

**Attachment #2 - Bottineau Corridor LRT**  
**Draft Environmental Impact Statement Comments**  
**City of Minneapolis**  
*May 13, 2014*

**Overall Comments:**

- 1) The City of Minneapolis supports the Locally Preferred Alternative (LPA) route.
- 2) The City of Minneapolis supports the purpose and need for this project.

The Purpose and Need section of the DEIS accurately describes the reasons why the Bottineau Transitway is needed, including:

- (a) The need to provide a higher level of transportation service to North Minneapolis, especially for those who do not have a car.
- (b) The need to provide greater connectivity to and between North Minneapolis and the rest of the region. This line will increase and expand the connectivity between residents and employment opportunities.
- (c) The need to accommodate future population growth (to meet the Metropolitan Council's population projections), to increase new jobs and access to existing jobs, and to strengthen neighborhoods.

**General Technical Comments:**

- 1) Two local north/south streets that currently have median openings on Olson Highway are proposed to be closed, thereby limiting vehicular access to right-in/right-out movement (Russell Avenue North and Elmwood Avenue North). Bicycle and pedestrian crossings must be maintained through the alignment, across LRT tracks and Olson at both intersections.
- 2) Bicycle and pedestrian crossings exist at four additional locations in alignment with streets that do not currently include a vehicle median break (but do have sidewalks) along Olson Highway (Queen Avenue North, Sheridan Avenue North, Newton Avenue North, and Logan Avenue North). Bicycle and pedestrian crossings must be maintained through the alignment, across LRT tracks and Olson at all four intersections.
- 3) Diverted vehicular traffic must be accommodated in a manner that is compatible with the surrounding neighborhood context.
- 4) The City of Minneapolis is opposed to the placement of the Operations and Maintenance Facility for this line within the City of Minneapolis.
- 5) Both stations within the corporate boundaries of Minneapolis (Penn and Van White) must be constructed.
- 6) Construction of both the Golden Valley Road Station and the Plymouth Avenue Station is necessary to adequately serve the corridor travelshed, including a significant portion of North Minneapolis. Though these stations are located outside of Minneapolis corporate boundaries, they are located close enough to ensure improved access to the regional fixed rail system for residents in North Minneapolis, and will improve ridership.
- 7) Conduct additional study to ensure the narrowing of Olson Highway so that the combination of street and LRT line will help to catalyze a denser, more urban development pattern within the corridor; one that will ensure that new development along the line is truly transit-

oriented, rather than highway-oriented. The existing highway environment needs to be redesigned and modified in order to provide greater balance. Specifically, the roadway needs to be designed in order to accommodate the necessary vehicular traffic while also accommodating and enhancing connectivity between transit, pedestrian, and bicycle networks. The project office will need to work on this critical topic with Hennepin County Community Works and the City of Minneapolis as station area planning progresses.

- 8) Specific ridership (not a range) at individual stations must be determined (both boarding and alighting). Further work is needed to determine pedestrian capacity and needed infrastructure improvements at the Downtown Minneapolis stations given that the Bottineau Corridor will be the fourth LRT line to run along the high-volume 5<sup>th</sup> Street corridor.
- 9) Safety and security at station locations and routes to/from stations is critical. It is recommended that measures such as (but not limited to) surveillance cameras and street lighting (per the City of Minneapolis street lighting policy) be installed and that station design allows for visibility at stations.
- 10) The City of Minneapolis requires that local stormwater policies and ordinances be adhered to. Stormwater management, wetland and flood plain mitigation must consider not only the specific area of impact, but broader impacts on the local area and regional system.
- 11) The City of Minneapolis does not support park-and-ride facilities within City limits. Vacant lots near the proposed Van White Station are needed for TOD redevelopment, which will help improve density and ridership at that station.
- 12) Traction power substations and signal bungalows must be appropriately placed and the visual impact mitigated. Traction Power Substations should be appropriate for the community context, should be landscaped, should be fenced for safety, and should be designed with architectural fencing instead of chain link fence.
- 13) Utilities and street infrastructure disrupted as part of the project must be replaced at the project's expense.
- 14) Noise and vibration from the LRT operations must be mitigated
- 15) The City of Minneapolis is opposed to LRT pre-emption at signalized crossings.
- 16) The City of Minneapolis supports efforts to minimize project impacts on identified historical or cultural resources.
- 17) The project must minimize tree loss; salvage trees where possible and replace trees per the Minneapolis Park and Recreation Board urban tree policy. Boulevard design should be consistent with the Minneapolis Design Guidelines for Streets and Sidewalks.
- 18) Public art must be integrated into station design.
- 19) Pedestrian Level Street Lighting should be evaluated in accordance with the City of Minneapolis Street Lighting Policy. Traffic impacts to the Olson Highway/I-94 bridge need to be mitigated. Any ornamental railings and artwork must be salvaged.
- 20) Catenary poles along Olson Highway should reflect the same style used along University Avenue (painted tapered tubular design).
- 21) Embedded track should be constructed along the entire length of Olson Highway.
- 22) Best practices for mitigating the construction impacts for local businesses should be implemented.
- 23) Traffic impacts along the corridor need to be mitigated, especially traffic impacts to the Olson Highway/I-94 Bridge, the segment east of I-94 into the Interchange, and the at-grade crossing at 7<sup>th</sup> Street/10<sup>th</sup> Street.

