Central Corridor LRT
Supplemental Draft Environmental Impact Statement Comments
August 4, 2008

Executive Summary

- S-2 (Figure S-1) – Map shows transit/ped mall to Oak Street; can be problematic since not clarified that endpoint is up for discussion, and ES is likely to be read by more people than whole plan; also described in text on page S-8

- S-19 (Public Involvement) – Need to update language on county/city public hearings held in June and July

Chapter 1 – Purpose and Need for the Proposed Action

- 1-14 – Fairview Hospitals and Clinics should specifically be called out under employment opportunities in the UofM/Prospect Park segment. Augsburg College should also be represented.

- 1-22 – Under 1.4 Planning Context, the list of plans does not include a single plan in Minneapolis. The Central Corridor is addressed in:
    - The Downtown East/North Loop Master Plan (adopted 2003)
    - University Ave SE and 29th Ave SE Development Objectives and Design Guidelines (2007)
    - The Cedar Riverside Small Area Plan (adopted 2008)
    - The Minneapolis Plan for Sustainable Growth (comp plan adopted by City 2008)
    - Intermodal Station Siting and Feasibility Study (Hennepin County, 2006)

- 1.3.3 p. 1-23 2030 Transportation Policy Plan – States that the Cedar Avenue and I-35W BRT corridors would connect with the Central Corridor. This connection is indirect, at best. Similar comment for p. 1-25 where it states that the Central Corridor will serve as a distributor for several BRT corridors.

- 1.3.3 – p. 1-24; the map identifies the Bottineau Boulevard Corridor as BRT. An Alternatives Analysis is presently underway so the transit mode is not yet determined. It should be referred to as a Transitway.

Chapter 2 – Alternatives Considered

- 2-15 (At-Grade LRT Alignment with Transit/Pedestrian Mall Alternative) – The pedestrian/transit mall is identified as being extended east to Oak St whereas the current plan is to terminate the transit Mall at Walnut.

- 2-19 (Vehicle Maintenance and Storage Facility) – The SEMI location for the vehicle maintenance and storage facility may not be consistent with the SEMI Master Plan

- 2.2.3 – p. 2-24; Table 2-1 – It seems like the table should acknowledge the "location refined" for the West Bank Station.

- 2.3.4; Figure 2-4 – Revised Location of West Bank Station not included on graphic.

- 2-39 (Transportation Effects) – Number of intersections at LOS E & F goes down – this seems to contradict initial traffic studies surrounding Washington Ave transit pedestrian mall; similar table on 10-3.

Chapter 3 – Social Effects

- 3-21 – Under 3.1.2.5, land uses and zoning in the West Bank/Cedar Riverside area are not summarized.

- 3.3-21 – Under 3.1.2.6, it is a generalization to say that zoning around the Metrodome allows for light industrial uses. While some of this zoning still exists, the City did a comprehensive rezoning in this area and the rest of downtown to allow for transit-oriented development near the transit stations.

- C3-49 (Cedar-Riverside) – The neighborhood does not have a large concentration of Native American people, though there is a diverse mix of ethnicities and national origins

- 3-49 (Cedar-Riverside) – Tower Hill Park, Luxton Park, and East River Flats are listed as being in Cedar Riverside; these are actually located in other Minneapolis neighborhoods, Prospect Park and University

- 3-50 (Figure 3.2-12) – The area labeled Cedar Riverside Community is incorrect, and should be relabeled Riverside Plaza Apartments

- 3-52 (Downtown West) – Hennepin County Medical Center is not located in this neighborhood, it is in Elliot Park instead (and is correctly listed under that heading)

- 3-83 (Downtown Minneapolis) – Fire Station G is in Cedar Riverside, not downtown

- 3-111 – In Table 3-13, Currie Park is incorrectly identified as being in Downtown – it should be listed under University/Prospect Park.

- 3-111 – In Table 3-13, Gold Medal Park is within 0.5 miles of the Downtown East/Metrodome station and Hiawatha Connection in Minneapolis.

- 3-112 – In Table 3.14, Currie Park is incorrectly identified as being in Downtown – it should be listed under University/Prospect Park.

Chapter 4 – Environmental Effects

4.2 Water Resources

Although it is correct that "no wetlands or public waters are located within the Central Corridor LRT Study Area", the entire study area within Minneapolis is served by a storm

drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek which is currently conveyed in a pipe system.

