

## **APPENDIX A**

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### **RESPONSE TO COMMENTS ON THE DRAFT AUAR**

# Minnesota Department of Natural Resources

Central Region  
16543 Haven Road  
Little Falls, Minnesota 56345  
(320) 616-2450 Ext. 248



August 26, 2013

Hilary Dvorak, Principal City Planner  
City of Minneapolis  
250 South 4<sup>th</sup> Street, Room 300  
Minneapolis, Minnesota 55415

RE: Downtown East Draft Alternative Urban Area Review

Dear Ms. Dvorak:

The Department of Natural Resources (DNR) Central Region has reviewed the Draft AUAR for the Downtown East redevelopment project. We have no comments to offer at this time.

A Thank you for the opportunity to review this project and the Draft AUAR.

If you have any questions about these comments, please call me at 320-616-2450 ext 248, or by e-mail at [michael.north@state.mn.us](mailto:michael.north@state.mn.us).

Sincerely,

A handwritten signature in black ink that reads "Michael R. North". The signature is written in a cursive, flowing style.

Michael R. North  
Environmental Assessment Ecologist

CC: Randall Doneen, Liz Harper  
Bob Patton (EQB)

ERDB #20130334

**A:** Comment noted. Thank you for your review.



*Protecting, maintaining and improving the health of all Minnesotans*

September 18, 2013

Hilary Dvorak  
Principal City Planner  
City of Minneapolis  
250 South 4<sup>th</sup> Street, Room 300  
Minneapolis, MN 55415

Dear Ms. Dvorak,

Thank you for providing the Minnesota Department of Health (MDH) with the opportunity to comment on the Alternative Urban Areawide Review (AUAR) for the Downtown East Development project.

*Asbestos/Hazardous Waste*

A Prior to the demolition of the three existing office buildings, an inspection must be conducted according to [40 CFR 61 – National Emissions Standards for Hazardous Air Pollutants \(NESHAP\)](#). Any required asbestos inspection activities must be completed in compliance with the Minnesota Asbestos Abatement Act and Rules, described in [Minnesota Statutes, Sections 326.70 to 326.81](#) and [Minnesota Rules, Parts 4620.3000 to 4620.3724](#). For additional information or for assistance interpreting the results of the asbestos survey, contact MDH staff at (651) 201-4620 or [health.asbestos-lead@state.mn.us](mailto:health.asbestos-lead@state.mn.us). Additionally, a pre-demolition survey must be conducted according to [Minnesota Rules 7035.0805](#) to properly identify all hazardous waste in the existing structures. Specific questions concerning the pre-demolition survey should be directed to the Minnesota Pollution Control Agency at (651) 296-6300.

*Affordable Housing*

B Preserving affordable housing supports home-ownership and housing stability, improves community stability, and fosters social networks. This is important for health in a number of ways. When residents spend less than 30 percent of pre-tax income on housing (affordability threshold) they have more money to spend on healthcare, doctor visits, medication, and healthy food. Additionally, instable housing – or frequent mobility – can cause stress and other mental health conditions like depression. The supply of stable, affordable housing is shrinking and demand is increasing. The project should consider providing affordable housing options.

*Energy/Climate Change*

C Reduced energy consumption results in decreased fossil fuel burning in power plants, and thus lowers carbon emissions from these plants. The project should consider ways to conserve energy, reduce energy use, eliminate or reduce greenhouse gas emissions, and promote the use of renewable energy.

*Health Impact Assessment*

D A Health Impact Assessment (HIA) is a research and community engagement process that can be used to help ensure that people's health and concerns are being considered when decisions on

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- A:** The procedures described by the Minnesota Department of Health are standard practice in Minnesota. As noted on page 19 of the Draft AUAR, a pre-demolition survey (including an asbestos survey) has now been completed for the buildings to be removed, and it was performed in accordance with the relevant requirements as cited by the Minnesota Department of Health.
- B:** Ryan Companies US, Inc. recognizes the importance of affordable workforce housing in locations near employment opportunities and transit infrastructure. It is Ryan's plan for the Downtown East development to include an affordable housing component. Most affordable housing developments require funding assistance from multiple public sources. Since these sources are not yet committed, the specific workforce housing objectives are not defined at this time.
- C:** LEED (Leadership in Energy and Environmental Design) design criteria are expected to be used in the development of site plans. The site is located near a major transit corridor (Blue Line (Hiawatha) and Green Line (Central) LRT) and bus routes. Recycling of demolition materials will be encouraged as well as operational recycling programs. Exterior building lighting will be designed to meet LEED standards. Other means of obtaining LEED credits through building design are being considered to reduce energy and resource use.

infrastructure and land use projects are being made. The National Research Council defines HIA as “a structured process that uses scientific data, professional expertise, and stakeholder input to identify and evaluate public-health consequences of proposals and suggests actions that could be taken to minimize adverse health impacts and optimize beneficial ones.” HIAs have been used to provide important health information to decision makers on a wide range of projects outside the typical health arena, including comprehensive plans, brownfield redevelopment, transportation projects, energy policies, and housing projects. Over 100 HIAs have been performed in the US to help improve public health. Ten HIAs have been completed in Minnesota, mostly on comprehensive plans and transportation projects.