The general technical comments above and the detailed technical comments found in this attachment will help mitigate the impacts of the project and will better serve the needs of Minneapolis.

### **Detailed Technical Comments (By Chapter):**

#### Executive Summary

- No Comments

#### Chapter 1 –Purpose and Need

- Page 1-10, Section 1.3 – The purpose statement is just about transportation for businesses and people. It should also include reference for serving and creating transit-supportive development opportunities along the line, particularly near station areas. This is inherent in how station areas are designed so should be identified up front as part of the purpose of this project.
- Page 1-25, Table 1.5-1 – The development section of this table should more specifically reference development near station areas, in addition to the more general language here.

#### Chapter 2 –Alternatives

- The City of Minneapolis concurs that LRT on the D1 alignment is the preferred alternative. For the D1 and D Common portion of the LPA that runs along Olson Memorial Highway (Hwy 55) there are significant impacts to the bike, vehicular, and pedestrian function for the surrounding neighborhoods; there are potential visual impacts; and there is limited development potential. The corridor is currently a barrier between the communities to the north and south of the highway and the addition of the LRT should not further complicate this condition; it should resolve this condition by connecting communities. Decisions about the impacts of the D1 and D Common alignment on Olson Memorial Highway are based on assumptions of traffic operations and do not consider all of the above noted impacts. The future design and function of LRT on Olson Memorial Highway should not be precluded by these traffic assumptions and should be based on a study of the feasibility of, but not limited to, a combination of travel lane reductions, travel lane narrowing, elimination or relocation of frontage roads, and other pedestrian access and safety strategies with the intent of creating developable parcels at station areas and along Olson Memorial Highway. The DEIS, station area planning, and future stages of the project should consider the form, function, and visual impacts of Olson Memorial Highway to mitigate any negative impacts and to create significant development opportunity and pedestrian and bike access and safety. The completed traffic study for Olson Memorial Highway, while acceptable for studying traffic impacts, based on current operating assumptions, does not address the larger issues of development potential, connections between neighborhoods, and the barrier that Olson Memorial Highway creates between neighborhoods and that will be exacerbated by the addition of LRT without appropriate mitigation or planning. Additional study is needed to consider this

issue in relation to station area planning, enhancing TOD opportunities and creating nodes where population and employment density can be increased.

- Page 2-13, Table 2.4-1 – The Golden Valley Rd and Plymouth Avenue stations are needed for reasons beyond the initial forecasted ridership such as access to transit, economic opportunities, access to jobs, and access to Theodore Wirth Regional Park from other parts of the region.
- Page 2-14, Operations and Maintenance Facility – The city supports proposed OMF sites in Brooklyn Park.
- Page 2-18, Traction Power Substations (TPSS) – The DEIS states that TPSS locations are anticipated to be within the existing right-of-way. If in fact private property acquisition is needed, there should be early notification of impacted property owners to ensure time for coordination/negotiation. The City of Minneapolis will also want to review in more detail the location of the TPSS sites as they are refined. It should be a priority to place these in unobtrusive locations, such as under overpasses, and to appropriately screen them from view with architectural fencing and landscaping.
- Page 2-18, Trackway – Embedded track should be utilized on the D1 and D Common portions of the project in the Hwy 55 corridor.