Minneapolis and other older cities developed before there were regulations regarding stormwater quality. Our only opportunities to improve existing conditions are during REDEVELOPMENT or by RETROFITTING.

The quality of lakes and rivers is especially important to the State of Minnesota and the City of Minneapolis. Any time there is a public project, or there is jurisdiction over a private project, the agencies involved should be looking for opportunities to make improvements for the betterment of our water resources.

4.2.1 Legal and Regulatory Context

The way, in which "City of Minneapolis" is indented, it implies the Minneapolis is a member or subset of the Capitol Region Watershed District. Minneapolis is to be listed as a separate "bulleted" agency. (For the record, the portion of Minneapolis in which the Study Area is located is within the Mississippi Watershed Management Organization [MWMO], however it would not be accurate to indent Minneapolis under the MWMO either. It needs to be shown as a separate "bulleted" agency.)

4.2.1.3 Minnesota Pollution Control Agency

Within the sentence, "The MPCA and City of Minneapolis review draft NPDES permits", strike out "City of Minneapolis". The City does require a copy of the project's NPDES Construction Permit Application including the Stormwater Pollution Prevention Plan (SWPPP) as part of its Erosion & Sediment Control Permit process, however the City is not an official reviewer for the NPDES Permit evaluating that there is compliance to the more stringent of the requirements between the MPCA permit and the Minneapolis permit.

4.2.1.5 Cities of Minneapolis and St. Paul

Regarding the first paragraph:
For Minneapolis, the first and third sentences of the first paragraph are not accurate. (The second sentence pertaining to FEMA and floodplains is accurate for Minneapolis.) For Minneapolis, the following replacement language is an acceptable substitution for the first and third sentences:

> Minneapolis regulates water quality through its building plan reviews, its Erosion & Sediment Control Ordinance, and its Stormwater Management Ordinance. An Erosion & Sediment Control Plan is required for projects that disturb in excess of either five thousand (5,000) square feet or five hundred (500) cubic yards of earth moved. A Stormwater Management Plan is required for projects on sites that exceed one acre. It is sometimes the case that the Stormwater Pollution Prevention Plan (SWPPP) prepared for the MPCA for the NPDES General Construction Permit (as described in 4.2.1.3) provides the information applicable to both of the Minneapolis plans described in this section, however there may be additional requirements by the City.

Regarding paragraphs 2, 3 and 4:
No comments.

4.2.1.6 Mississippi Watershed Management Organization and Capitol Region Watershed District

The third sentence is awkward at best, and possibly incorrect, depending on the intended meaning of the statement, which is unclear: "The MWMO and CRWD are direct tributaries to the Mississippi River." The MWMO and CRWD are agencies, not bodies of water. Some but not all of the areas within the jurisdictions of the MWMO and CRWD are directly tributary to the Mississippi River.

The fourth and fifth sentences are untrue within the City of Minneapolis. The City of Minneapolis, and not the MWMO, carries out these tasks. These two sentences should be moved to section **4.2.1.5** for at least portion of the project within Minneapolis. (For clarity, it may be preferable to divide "City of Minneapolis" and City of St. Paul" into two separate sections.)

4.2.3 Existing Conditions

The following language, shown above in reference to section **4.2**, could be added to the end of section **4.2.3**:

> Although it is correct that "no wetlands or public waters are located within the Central Corridor LRT Study Area", the entire study area within Minneapolis is served by a storm drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek.
>
> Minneapolis and other older cities developed before there were regulations regarding stormwater quality. Our only opportunities to improve existing conditions are during REDEVELOPMENT or by RETROFITTING.
>
> The quality of lakes and rivers is especially important to the State of Minnesota and the City of Minneapolis. Any time there is a public project, or there is jurisdiction over a private project, the agencies involved should be looking for opportunities to make improvements for the betterment of our water resources.

4.2.4.2 Key Project Elements

Regarding the statement, "However, the proposed construction activities will take place, for the most part, within existing impervious surfaces." With the qualifier, "for the most part", this is undoubtedly a true statement. However, there are several areas within Minneapolis that are not currently impervious that will be impacted. There are opportunities in these areas, to minimize NEW impervious surfaces. There are also opportunities throughout the corridor to remove EXISTING impervious surfaces and replace with pervious materials.

