

### **Overall Comments:**

- **Mode choice:** Consistent with adopted policy of the City of Minneapolis to stimulate development along major transit corridors, the Business Development division of Minneapolis Community Planning and Economic Development prefers LRT over BRT due to the significantly greater development and place-making opportunities associated with light rail. Light rail is a fixed investment. Routes will not be altered or eliminated. The limited studies that have been conducted by such groups as the Center for Transit Oriented Development and conversations with area developers indicate that developers perceive light rail as creating substantial opportunities for investment, whereas the market response to Bus Rapid Transit is tentative and less ambitious.
- **Document organization:** Add a project description section, with detailed maps and descriptions of the alignment and station areas.
- **New information:** Much of the background information is dated (e.g. 1999 Fortune 500 rankings) and has been “overtaken by events” (Guthrie and Downtown Minneapolis Library have been constructed and Twins and Gopher Stadium proposals have recently been approved by the Legislature ). This can color the reviewer’s impression of the value of the substance of the report. The background information needs to be updated.
- **Ridership Assumptions:** Please re-evaluate the TAZ data that is being fed into the regional model. New housing in Downtown Minneapolis and near the U of M has been constructed in the last 5 years that has far outpaced original projections due to market demand. Plugging these new values into the regional model will improve ridership and will improve the cost-effectiveness index.

### **Summary**

- **Page S-4 (Section 2): Purpose and Need for Action** Five Concerns listed to justify the need for a transit system should be increase to six and include “Energy”. Transit systems have been shown to have a large role in creating a cleaner atmosphere. In addition, transit systems offer a more efficient use of our limited energy resources.
- **Page S-5 (Section 3.1): Baseline Alternative** The baseline alternative is not clearly defined. Please provide a one to two sentence definition at the beginning of this section.
- **Page S-8 (Section 4.1): Social Effects** The baseline paragraph “the Minneapolis Plan...” should be changed to “the Minneapolis Comprehensive Plan...”
- **Page S-12 (Table S.4-1): Environmental Effects** “Energy Consumed vs. Baseline” should reference Table S.4-3 for further clarification of value stated.

### **Chapter 1 - Purpose and Need:**

- Page 1-13 (Section 1.4): Transit System Linkages Other Projects should include the “Northeast Diagonal”.
- Page 1-16 (Section 1.5): Outreach Techniques State the website address, the newsletter name and number of publication, etc. Clarify and quantify the methods used.
- Page 1-19 (Section 1.6): Role of Draft EIS This section should be stated at the beginning of section 1.

### **Chapter 2 – Alternatives Considered:**

- Page 2-6: EIS Alignment Table 2.3-1 is located in section 2.3.2. Move up to section 2.3.1.
- Page 2-11: EIS Alignment Table 2.3-2 is located in section 2.3.3. Move up to section 2.3.2.
- Page 2-17 (Section 2.4.1): Soft Costs
  - a) It is not clear what the 30 % is under the Engineering and Administration for infrastructure improvements is. Please clarify.
  - b) It is not clear what the 5% is under the Engineering and Administration for vehicles is. Please clarify.
  - c) Please clarify % stated under the Contingencies also.

### **Chapter 3 – Social and Land Use Impact Analysis:**

- Cultural resource management: There needs to be more detail on the Area of Potential Effect. It appears that some properties are missing from the NRHP listed and eligible table. Minneapolis City Hall is not listed. The IDS tower, the Minneapolis Club, the Northwestern National Life/ING building, and possibly other downtown structures are eligible for this designation. The 1995 study recommended these structures for eligibility, as well as the Minnesota Transfer Railway in St. Paul, which is listed as needing Phase II review. More detail is needed for a review of potential impacts to cultural resources.
- Page 3-8: Comprehensive and Small Area Plans. The DEIS needs to include more detail on the land use policy features from the Minneapolis comprehensive plan. University Avenue SE and Cedar Avenue are designated Community Corridors meaning that higher-density mixed-use development would be supported in conjunction with transit along those corridors. The University of Minnesota/SEMI area and Downtown Minneapolis are designated Growth Centers in terms of both population and employment. The SEMI area is a designated Industrial Business Park Opportunity Area, an area that the city seeks to redevelop for uses which provide high-paying jobs and greater job density. Stadium Village and Cedar-Riverside are designated “Activity Centers” meaning they have a higher intensity of mixed-use, are heavily pedestrian-oriented, and

offer a range of activities that extend from the day into the evening. University Avenue SE & Bedford Street SE is a designated Neighborhood Commercial Node which provides small-scale, neighborhood-serving retail oriented to the pedestrian.

- Page 3-8 - 3-9: Comprehensive and Small Area Plans. The DEIS needs to reference the Southeast Minneapolis Industrial (SEMI) Refined Master Plan (adopted in 2001) and the Downtown East/North Loop Master Plan (adopted 2003).
- Page 3-12: Major Activity Centers. The University of Minnesota's proposed Gopher stadium needs to be added to the list of Major Activity Centers.
- Page 3-13: Consistency with Local Plans and Impacts Related to Land Use. The DEIS does not include how the Central Corridor project is consistent and/or inconsistent with the Southeast Minneapolis Industrial (SEMI) Refined Master Plan (adopted in 2001) or the Downtown East/North Loop Master Plan (adopted 2003).
- Page 3-48: Impacts Related to Visual/Aesthetic Conditions. The LRT alternative proposes a complete rebuild of University Avenue but does not indicate whether the mature boulevard trees existing on the Minneapolis portion of University Avenue would be retained. Retention of the existing, mature boulevard trees is important in enhancing the visual appearance of the area and is important to the Prospect Park East River Road neighborhood.
- Page 3-52: Cultural Resources. The small section on Historic Resources offers little to review. The Station Areas should note the APE (area of potential effect) and directly comment on the affected cultural resources with plans and photographs. All affected cultural resources must be identified, photographed and documented. At this time, the Cultural Resources documentation is inadequate and staff cannot analyze the impact or mitigation without further information on the station plan, track design and affected historic resources.