An HIA could be scaled according to available resources and still answer some of the health questions posed by the community. An HIA could provide recommendations to policy makers to support possible positive health outcomes and to mitigate or prevent possible negative health outcomes to improve the public’s health and to inform zoning, permitting, monitoring, and reclamation policies.

*Physical Activity*

E Encouraging physical activity by providing parks, recreational facilities, and trails can be an effective strategy to improve the public’s health. Additionally, trips taken by bike or foot versus automobile save energy and do not emit pollutants or greenhouses gases. The project site is in the vicinity of Gold Medal Park and Elliot Park. Gold Medal Park also provides access to the Mississippi River Parkway trails. The project should consider bicycle and pedestrian connections, accessibility, and wayfinding on the project site so that future users of the site would have safe and convenient access to these facilities.

*Storm Water Runoff/ Impervious Surfaces*

F Stormwater runoff picks up and carries with it many different pollutants that are found on paved surfaces such as sediment, nitrogen, phosphorus, bacteria, oil, grease, trash, pesticides and metals. Reducing stormwater runoff helps prevent contaminated runoff from entering streams, lakes and other water bodies, which may be used for recreational purposes or drinking water. Waterborne illnesses from recreational swimming and drinking water are associated with runoff.

Future climate conditions are anticipated to result in increased frequency and intensity of storm events. The project should consider whether stormwater infrastructure and retention facilities designed for larger storm events would be appropriate to accommodate anticipated future climatic events.

*Tree Canopy*

G The addition of trees in the proposed public park/plaza provides an opportunity to expand the tree canopy in the downtown area. Preserving or expanding tree canopy and vegetation provides many benefits to communities, including lowering air temperatures, mitigating climate change and urban heat island effect, reducing air pollution, enhancing water quality, and providing psychological, physiological, and quality of life benefits. Trees and vegetation help reduce stormwater runoff that can have an adverse impact on public health.

*Vapor Intrusion*

H Given the likelihood of contaminated soils being present within the project area, it might be prudent to include a vapor barrier and passive venting system within the project design to protect

- D:** The preparation of an HIA is not a requirement of the AUAR process. The City of Minneapolis appreciates the Minnesota Department of Health bringing forward through a comment on the Draft AUAR the importance of preparing an HIA on major infrastructure projects.
- E:** Current bicycle and pedestrian routes run through and adjacent to the Downtown East development. The development includes the creation of up to two blocks of new public plaza/park.
- F:** The design for stormwater runoff has been discussed with the City of Minneapolis in terms of available capacity now and for future rainfall events, such as the expected increase in the 100-year 24-hour storm event rainfall. The storm sewer serving the project area has capacity for the future climatic events.
- G:** The City appreciates the comments related to the benefits of increased tree canopy. The City will consider trees and other vegetation as it plans the long-term use of the park space.

Ms. Dovrak  
Downtown East Development AUAR  
Page 3  
September 18, 2013

against possible vapor intrusion into subsurface portions of the new structures. This would have the added benefit of providing protection against possible radon gas accumulation in these subsurface areas.

*Well Construction*

As noted in the AUAR, two onsite wells will be abandoned as part of the project. Abandoned wells will need to be properly sealed. Additional information is available on the MDH website at [Well Sealing](#). For additional information, contact MDH staff at (651) 201-4600 or [health.wells@state.mn.us](mailto:health.wells@state.mn.us).

Health starts where we live, learn, work, and play. To create and maintain healthy Minnesota communities, we have to think in terms of health in all policies. Thank you again for the opportunity to provide comments on this AUAR for the Downtown East Development project. Feel free to contact me at (651) 201-4927 or [michele.ross@state.mn.us](mailto:michele.ross@state.mn.us) if you have any questions.

Sincerely,



Michele Ross  
Environmental Review Coordinator  
Environmental Health Division  
Minnesota Department of Health  
PO Box 64975  
Saint Paul, MN 55164-0975

- H:** Insufficient information is available to determine if vapor intrusion is a concern. Evaluation of such a potential will be considered in environmental investigations where appropriate. If vapor intrusion is identified as a concern, the provisions described by the Minnesota Department of Health are standard practice in Minnesota for mitigation of vapor intrusion risks.
  
- I:** Section 13 of the Draft AUAR includes information regarding wells within the AUAR boundary. Wells will be capped and sealed in accordance with Minnesota Department of Health requirements.



