

Section 3.15	General	Continue coordination with adjacent projects to minimize impacts.

Permits and Approvals

Section 5.0	P 5-1	Connecting to tunnel/construction activity over the tunnel indicates approval is needed from Bassett Creek Flood Control Commission and US Army Corps of Engineers. Add that approval to the City of Minneapolis is also to be applied for

Section 5.0	P 5-1	Stormwater management plan approval indicates approval is needed from Middle Mississippi River Watershed District. This is incorrect. Change to indicate that approval by the City of Minneapolis is to be applied for. (Incidentally, the actual name of the organization is Mississippi Watershed Management Organization.)
Section 5.0	P 5-1	Add Utility Connection Permits to the list of City of Minneapolis permits to be applied for
Section 5.0	P 5-1	Add Erosion & Sediment Control Permit to the list of City of Minneapolis permits to be applied for
Section 5.0	P 5-1	Add that submission of permit application for any MCES direct connection must be submitted to the City of Minneapolis Collection System Operator for submission to MCES
Section 5.0	P 5-1	Project is adjacent to MnDOT Right-of-Way. Additional permits than those listed may be required from MnDOT