### Chapter 3 –Transportation Analysis

- General Comment - The construction of LRT should be designed and built in a way to enhance connectivity rather than compounding disconnectivity between places and neighborhoods.
- Page 3.3.5 –More study is needed to look at traffic, pedestrian, and development impacts at Hwy 55 and Penn, Van White, and the 7<sup>th</sup> St/6<sup>th</sup> Ave area near Target Field.
- Page 3-4, Affected Environment – Please analyze the transit service area past the southern edge at Highway 55. For example, Route 9 serves the neighborhood immediately to the south, but is not mentioned here.
- Page 3-6, Table 3.1.1 – More information is necessary regarding the elimination of route 19H; Consider adding evaluation of Route 30.
- Page 3-15, Footnote – The CCLRT is a good place to start with the process. However, some concerns were raised by the stakeholders along CCLRT in response to perceived deficiencies and limitations in the outreach. It would be better to state it would be the intent to “build upon” what was done along CCLRT rather than to say it would simply be replicated.
- Page 3-31, Alignment D2 – The restriction of traffic on many cross-streets (cul-de-sacs and right-in/right-out) can have a negative impact on traffic flows in the larger area. Any necessary modifications to the vehicular circulation system must be made in a way that is urban in character, not suburban. Modifications that eliminate vehicular connectivity

should not be de facto interruptions to the pedestrian and bicycle networks that currently exist or potentially might be built in order to enhance the urban grid.

- Page 3-31, Table 3.2-2 – More information will be necessary about the bridge modifications to assess their impacts.
- Page 3-32, Alignment D – The elimination of the pedestrian crossing of TH 55 on the west side of Lyndale is problematic. This crossing connects two residential neighborhoods, and there are few nearby alternatives for those wishing to cross on foot. Removal of a designated crossing may encourage illegal and potentially unsafe crossing in the vicinity. Is there a potential to add a pedestrian actuated signal to ensure it does not interfere with normal signal operations when no pedestrian is present?
- Page 3-36, Alignment D1 – The closure of pedestrian crossings at three consecutive streets crossing Highway 55 (Queen, Russell, and Sheridan) creates a fairly large gap in the pedestrian network. Will there be any barriers to discourage or prevent crossing? Was there any assessment if a significant number of people currently use these crossings?
- Page 3-37, Alignment D2 – As with vehicle traffic, this route alignment greatly curtails pedestrian connectivity in this area. This is indicated later on p. 4-36.
- Page 3-37, Alignment D - The closure of pedestrian crossings at three consecutive streets crossing Highway 55 (Oliver, Newton, Logan, and James) creates gaps in the pedestrian network. Will there be any barriers to discourage or prevent crossing, and what would those likely be? Was there any assessment if a significant number of people currently use these crossings? How will remaining pedestrian crossings be enhanced?
- Page 3-45, 3.5.3 Alignment D2 – Removal of parking may negatively impact businesses and residences in the area that depend on on-street parking due to limited off-street parking. It is unclear from later in the text (3-53) if the project would propose funding the construction of off-street parking to mitigate the loss of on street spaces.
- Page 3.36 – Under Alignment D1, the non-signalized pedestrian crossings of TH 55 at the intersections with Sheridan, Russell, and Queen Avenues would be closed. The nearest pedestrian crossings are at Thomas Avenue to the west and Penn Avenue to the east. It is expected that pedestrian crossings will increase at proximate signalized intersections due to diverted traffic from closed crossings and increased activity at and around station areas. Pedestrian safety enhancements should be made at these crossings, especially at the unsignalized intersection of Thomas Avenue. General strategies to improve pedestrian safety and comfort should include, but are not limited to, a combination of the following: travel lane reduction, travel lane narrowing, curb extensions, pedestrian median waiting areas, durable enhanced crosswalk markings, and landscaping.
- Page 3.37 – Under Alignment D2, pedestrians would be allowed to cross the LRT guideway only at signalized intersections along West Broadway Avenue and along Penn Avenue. Along West Broadway the unmarked pedestrian crossings of 27<sup>th</sup> Avenue/Thomas Avenue and Sheridan Avenue would be closed. The nearest pedestrian crossings are at 29<sup>th</sup> Avenue, 26<sup>th</sup> Avenue, and Penn Avenue. Along Penne Avenue, the