## **Chapter 5 – Economic Impact Analysis:**

- Page 5-1 (Section 5.1-1): Existing Economic Activities and Developments: Page 5-1: An update Table 5.1.1 is needed: Hormel Foods are not headquartered in the Twin Cities but in Austin Minnesota; it's likely that Northwest Airlines position in the Fortune 500 ranking of corporate revenues has slipped significantly and others must have changed.
- Page 5-2: Central Corridor The list of Central Corridor development projects on page 5-2 needs to be updated to reflect newer projects.

- Page 5-8: Station Location Selection. A change in the location of the West Bank station could better serve the University of Minnesota, the Cedar Avenue Community Corridor and the Cedar-Riverside Activity Center if it were located closer to Cedar Avenue. Businesses along Cedar Avenue would benefit from having a stop closer to this corridor as the commercial parking supply is limited. Transit riders would gain safety and security benefits from having a stop closer to a hub of pedestrian-oriented activity that extends into the evening.
- Page 5.9: (Section 5.2.2): Transit-Oriented Development (TOD) Analysis:  
General: Station site evaluations are very subjective. A quantifiable measure of infill potential, redevelopment potential and overall TOD rating should be provided.
- Page 5-12: Downtown East Station  
Update to acknowledge the new Guthrie Theater and Performing Arts Center as a major trip generator, as well as the adoption in October 2003 of the Downtown East Master Plan. Please acknowledge the recent transformation of the downtown Minneapolis Warehouse District for residential, office and cultural uses.
- Page 5-13: West Bank Station  
The station location for the West Bank should be relocated to the area between Cedar Avenue and 19<sup>th</sup> Avenue. The proposed location within the West Bank campus area reinforces the University's isolation from the Cedar-Riverside neighborhood and misses a unique opportunity to better link the University with the commercial node. The University has a shuttle bus service and regular Metro Transit bus service connecting the East Bank and West Bank campuses. Light rail should not merely duplicate this function. Moreover, this station location does not allow for Cedar-Riverside to function as a multi-modal destination, with increased transit-oriented development potential, redevelopment potential and generation of private, non-University investment in Cedar-Riverside.

The Cedar Riverside Business Association and the West Bank Community Coalition have expressed interest in having the station located in close proximity to Cedar Avenue. They question why the station would be remote from a significant roadway when we have a choice to put the station in a more convenient, practical location - and closer to the Hiawatha Line.

The West bank has a number of cultural uses that are omitted both as area assets and major trip generators. These include: the Cedar Cultural Center, 400 Bar, Triple Rock, Southern Theater, Mixed Blood Theater and Dudley Riggs Theater.

- Page 5-13: Transit-Oriented Development (TOD) Analysis. Redevelopment and infill development potential would be greater if the West Bank station location were moved closer to the Cedar Avenue Community Corridor and the Cedar-Riverside Activity Center because there are a greater number of potential sites here as opposed to the current proposed station location.

- Page 5-15: Stadium Village Station:  
The EIS should recognize the planned Gopher football stadium and the University's proposed Academic Health Center Precinct Plan (that proposes construction of at least 5 research buildings north and east of the proposed football stadium) when identifying major trip generators.
- Page 5-16: Transit-Oriented Development (TOD) Analysis. The TOD analysis for the 29<sup>th</sup> Avenue SE Station describes existing land use but does not note the planned future land use and infrastructure improvements as detailed in the city-adopted Southeast Minneapolis Industrial (SEMI) Refined Master Plan that would help to improve the redevelopment potential in and around the station area.
- Page 5-16: 29<sup>th</sup> Avenue SE Station:  
This should be updated to reference the Southeast Minneapolis Industrial (SEMI) Refined Master Plan (adopted in 2001). The SEMI/University Research Park Revised Master Plan recommends a street pattern with traditional street alignments and land parcels that will not be "oddly shaped". The "infill potential" for this area is "high" or "very high". The University Avenue corridor is presently being redeveloped with high density housing and commercial activities and more infill is planned. The evaluation of the "Redevelopment Potential" should recognize the planned privately redeveloped research park of approximately 60 acres, potential for construction of more than 1,500,000 square feet of new buildings and new employment of 2,000 to 3,000 persons. The "Redevelopment Potential" for this station area should therefore be considered "High". The football stadium should be considered a "potential major trip generator". The "Overall TOD Rating" should be changed to "Very Good" or "Excellent".
- Page 5-27: 6<sup>th</sup> Street Station:  
The "World Trade Center" has a new name.
- Page 5-31 (Section 5.2.3): Impacts at Stadium Sites  
Stadium Village Station  
Fire Station 19 should not be "displaced". It is difficult to see how Station 19 could be impacted to the point where it would need to be "displaced". Regardless, it should not be displaced.

## **Chapter 6 – Transportation Impact Analysis:**

- Page 6-1 (Section 6.1): Programmed and Planned Roadway System Granary Road/Pierce Butler Road is a programmed augmener between I-35w and I-35E within the Central Corridor and should be included in discussions in this entire section. Also, should there be discussions/impacts determined for 25<sup>th</sup> Ave. SE and 27<sup>th</sup> Ave. SE? These streets will be extended through the SEMI redevelopment area to Granary Road.