## Minnesota Department of Transportation

Metropolitan District  
Waters Edge Building  
1500 County Road B2 West  
Roseville, MN 55113

September 17, 2013

Hilary Dvorak  
Principal City Planner  
250 S. 4<sup>th</sup> St., Room 300  
Minneapolis, MN 55415

SUBJECT: Downtown East Draft AUAR and Mitigation Plan  
MnDOT Review AUAR13-006  
West of I-35W, South of Washington Ave  
Minneapolis, Hennepin County  
Control Section 2783

Dear Ms. Hilary Dvorak:

The Minnesota Department of Transportation (MnDOT) has reviewed the above referenced Draft AUAR and has the following comments:

### *Traffic/Planning:*

- A 1. No existing modeling was done because of a number of modifications planned for that immediate downtown area prior to opening of the Downtown East. Typically there should be a build year analysis. The build year uses the existing geometry (or in this case the planned geometry for day of opening) and the build year volume to determine impacts to on the existing (planned) roadways on the day of opening. This is an important issue for determining the traffic impacts.
- B 2. If an existing/ build year analysis was not completed, please indicate whether a calibration of the model was done for the downtown area.
- C 3. Please indicate how traffic will be funneled to MnDOT facilities (I-35W/I-94) as it relates to the closing of Park Avenue and Portland Avenue.
- D 4. MnDOT would also like to review the Downtown East Traffic Analysis Tech Memorandum (Kimley-Horn, Aug 2013) along with the Synchro files for the project.

Please respond to these comments to Chad Erickson in MnDOT's Traffic Section (651-234-7806 or [Chad.Erickson@state.mn.us](mailto:Chad.Erickson@state.mn.us)).

### *Review Submittal Options:*

MnDOT's goal is to complete the review of plans within 30 days. Submittals sent in electronically can usually be turned around faster. There are four submittal options. Please submit either:

- A:** Comment noted.
- B:** The traffic model was calibrated as part of the Minneapolis Signal timing project and was the same set of models used for the Minnesota Multi-Purpose Stadium EIS.
- C:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue road closure options (1 through 4) are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required. No traffic will be rerouted to MnDOT roadways due to reductions in capacity on Park or Portland Avenue.
- D:** The August 2013 Traffic Tech Memorandum and the Synchro files will be provided, as requested.

1. One (1) electronic pdf. version of the plans. MnDOT can accept the plans via e-mail at [metrodevreviews.dot@state.mn.us](mailto:metrodevreviews.dot@state.mn.us) provided that each separate e-mail is under 20 megabytes.
2. Three (3) sets of full size plans. Although submitting seven sets of full size plans will expedite the review process. Plans can be sent to:

MnDOT – Metro District Planning Section  
Development Reviews Coordinator  
1500 West County Road B-2  
Roseville, MN 55113

3. One (1) compact disc.
4. Plans can also be submitted to MnDOT's External FTP Site. Please send files to: <ftp://ftp2.dot.state.mn.us/pub/incoming/MetroWatersEdge/Planning> Internet Explorer doesn't work using ftp so please use an FTP Client or your Windows Explorer (My Computer). Also, please send a note to [metrodevreviews.dot@state.mn.us](mailto:metrodevreviews.dot@state.mn.us) indicating that the plans have been submitted on the FTP site.

If you have any questions concerning this review, please feel free to contact me at (651) 234-7793.

Sincerely,



Michael J. Corbett, PE  
Senior Planner

**Copy sent via E-Mail:**

Ron Rauchle, Area Engineer  
Bruce Irish, Water Resources  
Nancy Jacobson, Design  
Buck Craig, Permits  
Dale Matti, Right-of-Way  
Jim Henricksen, Planning and Programming  
Chad Erickson, Traffic Engineering  
Clare Lackey, Traffic Engineering  
Robert Byers, Hennepin County  
Russell Owen, Metropolitan Council



# Minnesota Pollution Control Agency

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September 18, 2013

Ms. Hilary Dvorak  
Principal City Planner  
City of Minneapolis  
250 South 4<sup>th</sup> Street, Room 300  
Minneapolis, MN 55415

Re: Downtown East Development Draft Alternative Urban Areawide Review

Dear Ms. Dvorak:

Thank you for the opportunity to review and comment on the Draft Alternative Urban Areawide Review (AUAR) for the Downtown East Development project (Project) located in the city of Minneapolis, Minnesota. The Project consists of a residential, office, and retail development with a public park/plaza. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

### **Permits and Approvals (Item 8)**

- A • Table 8.1 in this section of the EAW lists a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater (CSW) Permit. Please note that this project will require coverage under the new permit that became official on August 1, 2013. The new permit has significantly more stringent requirements for permanent stormwater treatment than the current permit in situations regulated under Appendix A of the permit (within a mile of special or impaired waters). It also affects projects not regulated under Appendix A (projects outside of the one mile radius from impaired or special waters), for which there will now be required treatment for 1 inch of runoff, as opposed to 0.5 inches, per acre of new impervious surface. Information on the new CSW Permit is available on the MPCA website at: <http://www.pca.state.mn.us/y3dqf96>. Questions regarding CSW Permit requirements should be directed to Roberta Getman at 507-206-2629.
- B • Table 8.1 also lists Storage Tank Registration; however, the Draft AUAR does not mention the need for storage tanks for the planned future uses. Please clarify if the existing Aboveground Storage Tanks will be removed and if new storage tanks are planned.