unmarked pedestrian crossings of 21<sup>st</sup>, 17<sup>th</sup>, 15<sup>th</sup>, 14<sup>th</sup>, 12<sup>th</sup>, and 8<sup>th</sup> Avenues would be closed. The nearest pedestrian crossings that would remain open are at West Broadway Avenue, Golden Valley Road, 16<sup>th</sup> Avenue, Plymouth Avenue, Oak Park Avenue, and TH 55. It is expected that pedestrian crossings will increase at proximate signalized intersections due to diverted traffic from closed crossings and increased activity at and around station areas. Pedestrian safety enhancements should be made at these crossings. General strategies to improve pedestrian safety and comfort should include, but are not limited to, a combination of the following: travel lane reduction, travel lane narrowing, curb extensions, pedestrian median waiting areas, durable enhanced crosswalk markings, and landscaping.

- Page 3.37 – Under Alignment D2, the crossing of West Broadway Avenue at 27<sup>th</sup> Avenue/Thomas Avenue would be closed. The 2011 Minneapolis Bicycle Master Plan identifies Thomas Avenue as a bicycle boulevard from 42<sup>nd</sup> Avenue to Oak Park Avenue. This bikeway is planned, but currently unfunded. A closure of 27<sup>th</sup> Avenue/Thomas Avenue at West Broadway Avenue would create a barrier and disrupt a continuous bicycle boulevard route along Thomas Avenue. The future bikeway would need to be rerouted to cross West Broadway Avenue at 26<sup>th</sup> or 29<sup>th</sup> Avenue.
- Page 3.37 – Under Alignment D2, the crossing of Penn Avenue at 8<sup>th</sup> Avenue would be closed. The 2011 Minneapolis Bicycle Master Plan identifies 8<sup>th</sup> Avenue as a signed bicycle route from Theodore Wirth Park to Van White Boulevard. This bikeway is planned, but currently unfunded. A closure of 8<sup>th</sup> Avenue at Penn Avenue would create a barrier and disrupt a continuous bikeway along 8<sup>th</sup> Avenue. The future bikeway would need to be rerouted to cross Penn Avenue at Oak Park Avenue.
- Page 3.37 – Under Alignment D2, the signalized intersection of Oak Park Avenue at Penn Avenue would remain open. The 2011 Minneapolis Bicycle Master Plan identifies Oak Park Avenue as a bicycle boulevard from Theodore Wirth Park to Irving Avenue. This bikeway is planned, but currently unfunded. Maintaining east-west bicycle access at the intersection of Oak Park Avenue and Penn Avenue would preserve a continuous route for a future bikeway.
- Page 3.37 – Under Alignment D2, bicyclists would share roadway lanes with vehicular traffic on West Broadway and Penn Avenues. There are currently no bicycle facilities on West Broadway and Penn Avenues, so the existing conditions would be maintained. However, future conditions may include a bicycle facility. The 2011 Minneapolis Bicycle Master Plan identifies bike lanes on Penn Avenue between 42<sup>nd</sup> Avenue and the south I-394 Frontage Road. With the addition of the LRT guideway system along Penn Avenue, it appears that there will not be enough right-of-way to accommodate bike lanes of a minimum standard width. Under Alignment D2, bike lanes on Penn Avenue between West Broadway Avenue and TH 55 would not be feasible. Access Minneapolis, the City of Minneapolis' transportation management plan includes a provision for such cases: If a bikeway identified on the 2011 Minneapolis Bicycle Master Plan cannot be installed on

the target street, a parallel bikeway should be installed that serves the same travel shed. Under Alignment D2, this provision would need to be executed.