Regarding the statement, "No long-term effects to surface water runoff are anticipated;" For the purposes of the EIS, 'long-term effects' is generally understood to mean 'long-term ADVERSE effects'. It might be noted, however, that in this project there are opportunities for long-term REDUCTIONS and TREATMENT of surface water runoff.

4.2.5 Short-Term Construction Effects

Regarding the statement, "All storm drainage systems located within the Study Area are designed to accommodate runoff from the existing developed conditions, the following should be added: " . . ., however in Minneapolis the system is at or near capacity and thus rate controls may be required."

Regarding the following sentence, The City of Minneapolis should be added, as follows:

> "The City of St. Paul and the City of Minneapolis may require upgrades to the existing storm sewer system to provide additional treatment for stormwater runoff within the proposed construction limits. It is anticipated . . ."

4.2.6 Mitigation

The third sentence is poorly constructed.

4.5 Air Quality

The statement that the U of M at-grade alignment will have no greater air quality impacts than those anticipated with the AA/DEIS alignment including a tunnel because the intersections in the vicinity are not among the 5 worst-case intersections being analyzed on the corridor does not support that there is no impact with an at-grade alignment. Increases in traffic at intersections not on the corridor because of the closure of Washington Avenue will have impacts on air quality whether or not they are the "five worst-case".

Chapter 5 – Economic Effects

- 5-6 (University/Prospect Park) – The draft station area plan referred to – the "University Avenue SE & 29th Ave SE Development Objectives and Design Guidelines" – is no longer a draft. It was adopted by City Council in 2007

- 5-10 (University/Prospect Park) – Need to modify statement "Washington Avenue would be closed to all vehicle traffic" to add "except buses"

Chapter 6 – Transportation

General Comments

- Signal design and intersection capacity issues. The impacts to the following intersections have not been fully evaluated or disclosed in the DEIS or SDEIS:

  - Huron, University and Washington - complex operation and long clearance time
  - Chicago, 4th St, 5th St and Portland - complex operation and long clearance time
  - 2nd Ave N and 5th St - complex operation and long clearance time
  - 11th Ave S crossing increased number of trains and operation of interlock between Hiawatha LRT and CCLRT

- No mention of events and the impact on general traffic. Not just Basketball, football and hockey, but Northrop, Radisson, and other "minor events"

- Signal pre-emption is not to be used.

- The mitigation construction should precede the construction of the LRT.

- There is no discussion of station impacts on parking in local neighborhoods. There probably will be a need for Critical Parking areas

- 6.1.4.4 – p. 6-8; LRT Station Volumes, Table 6-6-3 – Total daily boardings at the Government Plaza of 780 by 2030 seems very low.

- 6-16, Table 6-5 -- Fourth Street 2006 ADT does not appear to be correct. If it is correct, I would suggest they compare it to the 2005 and 2007 values to determine if this low volume count is unusual.

- 6-16, last paragraph, last sentence -- The conclusion about 2030 volumes being less than 2020 volumes has no correlation to the existing 2001 or the 2006 volumes. Thus their consistency statement is without supporting facts.

- 6-17, Table 6-6 -- The 2030 volume across the Washington Ave Bridge keeps changing. The 2030 build forecast traffic volume has and still is being quoted by the CCPO as about 14,000 now it is 15,100.

- 6-17 Table 6-6 AADT for segment of Washington proposed to be closed is critical information to disclose. Fill in values where the table says Not Available.

- 6.2.3 Long Term Effects (Traffic) – The traffic analysis for the FEIS should include a study of the impacts of a complete Granary Road on the traffic network. Implementation of Granary Road may help to alleviate some of the mitigation components resulting from the Washington Avenue Transit Mall.

- 6-18, 1st full paragraph – The SDEIS declares the LOS will improve on the bridge but they have not disclosed the data or analyses stating what the LOS would be on the bridge with Wash Ave closure. Lower volume does not necessarily equal LOS improvements if you also make other network (lanes, intersections) changes. In both scenarios, with and without Washington Ave closed, we have a lot of traffic being handled differently and thus LOS may be similar or different depending on a number of factors.

- 6-18, 2nd full paragraph – SDEIS states the new LRT gate near Cedar Ave would be closed every 7.5 minutes. This is only true for one LRT direction or if both directional trains would meet exactly at the same time every time. Thus this impact analysis needs to account for that the two directional trains will not meet, so the headways related to the gate should be 3.75 minutes.