### **Solid Wastes, Hazardous Wastes, Storage Tanks (Item 20)**

C Regarding the demolition of the existing buildings, please note that a “Notification of Asbestos Related Work” must be submitted to the Minnesota Department of Health by a licensed asbestos inspector 10 working days prior to conducting abatement activities, if abatement of 160 square feet, 260 linear feet, or 35 cubic feet of RACM is required. A “Notification of Intent to Perform a Demolition” must be submitted to the MPCA 10 working days prior to the commencement of demolition. Flaking lead based paint that may be present on the structure should be encapsulated or removed and properly disposed of offsite at the appropriate disposal facility prior to demolition activities. Any lead based paint chips that are present on the ground following demolition should also be removed and properly disposed of offsite at the appropriate disposal facility. If you have any questions regarding demolition issues or asbestos and lead paint abatement, please contact Sean O’Connor in our St. Paul office at 651-757-2620.

- A:** The Draft AUAR (page 15, Table 17-1) acknowledged the August 1, 2013 rule changes and subsequent requirements. The stormwater management criteria table in the Final AUAR has been updated to remove references to current and future CSW permit conditions, and now references the August 1, 2013 requirements as the "current requirement." Specific reference is made to the volumes of treatment and detention.
- B:** Storage tank installation is noted on page 20 of the Draft AUAR. No storage tanks are known to exist within the AUAR Study Area. If any tanks are encountered, state requirements for tank removal will be followed.
- C:** The notification requirements provided by the MPCA have been added to Table 8-1 in the Final AUAR.

**Low Impact Design**

The MPCA advocates the use of Low Impact Design (LID) practices to aid in the minimization of stormwater impacts. LID is a stormwater management approach and site-design technique that emphasizes water infiltration, values water as a resource, and promotes the use of natural systems to treat water runoff. Examples include:

- special ditches, arranged in a series, that soak up more water
- vegetated filter strips at the edges of paved surfaces
- trees or swales between rows of cars
- residential or commercial rain gardens designed to capture and soak in stormwater
- porous pavers, concrete and asphalt for sidewalks and parking lots
- narrower streets
- rain barrels and cisterns
- green roofs

LID concepts may be found in the *State of Minnesota Stormwater Manual*, dated November 2005 located on the MPCA website at: <http://www.pca.state.mn.us/water/stormwater/stormwater-manual.html>.

In addition, the MPCA LID webpage provides a description and examples of LID features such as permeable pavement, rain gardens, and green roofs. Links to other resources on LID are available as well. The website is located at: <http://www.pca.state.mn.us/water/stormwater/stormwater-lid.html>.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this Draft AUAR, please contact me at 651-757-2508.

Sincerely,



Karen Kromar  
Planner Principal  
Environmental Review Unit  
Resource Management and Assistance Division

KK:bt

cc: Craig Affeldt, MPCA, St. Paul  
Doug Wetzstein, MPCA, St. Paul  
Roberta Getman, MPCA, Rochester

**D:** The stormwater BMPs for the project will include infiltration measures recognizing that water is a valuable resource, and the design will incorporate natural systems as a means to treat stormwater runoff. This approach is in line with the goals of LID practices.

STATE HISTORIC PRESERVATION OFFICE

September 18, 2013

Ms. Hilary Dvorak  
Principal City Planner  
City of Minneapolis  
250 South 4<sup>th</sup> Street, Room 300  
Minneapolis, MN 55415

RE: Downtown East Development Draft AUAR  
Minneapolis, Hennepin County  
SHPO Number: 2013-2524

Dear Ms. Dvorak:

Thank you for the opportunity to comment on the Draft AUAR for the Downtown East Development Project. It is being reviewed according to the responsibilities given the Minnesota Historical Society under the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We have reviewed the Draft AUAR and have the following comments:

- A
- On page 57, the Draft AUAR states that “since none of the designated historic districts or NRHP listed properties identified above are located within the AUAR boundary or directly adjacent to the boundary, no direct impacts to those historic resources are expected.” **From the map provided in Figure 25-1 of the Draft AUAR, it appears that 3 NRHP listed properties are located directly adjacent to the AUAR boundary: the Northern Implement Company, the Advance Thresher/Emerson-Newton Implement Company and the Minneapolis Armory. Please correct this in the AUAR.**
- B
- The relative scale of the Downtown East Development and related infrastructure in regards to the historic buildings in the area will be very important to understand when reviewing it for compliance with the Secretary of the Interior’s Standards. Please provide the heights of the proposed development, related infrastructure and any historic buildings in the project area (i.e. the Minneapolis Armory, the Advance Thresher Building, the Northern Implement Company Building, the Grain Exchange Building, and Minneapolis City Hall). It would be very helpful if a city scale section could be drawn (limited to the project area) so relative heights, scale, volume and distances can be understood. Please provide simulated views of the proposed development and any related infrastructure from the St. Anthony Falls Historic District and the South Ninth Street Historic District as well as the historic properties listed above so it can be understood how the proposed development and related infrastructure may affect the historic properties. It is very important that these views be taken from the view point of a pedestrian in a typical location on the street (no higher than 6 feet) and not an aerial view.