- Page 3.37 – Under Alignment D Common Section, the non-signalized pedestrian crossings of TH 55 at the intersections of Oliver, Newton, Logan, and James would be closed. It is expected that pedestrian crossings will increase at proximate signalized intersections due to diverted traffic from closed crossings and increased activity at and around station areas. Pedestrian safety enhancements should be made at these crossings. General strategies to improve pedestrian safety and comfort should include, but are not limited to, a combination of the following: travel lane reduction, travel lane narrowing, curb extensions, pedestrian median waiting areas, durable enhanced crosswalk markings, and landscaping.
- Page 3.37 – The existing marked pedestrian crossing of TH 55 at West Lyndale Avenue would also be closed due to the number of lanes that would need to be crossed, the resulting number of vehicle conflicts, and poor signal operations. It is recommended that two considerations are made with respect to this proposed closure. First, evaluate if the hazards identified can be mitigated through travel lane reeducation, lead pedestrian intervals, protected signal phasing, durable and enhanced crosswalk markings, or other pedestrian safety measures. Second, if the crossing is closed, ensure that pedestrian access is physically restricted to ensure that there is no expectation that this is a safe and legal pedestrian crossing.
- General comments for Section 3.4 Pedestrians and Bicycles. Evaluating the alternatives from the perspective of pedestrian and bicycle impacts, the Locally Preferred Alternative D-D1 has less of a negative impact than Alternative D-D2. Both Alternatives D-D1 and D-D2 significantly impact the urban street grid by closing off local pedestrian and bicycle access at many crossings. The relative severity of impacts is greater for Alternative D-D2 because the urban street grid is more intact along West Broadway Avenue and Penn Avenue than along TH 55. West Broadway Avenue and Penn Avenue currently have narrower street widths, with fewer travel lanes and more pedestrian destinations. TH 55 is currently much wider with a greater number of travel lanes and a limited number of pedestrian destinations. To preserve existing pedestrian environments, it would be better to close crossings along TH 55 where the walkability is quite low, rather than close crossings along West Broadway Avenue and Penn Avenue, where the walkability is relatively higher.

#### Chapter 4 –Community and Social Analysis

- For the entire chapter, it should be kept in mind that the construction of LRT should be designed and built in a way to enhance connectivity rather than compounding disconnectivity between places and neighborhoods.
- Page 4.3.4.1–Traction Power Station locations are important, and should be strategically sited/mitigated, especially if one is needed in Theodore Wirth Park.

- Page 4-5, Alignment D – the language about Urban Neighborhoods should be amended to read “ Urban Neighborhood is a predominantly residential area with a range of densities that may include other small-scale uses, including neighborhood-serving commercial, and institutional and semi-public uses (for example, schools, community centers, religious institutions, public safety facilities, etc.) scattered throughout. More intensive non-residential uses may be located in neighborhoods closer to Downtown and around Growth Centers.
- Page 4-5 – For the D1 Alignment the DEIS states: “As shown in Exhibit 4-11, the primary land uses are park and low-density residential uses with no plans for changes in the future. Along TH 55, existing and future planned land uses are primarily low-density residential uses.” Language should be added to say that “future land use in the station areas will be evaluated in the station area planning process, which may result in amended land use policy and maps as a part of the adopted station area plans.”
- Page 4.6.4.1- Acquisition impacts are small in Minneapolis using the preferred alternative, but the potential redevelopment opportunities are also small, due to station location and the elevation/disconnection with neighbors to the east.
- Page 4-6 – For the D common alignments, add language to say that “future land use in the station areas will be evaluated in the station area planning process.” (1) At the Van White Station area there a several large vacant properties that are potential development sites and other underutilized sites that could be intensified with development. Station area planning will evaluate and recommend the most appropriate form and type of transit oriented development for these parcels and the surrounding station area, which may result in amended land use policy and maps with the adoption of the station area plans. (2) At the Penn Avenue/Hwy 55 station area, while there are not large vacant parcels and the area is predominantly single-family homes, station area planning will evaluate and recommend the most appropriate form and type of land use for the surrounding station area. At this station area higher density and intensity land uses will depend on a long-term strategy of parcel assemblage and strategies that could include the narrowing and/or elimination of travel lanes on Hwy 55 and frontage roads along Hwy 55, all which should be studied in the station area planning process. Station area planning will evaluate and recommend the most appropriate form and type of transit oriented development for these parcels and the surrounding station area, which may result in amended land use policy and maps with the adoption of the station area plans.
- Page 4-18, Minneapolis – The section describing the Near-North neighborhood references areas in the Sumner-Glenwood neighborhood. The section should be revised.
- Page 4-33, Alignment D2 – The project would have direct and significant impacts to community character and cohesion that would need to be mitigated.
- Page 4-39, Table 4.3-3 – Alignment D2 would result in major impacts in terms of property acquisitions, and would involve the displacement of a large number of residents, some of which are low income. This would need to be mitigated.