- 6-18, U of M Alignment, 1st paragraph – Other transit buses besides Metro Transit and U of M will most likely use the transit mall.

- 6-18, Describe in more detail how the emergency vehicle access would be maintained.

- The SDEIS is silent on bikes on the transit mall.

- 6-18 Indicate what the confidence level is for the data from the traffic studies (high-medium-low) based on available data and limitations on various methodology (ex: were pedestrians accounted for? The regional model is unconstrained) Describe what work remains to be done.

- 6-19, 1st and subsequent paragraphs: The project is projected to open in 2014. The SDEIS traffic forecast modeling was changed from 2020 to 2030. The typical EIS approach for traffic impacts is to look at 2 forecast scenarios to understand both short AND long-term impacts. The first "short-term" scenario is usually set at 1 year after opening or in this case is 2015. The second "long-term" scenario is to match an approximate 20-year horizon and thus the regional 2030 forecast is most appropriate. Why was there not a 2015 traffic forecast accomplished to understand the "short-term" impacts?

- 6-19, 1st and subsequent paragraphs – The 2030 forecast modeling does not account for the correct roadway network that will be in-place in 2015 let alone 2030. The City of Minneapolis has numerous federally funded Non-motorized Transportation Pilot (NTP) Projects that are not included in the planned network. The following projects are within the CCLRT traffic study area and expected to be completed in 2008 and 2009:

  10th Avenue SE (Como Ave SE to Univ Ave SE) converted from 4 lanes to 3 lanes with bike lanes

  19th Avenue S (Univ Ave SE across the 10th Ave river bridge to Riverside Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes a portion of 19th Ave S south of Riverside Ave

  27th Avenue SE (Univ Ave SE to E River Pkwy) most portions converted from 4 lanes to 3 lanes with bike lanes

  Franklin Avenue E (from Riverside Ave east/northeast across the Franklin Ave river bridge to E River Pkwy) converts 4 lanes to 3 lanes with bike lanes

  20th/Minnehaha Avenues S (Riverside Ave to 26th Ave S) converted from 4 lanes to 3 lanes with bike lanes

  Riverside Avenue (Cedar to Franklin Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes portions of 4th St S and 15th Ave S westerly of Cedar

These projects should be included in both the 2015 and 2030 modeled forecasts and a reassessment of the 48 intersections should be accomplished appropriately.

- 6-19, 1st and subsequent paragraphs – This text states that only 4 intersections in 2030 are impacted by the project because the 2030 no-build scenario has 6 other intersections that will have reached LOS F. By only selecting to examine the 2030 scenario and not the 2015 "short-term" scenario, the project could be causing other impacts that are being masked by the 2030 background traffic growth.

- 6-19, The amount of delay is likely to increase at the 6 intersections identified, but was not fully analyzed. Also, the unacceptable LOS conditions will likely occur sooner with the implementation of the Central Corridor LRT project than they would have otherwise. . There are grades of LOS F and it frequently happens where one leg of an intersection operates with large delay, with minor volumes and the major approach operates at a higher level of service and the total for the intersection is a LOS higher than F

- 6-19, bulleted intersections – 2nd bullet -- Is this the Cedar/Wash/15th Ave intersection? Last bullet – Do you mean 4th St SE/10th Ave SE?

- 6-19 A much more detailed description of the affects to the traffic and travel patterns that result from the closure of Washington is needed. Including, but not limited to, the anticipated traffic volume increases on the roadway segments and freeways within the study area. The current section only talks about intersection operations everywhere except on the River Road.

- 6-19, The operation of Harvard from the ERR to Washington will be dramatically changed by the addition of substantial traffic volumes. The conflict between heavy pedestrian traffic and much heavier vehicular traffic will be difficult to manage in a safe and efficient manner.

- 6-19, last paragraph – While the conversion may improve traffic flow operations, local access and circulation will be reduced. Also, this paragraph is confusing because the conclusion is stated before the fact statements.

- 6-19, The capacity of Washington from Huron to Walnut will be dramatically reduced. It will be one lane with no turn lanes, including the prohibition of EB left turns from Oak to University.

- 6-19, This discussion states that traffic conditions on Washington would improve. What is the basis for this conclusion and which alternative is this in comparison to? With one lane of traffic and no turn lanes from Oak to either Walnut or Harvard, and the prohibition of EB left turns along Washington from Oak to University the delays to traffic could be long and unpredictable. A more detailed description of these impacts is needed.