**A:** Text correction has been made.

**B:** Requested graphics have been inserted into the List of Figures, and referenced in Section 25, of the Final AUAR to illustrate the visual settings relative to NRHP listed properties and districts.

- C • We are also concerned about the demolition of the Star Tribune building for the Downtown East Development. The Star Tribune Building is not listed in the National Register of Historic Places (NRHP) or in the State Register, but staff recommendations have suggested that it is likely eligible for the NRHP. Because the Star Tribune Building is not officially listed in the NRHP or State Register, it is not covered by the protections of the Minnesota Historic Sites Act. However, we believe it is an important historic structure and any effects to this building should be considered.
  
- D • We had previously expressed concern regarding possible archaeological resources in the project area. We have since received a document entitled "Archaeological Resources Literature Review for the Downtown East Development Project" prepared by the 106 Group (September 2013). We have reviewed this document and agree with the consultant's recommendation that no further archaeological work is necessary for the project area.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson at (651) 259-3455.

Sincerely,



Barbara Howard  
Deputy State Historic Preservation Officer

cc: Jessica Laabs, Kimley-Horn and Associates

**C:** The main Star Tribune Building, located at 425 Portland Avenue, was constructed in 1940 as a four-story office building with one subgrade level. There have been multiple later additions to the original structure. The building is currently used as an office space for management and staff involved in producing the Star Tribune. The newspaper is printed at another location. The building is not historically designated at the federal, state, or local level. The building is not listed on either the National Register of Historic Places or the State Register, nor has it been determined to be eligible for such listing.

The Minnesota Sports Facilities Authority (MSFA) has notified the City that it considers the block on which the Star Tribune Building is located to be part of the “stadium infrastructure” within the meaning of the Stadium Act (Chapter 299, Laws of Minnesota 2012). The MSFA has further notified the City that the land use for the Star Tribune block will convert from its current commercial/office use to a public park/plaza if the orientation chosen for the stadium plaza incorporates the Star Tribune block.

**D:** The City agrees with the SHPO conclusion that no further archaeological work is required. Thank you for your review.

September 17, 2013

Ms. Hilary Dvorak, Principal City Planner  
City of Minneapolis  
250 South 4<sup>th</sup> Street  
Room 300 Public Service Center  
Minneapolis, MN 55415

RE: Downtown East – Draft Alternative Urban Area Review (Draft AUAR)  
Metropolitan Council District 7  
Metropolitan Council Review File No. 21165-1

Dear Ms. Dvorak:

The Metropolitan Council received the Draft Alternative Urban Areawide Review (Draft AUAR) for the Downtown East Development on August 16, 2013. The project includes a five-block area in Downtown Minneapolis. Three blocks are bounded by South 3<sup>rd</sup> Street, 5<sup>th</sup> Avenue South, South 4<sup>th</sup> Street, and Chicago Avenue. Two blocks are bounded by South 4<sup>th</sup> Street, 5<sup>th</sup> Avenue South, South 5<sup>th</sup> Street, and Park Avenue South. The Draft AUAR analyzes a Minimum Development Scenario and a Maximum Development Scenario, including iterations involving restricted use and/or closure of Park and Portland Avenues between South 4<sup>th</sup> Street and South 5<sup>th</sup> Street.

Metropolitan Council staff completed its review of the Draft AUAR to determine its accuracy and completeness addressing regional concerns. Staff offers the following technical comments concerning issues that need to be addressed or clarified in the Final AUAR.

**Section 13. Water Use** (Lanya Ross, 651-602-1803)

A The Draft AUAR concludes that the seasonal high water groundwater elevation is estimated to be within two to three feet of the observed groundwater (30 feet below ground surface), and that permanent dewatering is not anticipated. However, current groundwater levels may be affected by the high percentage of impervious surface currently on and around the site. The Final AUAR should discuss the potential impact of increased infiltration, and limitations thereof, on groundwater levels. (See related comments immediately below and under Section 27.)

**Section 17. Water Quality: Surface Water Runoff** (Jim Larsen, 651-602-1159)

B The Draft AUAR states that Blocks 4 and 5 are proposed to be converted to pervious public plaza/park uses from predominantly impervious surface parking use. The document does not contain any supporting information to indicate how the two blocks are planned to be redeveloped as park/open space. The Final AUAR should also acknowledge that stormwater infiltration may be limited, depending on the information and recommendations presented in the upcoming Environmental Site Assessment and Construction Contingency Plan. Council staff requests that the Final AUAR also incorporate information on proposed soil amendment plans; discussion of tree and perennial vegetation planting schemes; indication of planned pedestrian movement pathways; and projected pervious/impervious coverage for the blocks that will support the expectation that runoff infiltration will be substantially enhanced on the site.