- Page 4-61, Table 4.4-1 – Alignment D2 would have an adverse effect on the Homewood historic district, as well as significant visual impacts on area resources.
- Page 4-74 – Impacts from Alignment D1 on Wirth Park should be mitigated with additional planting and screening as needed, since the project will involve thinning out the vegetation in the area. This is suggested later on p. 4-76. However, vegetation should not be allowed to block station areas and their access points in a way that is unsafe and obscures activity.
- Page 4-84, Design Elements – Safety and security should be addressed not only in station area design, but along major pedestrian routes leading to the stations (including those within the 0.25 mile radius called out earlier in this section). These should be visible, well lighted, and regularly monitored. This should be true throughout the corridor, including residential areas, parklands, and rail corridors that otherwise might have little traffic and activity, and therefore may result in travelers being more isolated.

#### Chapter 5 –Physical and Environmental Analysis

- City Water Utilities - This comment is to address the large water mains that may be affected by the future Bottineau LRT line as indicated by the current layout shown on the Met Council web page (<http://www.metrocouncil.org/Transportation/Projects/Furture-Projects/Bottineau-Transitway/Bottineau-Maps/Bottineau-Transitway-Map-Large.aspx>). There are many smaller water mains that cross under the proposed Bottineau line and the final condition of those mains will need to be addressed eventually. The large water mains of concern are as follows: There is a 36-inch water main in Aldrich Avenue North crossing under Olson Memorial, there is a 24-inch water main in Penn Avenue North crossing under Olson Memorial and there is a 48-inch water main crossing under the existing tracks just north of Golden Valley Road at the western border of the City. These mains need to remain in place and at a minimum will need to be cathodically protected under the tracks and isolated on either side of the future track alignment. Concrete encasement of each of these mains may be necessary and if deemed necessary, the existing pipe to be concrete encased shall be removed and replace with new pipe prior to concrete encasement. This work to alter the existing pipe shall only occur during the time frame between the months of October and April inclusive.
- Page 5-9 – Table 5.1-3, Alignment D - In addition to the sanitary sewer line running located on the south side of TH55/ 6<sup>th</sup> Ave N, there are several sanitary sewers crossing TH 55/ 6<sup>th</sup> Ave N
- Page 5-11, Overhead Utilities – More information is needed about the potential need for relocation of overhead utility poles, particularly those requiring relocation outside of transitway right-of-way. Would this require additional land purchases and/or easements, over and above what is already identified? Is there a potential to move some of the power lines underground as part of this project? What are the costs? What models are being used in other metropolitan areas to address and mitigate the conflicts brought about by overhad utilities and urban development? From the engineering drawings, it appears this

will result in high voltage transmission lines right on the edge of the BNSF right-of-way that is adjacent to residential areas. Is there accommodation of a needed easement for this outside the ROW, for both maintenance and to account for the fall distance of the poles?

- Page 5-21, Alignment D1 – More information is needed about potential location of floodplain storage mitigation, and its impacts on the surrounding area, including parkland, the golf course, and any nearby residential areas that might be impacted.
- Page 5-23, Figure 5.2-6 – The locations identified for potential floodplain mitigation appear to be on land currently being used for a trail loop around the perimeter of Wirth Park that connects with the Luce Line Trail and various park amenities; would this require a trail relocation?
- Page 5-24, Wetlands – There are significant wetland impacts outside the city limits. To mitigate the wetlands new wetlands must be created. It should be noted that there is no room for replacement wetlands within the city. Vacant parcels within the city are needed for redevelopment. The construction of this line should not contribute to the pollution of the Basset Creek Valley watershed; it should continue toward – or at least not complicate – the clean up of this watershed.
- Page 5-49, Noise – The project noise levels for D1 and D2 reflect moderate to severe impacts compared with existing ambient noise levels. How will this be mitigated?
- Page 5-61, Table 5.6-9 – Noise barriers are called out as a potential mitigation strategy for D1 noise impacts. More information is needed regarding the type, placement, and size of these walls. This mitigation measure should also be considered in context of other factors, such as blocking views of the park amenity from adjacent residential communities, likelihood of graffiti/tagging on barriers in less populated areas, and public safety issues associated with areas blocked from view by barriers. These issues should be addressed through a robust and inclusive community engagement process to ascertain community preference. Additionally, more information is needed regarding the potential use of sound insulation along D1 and D2 – how would this be implemented? This could be an environmental justice issue.
- Page 5-71, Table 5.7-6 – The D2 option would need proactive outreach early in the design process to KMOJ and medical care facilities regarding noise and vibration issues early in the process to determine if special mitigation needed. While the analysis suggests this is not the case, this could possibly be disputed.
- Page 5-92, 5.8.5 – This section says there will be no impact on the wetland habitat of Blanding's Turtle. However, the floodplain mitigation section says there will be new floodplain storage, likely constructed near to existing wetland areas, required as part of the project, which could impact the wetlands. This should be addressed in more detail. (This is discussed to an extent on p. 8-20)
- Page 5-93 – 5.9.1 States that Physical Infrastructure (storm sewer) associated with stormwater management is discussed in Section 5.1, but Section 5.1. (page 5.8) says the existing storm sewers are discussed in detail in the Stormwater Technical Report