- 6-19 (University of Minnesota Alignment) – It seems strange to say the transit/pedestrian mall will improve traffic on Washington. It will by eliminating auto traffic, but traffic at the intersections on side streets will likely not improve, as much of the traffic will not be eliminated but merely transferred to nearby streets.

- 6-19 The transit mall has no "natural" detour route. A detour traffic management plan should be developed to understand how buses, emergency vehicles, bikes and pedestrians will move when Washington is closed for maintenance, construction or emergencies.

- 6-20, The delays mentioned in Table 6-8 appear not to include train clearance interval, which could be as long as 45 seconds in which no vehicles can move. The impacts to the fire station and response time are not mentioned.

- 6-20, Table 6-8, last row for Church St – Why is there a LOS A, 1.5 sec delay stated for 2030 when this intersection is proposed for pedestrians only and/or provides local driveway access? Were their other assumptions related to public traffic volumes?

- 6-20, 1st paragraph – The last sentence reference to 4th St SE is confusing.

- 6-20, Section is about long-term effects of the Key elements and there is no discussion about access to businesses. Add discussion of those impacts.

- 6-22, For three-car train operation, what's the definition of minor impact – additional delay? Do we know this to be the case especially in the downtown areas with shorter block lengths and Dual Train operation in Minneapolis? Substantiate the statement about minor impacts to traffic operations for the introduction of three car trains. Traffic modeling of this situation has not occurred as far as the City is aware.

- 6-22, The Washington Ave bridge roadway widths have not been resolved. The proposal to have a 16 ft traffic lane does not adequately address the operation with a breakdown or closure of the one moving lane. Especially if the lane has a barrier on both sides.

- 6-23 Mitigation - Diversion impacts are not discussed in enough detail to guide decision-making. Adding turn lanes to improve operation is to broad a statement. Generally to obtain a turn lane, either the roadway must be widened – loss of sidewalk area; or removal of parking - difficult in commercial districts.

- 6-24, Section 6.3.1.2 – note the above page 6-19 comments related to the NTP bike projects. Will the CCLRT project remove any of these bike projects? If so, where will the comparable bike facilities be relocated?

- 6-24, Section 6.3.2 Access Minneapolis – References were made to the Downtown

Plan. Please also note the draft Citywide Plan: http://www.ci.minneapolis.mn.us/public-works/trans-plan/ This draft Citywide Plan is currently being updated and CCLRT should consult with Minneapolis for pending changes. The Citywide Plan is anticipated to be adopted this year.

- 6-25, Parking will be removed the entire length of Washington Avenue and much of University Avenue with no suggestion of how this might be replaced. There will be no loading and unloading of passengers or freight the entire length of Washington.

- 6-26, 6.3.2.2 Existing Bicycle Environment – Downtown Minneapolis – Identifies Marquette and 2nd Avenues as having dedicated bicycle lanes, this will not be true after implementation of the Access Minneapolis/UPA recommendation.

Chapter 7 – Section 4(f) Evaluation

- It is unclear how the traffic and their associated impacts will be assessed and determined related to the 4(f) river park and parkway resources. Should not these impacts be disclosed with the DEIS so that they can be addressed, understood, and resolved sooner.

Chapter 9 – Indirect and Cumulative Impacts

- 9-5 Reasonably Foreseeable future actions - Include in City-Mpls actions: An Urban Partnership Agreement (UPA) Project includes funding for reconstruction including dual bus lane operations along 2nd and Marquette Avenues in Downtown Minneapolis to be completed by the end of 2009. Both of these avenues intersect with 5th St LRT operations.
- 9.2.5 – 9-7; Table 9-2 – Under Granary Road Development it states "Granary Road is planned to cut through to St Anthony Parkway South." Not sure where St Anthony Parkway south is, if it exists. Any extension of Granary road beyond Minneapolis would need to be initiated by the City of St Paul.

- 9.2.5 – p.9-8; Table 9-2 – Under East River Parkway extension – It states that the "East Bank connection to Bridge 9 will be addressed by the U of M…" This statement is unclear. There is a City-led project to extend the bike trail on Bridge 9 East to Dinkytown.

Chapter 10 – Evaluation of Alternatives

- Ch. 10 - 10-5 (Issues to be Resolved) - Municipal consent process already initiated