[www.metrocouncil.org](http://www.metrocouncil.org)

390 Robert Street North • St. Paul, MN 55101-1805 • (651) 602-1000 • Fax (651) 602-1550 • TTY (651) 291-0904

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- A:** Project specific analysis will be completed to determine the potential for stormwater infiltration to influence the current groundwater levels during rain fall events. The City, through its storm water approval process, will require any necessary mitigation measures.
- B:** Additional information has been added to Section 17 of the Final AUAR to describe the types of BMPs that would be used in various parts of the project, and ranges of impervious coverage area provided.

**Section 18. Water Quality: Wastewaters** (Roger Janzig, 651-602-1119)

C The Draft AUAR addresses the available capacity of Metropolitan Council Interceptor I-MN-310. However, the Final AUAR should also note that this interceptor travels through the project area, running within the Portland Avenue and 4th Street South rights-of-way. The interceptor was built in 1887 and is a 90 by 95 inch Brick pipe at a depth of approximately 74 feet. To assess the potential impacts to our interceptor system, prior to initiating this project, preliminary plans should be sent to Scott Dentz, Interceptor Engineering Manager (651-602-4503) at the Metropolitan Council Environmental Services for review and comment.

**Section 21. Traffic**

Traffic Analysis Methodology (Russ Owen, 651-602-1724)

D A review of the Draft AUAR shows that the traffic analysis done for this development assumed access into downtown Minneapolis from westbound I-94 would occur via the existing 5th Street off-ramp. In late June, the Minnesota Department of Transportation awarded \$6,790,000 from the Transportation Economic Development Program (TED) to the City of Minneapolis to construct a westbound I-94 7th Street off-ramp and repurpose the 5th Street off-ramp. This change in accessing downtown Minneapolis from westbound I-94 would significantly affect the amount and flow of traffic on city streets in the area, especially in the A.M. weekday peak period. The traffic analysis for this Draft AUAR should reflect this change in freeway access. For instance, the traffic analysis in the Draft AUAR shows Level of Service (LOS) F at the intersection of 5th Street and 11<sup>th</sup> Avenue, which would be much less if there was no freeway traffic exiting at 5<sup>th</sup> Street; and the analysis does not include the intersection of 7th Street and 11<sup>th</sup> Avenue, which would experience much greater traffic delays if the westbound I-94 traffic was exiting onto 7<sup>th</sup> Street.

E Furthermore, the Draft AUAR evaluates a 2035 No Build Scenario built on a background traffic growth rate of 0.5 percent per year. The Maximum and Minimum Development Scenarios are evaluated with four roadway options, none of which represent the existing roadway configuration. While it is possible to directly compare among the Build scenarios, including resultant conditions after proposed mitigation, it is not possible to directly compare to scenarios that involve no closures or restrictions on the existing street network. We request this additional analysis in order to more specifically determine impacts on regional highways and on Metro Transit LRT and bus operations and level of service.

Mitigation Strategies Impacting LRT (James Harwood, 612-349-7339)

F The Draft AUAR identifies Mitigation Strategy 21.3 “Reduce LRT green band between City Hall and Downtown East Stations.” Because of negative impacts on LRT operation, the table identifies a potential impact of “Impacts to LRT delay and schedule.” A Potential Secondary Mitigation measure is identified as “Installation of LRT detection on 5th St at Park Ave, 5<sup>th</sup> Ave, and 4th Ave.” The Metropolitan Council cannot determine the impact, appropriateness, or effectiveness of these strategies against alternatives without further analysis and context. Overall downtown signal optimization and transit prioritization/progression for LRT should be included in the discussion and analysis. The Final AUAR should also address the potential impact of modifications to Chicago Avenue on LRT operation at the Downtown East LRT Station.

**Section 27. Compatibility with Plans and Land Use Regulations**

Minneapolis Comprehensive Plan (Michael Larson, 651-602-1407)

- C:** Additional information has been added to Section 18 of the Final AUAR document regarding the Metropolitan Council Interceptor I-MN-310 as requested in this comment.
- D:** The City recognizes that there is TED funding for the repurposing of the 5<sup>th</sup> Street exit ramp by adding a new 7<sup>th</sup> Street exit ramp from westbound I-94. However, the project is not fully funded or programmed, and therefore has not been evaluated as part of this AUAR. It is expected that the 7<sup>th</sup> Street exit will result in rerouting of traffic from 5<sup>th</sup> Street to 7<sup>th</sup> Street near 13<sup>th</sup> Avenue S and 11<sup>th</sup> Avenue S. The change is not anticipated to have any effect on regional distribution of background and site-generated traffic. Intersections in the project area are expected to experience changes, including traffic reductions along 5<sup>th</sup> Street, and traffic increases along 7<sup>th</sup> Street. The final roadway configuration will be evaluated by the City as part of the ramp development project, and the City will implement any modifications that may be required at that time.
- E:** The potential restrictions on Park and Portland Avenues (Roadway Options 1 through 4) are no longer under consideration. Option 4 most closely resembles a Baseline Roadway Network option, with only a reduction of one lane during peak hours. Option 4 is now called the Baseline Network Option in the Final AUAR. A comparative analysis of Option 4 and the Baseline Network Option has been conducted. The Baseline Network Option results in nearly identical mitigation measures with one exception: changes to signal timing for the LRT green band are no longer a recommended mitigation strategy for the Minimum Development Scenario. The signal timing change, and potential addition of LRT detection, remains as a recommended mitigation strategy for the Maximum Development Scenario.
- F:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required, thus resulting in no changes to Chicago Avenue.