(Appendix F) which does not discuss storm sewer infrastructure in detail. It just discusses stormwater management and mentioned the need to reconfigure storm sewer utilities. The impacts to Old Basset Creek tunnel crossing in particular should be discussed in more detail.

- Page 5-97 – Table 5.9-2 – Line MPCA (Cities) indicates that these requirements are also the Cities'. This is not correct. This is a copy of Table 3 from the stormwater technical report, but it does not say Cities under MPCA. Neither table actually lists the City requirements.
- Page 5-101, Table 5.9-4 – For Alignment D, are the ditches identified for infiltration existing, and do they have adequate size and capacity for what is proposed? Looking at the cross sections provided, ditches do not appear in most of them. For alignments D2 and D, have locations been identified for the proposed pond and infiltration BMPs? This urban environment is fairly constrained, with limited land available for improvements such as these. Maps are shown for locations along Alignments A-C, but not for the others.
- Page 5-110, Alignment D – The analysis does not take this into account directly, but the presence of institutions serving vulnerable populations (e.g. youth and elderly), including a day care, school, library, and low income housing, suggests a priority in finding ways to mitigate air quality impacts. This includes optimizing travel to avoid lengthy queues and idling at intersections. This is also potentially an environmental justice issue, since low income and minority populations are disproportionately impacted. When there are deficiencies in modeling (as noted here), there should be a commitment to following up with adjustments as needed once the project has advanced.

#### Chapter 6 –Indirect Effects and Cumulative Impacts

- Page 6-6, Table 6.3-1 – While the text states that the actions listed here are in no way dependent on the completion of the Bottineau transitway, it is possible that some additional development may occur in the Downtown/North Loop station areas of Alignment D at least in part related to improved transit connectivity through this and other projects (although some of it will occur regardless).
- Additional development is intended and expected along the Olson Highway portion of the project. For the D common alignments, future land use in the station areas will be evaluated in the station area planning process. (1) At the Van White Station area there are several large vacant properties that are potential development sites and other underutilized sites that could be intensified with development. Station area planning will evaluate and recommend the most appropriate form and type of transit oriented development for these parcels and the surrounding station area, which may result in amended land use policy and maps with the adoption of the station area plans. (2) At the Penn Avenue/Hwy 55 station area, while there are not large vacant parcels and the area is predominantly single-family homes, station area planning will evaluate and recommend the most appropriate form and type of land use for the surrounding station area. At this

station area higher density and intensity land uses will depend on a long-term strategy of parcel assemblage and strategies that could include the narrowing and/or elimination of travel lanes on Hwy 55 and frontage roads along Hwy 55, all which should be studied in the station area planning process. Station area planning will evaluate and recommend the most appropriate form and type of transit oriented development for these parcels and the surrounding station area, which may result in amended land use policy and maps with the adoption of the station area plans.

- Page 6-9, 6.4.1 – This section states that bicycle and pedestrian activity is likely to increase as a result of this project. However, the project proposes closing a number of currently active pedestrian crossings. How are these two things being reconciled? Will the project support pedestrian connectivity in other ways? Construction of LRT should be designed and built in a way to enhance connectivity rather than compounding disconnectivity between places and neighborhoods. Any necessary modifications to the vehicular circulation system must be made in a way that is urban in character, not suburban. Modifications that eliminate vehicular connectivity should not be de facto interruptions to the pedestrian and bicycle networks that currently exist or potentially might be built in order to enhance the urban grid.
- Page 6-13, 6.4.10 – The potential to negatively impact lower income populations due to increased property values is called out as an indirect and cumulative impact. No mitigation is identified. However, regional planning for affordable housing specifically prioritizes supporting funding affordable units near transit stations. While this wouldn't be undertaken as part of the Bottineau transitway project itself, it could be considered a form of mitigation. This was a major discussion topic along the CCLRT alignment, and has resulted in significant investment in new affordable housing there.