G Section 6 of the Draft AUAR states that both scenarios, including the Maximum Development Scenario, are well below the maximum density allowed under the comprehensive plan. However, Section 27 acknowledges that the *“potential closures of Park and/or Portland Avenues create some conflict with transportation elements of the plan, which encourage maintenance of the street grid and reconnections where possible to encourage connectivity for all modes of travel (bicycles, pedestrians, vehicles, etc.). The disconnect or interruption caused by potential roadway block closures would not be supportive of this element.”* Furthermore, the proposed park component is neither in the City’s comprehensive plan nor in the Minneapolis Park & Recreation Board Comprehensive Plan. The Final AUAR should state whether or not these factors, including closure or modifications to arterial roadways, would warrant an amendment to the City’s comprehensive plan.

H Minneapolis Park & Recreation Board Comprehensive Plan (Jan Youngquist, 651-602-1029)  
The Draft AUAR includes a public plaza/park in both development scenarios and explicitly states that the plaza/park will be controlled by a “yet-to-be-determined” public agency. Figure 5-2 of the Draft AUAR depicts that the public plaza/park would be located on Blocks 4 and 5 under the Minimum Development Scenario and on Block 5 and the eastern two-thirds of Block 4 under the Maximum Development Scenario. Table 9.2 of the Draft AUAR indicates that there are ten potentially contaminated sites within the Draft AUAR area, including two potential active sites. Block 5, which is shown as the public plaza/park under both scenarios, is fully comprised of the Star Tribune property located at 425 Portland Avenue. According to Table 9.2, this property is the site of two inactive leaks, an inactive tank and active hazardous waste activity. Section 20 of the AUAR describes the proposed mitigation for contamination, although it is unclear whether these activities would be assumed by the developer or by the public agency who would own the plaza/park. The site should be remediated to residential environmental cleanup standards that would support public recreational use, prior to being transferred to the public agency who would own and operate the plaza/park.

I Regional Highway System (Russ Owen, 651-602-1724)  
The Draft AUAR acknowledges that Park and Portland Avenues are currently designated as A-Minor Arterials in the Regional Highway System, under the jurisdiction of Hennepin County. The Final AUAR should articulate the process by which jurisdictional or functional classification would change, and the likelihood of that change under each Roadway Option.

**Section 28. Impact on Public Services**

J Transit (Steve Mahowald, 612-349-7775)  
The Final AUAR should be corrected with regard to bus routes listed on page 64. With the opening of the Green Line service in 2014, Routes 50 and 144 are scheduled for elimination and Route 16 will not operate west of the Stadium Village Green Line Station. Also, the westbound Route 14 has recently been rerouted through downtown and is now operating on 5th Avenue between 8th and 4th Streets.

K The Draft AUAR states that *“expansion of existing routes and/or implementation of new transit routes may be necessary to serve the AUAR Study Area under either of the proposed Development Scenarios. In addition, if closure of Park and/or Portland Avenues is included in the selected scenario, rerouting of selected bus routes would be necessary.”* Transit service is already significant on 4th and 5th Avenues South, and these streets have the potential for use by expanded peak period express service to serve growth and development in downtown

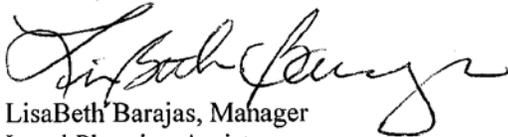
- G:** Closure of Portland and/or Park Avenues is no longer included as part of the proposed project. The City of Minneapolis has noted that the park element does not require an amendment to the comprehensive plan.
- H:** Comment noted. Any necessary remediation of the site will be coordinated with applicable regulatory agencies, and an agreement governing the entity(ies) responsible for remediation will be established as part of the purchase and/or maintenance agreement.
- I:** Closure of Portland and/or Park Avenues is no longer included as part of the proposed project. Functional classifications of these roadways would not change as a result of the proposed project.
- J:** Updated text has been added to reflect these route changes.