#### Chapter 7 –Environmental Justice

- Page 7-3, Table 7.3-1 – If available, it would also be interesting to be able to contrast the minority percentages with other transitway corridors in the region, to allow for more ready comparison of the strategies being used in each area. While the methodology focuses on equal treatment of all populations in the study area, it should be noted that Bottineau has a higher overall concentration of low income and minority populations, and environmental justice should take into account not just approaches within the Bottineau corridor but along other comparable corridors as well.
- Page 7-21, 7.4.3 – The list of ways that input from the meetings impacted the project and DEIS to date is a good start. It would be helpful to understand if there were any major concerns raised by the community about the project, and how those were addressed.
- Page 7-23, Safety and Security – This should consider ways to create safe routes to the transit station in addition to the conditions at the stations.
- Page 7-25, Pedestrian and bicycle facilities – the Hwy 55 corridor will have impacts on bike and pedestrian facilities that need to be mitigated.

- Page 7-27, Visual/Aesthetics – If the noise barriers are constructed as mitigation, this will have some visual impacts on the community (including potentially blocking views of the park); it doesn't appear that this is taken into consideration here; while they are not fully defined, it appears that they will be near to low income communities.
- Page 7-33, 7.5.3.1 – As the project advances, it will be important to ensure that overall service levels on connecting bus routes remain at current levels or better. There could be an unintended negative impact on local riders if local bus service is replaced in any way by light rail, resulting in longer headways and station locations that are farther apart. This does not appear to be the plan, but there will no doubt be a route study at some point to look at potential changes to nearby routes.
- Page 7-34, 7.5.3.3 – Will there be an effort to hire DBE/WBE firms and employees during the construction phase? Local employment in the project would be a significant benefit.
- Wetlands in Golden Valley are part of the Basset Creek Valley Watershed (BCV) and these flow into the corporate boundaries of the the City of Minneapolis. This line should not contribute to the pollution of the BCV watershed; it should continue toward – or at least not complicate – the clean up of this watershed.

#### Chapter 8 –Draft Section (4f) Evaluation

- The City of Minneapolis recognizes that the Minneapolis Park and Recreation Board is the local park authority responsible for determining parkland impacts.
- Page 8-19, 8.4.1.2 – The 4(f) evaluation notes that the project will only take a small amount of land in Wirth Park. However, earlier in the document it makes it clear that it will be removing over 10 acres of wetland with the proposed alternative – while the plan for stormwater is to accommodate it largely within existing ditches. Is this all within railroad right-of-way? And is there an assurance that any potential drainage impacts to the larger area will be taken into account, including those outside the project's construction limits?

#### Chapter 9 –Consultation and Coordination

- Page 9-1, 9.1.1 – Goals should clearly call out the intention to proactively involve underrepresented groups, including low income populations and communities of color. It appears this was done, but it is not stated up front this was a goal.

#### Chapter 10 –Financial Considerations

- Page 10-2, Table 10.1-1 – Does the right-of-way cost estimate for D2 take into account cost of relocation assistance for residents from the homes that would be removed? And does the construction cost of D1 take into account the construction of noise barriers and other noise mitigation features, and the cost of wetlands bank purchases?
- Page 10-3, Construction Costs – Is there a map or graphic to show the limits of construction to demonstrate where improvements included in the cost estimates will be

made? This is needed to determine what projects will be identified as mitigation/betterments outside the scope of the main project and therefore needing additional funding to be completed.

#### Chapter 11 –Evaluation of Alternatives

- Page 11-11, Alternative B-C-D1 – The significant wetlands impact is identified as differentiator, but needs to be better qualified as it is a negative for this alternative (i.e. doesn't directly support its status as a preferred alternative).
- Wetlands in Golden Valley are part of the Basset Creek Valley Watershed (BCV) and these flow into the corporate boundaries of the the City of Minneapolis. This line should not contribute to the pollution of the BCV watershed; it should continue toward – or at least not complicate – the clean up of this watershed.

#### Appendices

- Appendix E; Alignment D – The City of Minneapolis is working on a possible art installation, the John Biggers Seed Project, on Bridge 27785 over I-94. City staff has been consulting Hennepin County and MnDOT. Consultation and coordination between the applicable agencies regarding the proposed LRT project and this art installation should continue.