Minneapolis (generally) and Downtown East (specifically). Despite the intersection LOS traffic analysis with the proposed mitigation measures, restrictions on Park and Portland Avenues, and any mitigation measure related to these closure(s), has the potential to degrade long-term capacity and operational effectiveness of these streets for transit, with resultant impacts on modal splits identified for the development's trip generation. This potential impact should be addressed by the Final AUAR. Finally, given the focus of bus transit services on South 3<sup>rd</sup> Street, South 4<sup>th</sup> Street, 4<sup>th</sup> Avenue South and 5<sup>th</sup> Avenue South within the AUAR study area, directing site access or other curb cuts for the proposed developments to Park and Portland is preferred.

L Finally, the discussion of potential impacts to transit in this section should incorporate the transit-related issues addressed above under Section 21 - Traffic.

This will conclude the Metropolitan Council's review of the Draft AUAR. Please note that the Council will take no formal action on the document. Please contact the listed technical reviewers or Michael Larson, AICP, Principal Reviewer, at 651-602-1407 with any questions.

Sincerely,



LisaBeth Barajas, Manager  
Local Planning Assistance

cc: Julie Monson, MHFA  
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division  
Gary Cunningham, Metropolitan Council District 7  
Michael Larson, AICP, Sector Representative/Principal Reviewer  
Raya Esmaeili, Reviews Coordinator

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**K:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.

As a result, site access on Park and Portland Avenue will be available in the Build condition. Specific details of curb cuts and site access have not yet been defined and will be developed as the project details are finalized.

**L:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.

With no roadway closures, no changes in transit routes are anticipated.

Further evaluation of Park and Portland Avenues at full (existing) capacity was completed. With full capacity of Park and Portland Avenues, unacceptable delay is predicted to occur at the intersection of Park Avenue S at 5<sup>th</sup> Street S for the Maximum Development Scenario only. Mitigation strategies for either signal retiming and/or implementation of train detection at the intersection of Park Avenue S at 5<sup>th</sup> Street S are recommended mitigation strategies for future consideration under the Maximum Development Scenario. However, for the Minimum Development Scenario, the signal retiming for the LRT green band is not a recommended mitigation strategy. Signal timing revisions, if any, can be done without impacting LRT schedule and progression along 5<sup>th</sup> Street.



**Hennepin County Public Works  
Strategic Planning & Resources Department**

701 Fourth Avenue South, Suite 400  
Minneapolis, Minnesota 55415-1843

Phone: 612-348-4077  
Fax: 612-348-9710  
www.hennepin.us

September 18, 2013

Ms. Hilary Dvorak  
City of Minneapolis  
250 South 4<sup>th</sup> Street, Room 300  
Minneapolis, MN 55415

Re: Comments to the Downtown East Development – Draft Alternative Urban Areawide Review and Draft Mitigation Plan, as posted by the Environmental Quality Board August 19, 2013

Dear Ms. Dvorak:

This letter provides comments as noted above and as follow-up to comments previously submitted by Hennepin County on July 25, 2013 for the pre-draft Alternative Urban Areawide Review (AUAR) and Mitigation Plan for Downtown East. As outlined below, many of the questions initially raised remain as issues in the draft AUAR.

The roadway options considered by the draft AUAR include:

- Option 1 – Complete closure of Park and Portland Avenues between 4th & 5th Streets
- Option 2 – Closure of Portland Avenue only between 4th & 5th Streets  
Park Avenue would be modified to a 2-lane, no parking – open in peak hours only
- Option 3 – Closure of Park Avenue only between 4th & 5th Streets  
Portland Avenue would be modified to a 2-lane, no parking – open in peak hours only
- Option 4 – Park and Portland Avenues would be each modified to 2-lanes, no parking – open in peak hours only

Since the release of the draft AUAR, based on information provided and confirmed by the developer, roadway Options 1 and 3 outlined in the draft AUAR are no longer being considered with this proposed redevelopment. Therefore, this review of the draft AUAR will include comments pertaining to roadway Options 2 and 4 only.

A It is important to note that Options 2 and 4 still result in the closure of one or both of these county arterial roads. Option 2 includes a complete closure of Portland Avenue and a partial closure of Park Avenue, and Option 4 involves a partial closure of both Park and Portland for all hours except peak hours. While the County generally supports the visions of both Downtown East Development scenarios described in the AUAR, it is not supportive of the road closures as described, but would be willing to entertain temporary closures for events and special situations.

**A:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required. Any temporary special event closures would be coordinated between the City and Hennepin County.

B As part of this large project, the AUAR proposes creating a continuous public plaza/park parcel, providing a more direct connection to the LRT plaza and stadium, providing sizable green space and community gathering area in an otherwise urban environment, and enhancing the safety of fans entering and exiting the new stadium's west entrance as benefits to closing one block of Park Avenue. These benefits to the road closures are not supported by analysis or facts and imply that no other measures can be taken to accomplish the same goals. In fact, more direct connection to the stadium and enhancing the safety of fans entering and exiting the stadium's west entrance can be accomplished equally well by simply closing Portland during stadium events. Furthermore, the closure of Park Avenue does not significantly decrease the amount of green space that can be provided and does create significant adverse consequences for traffic and access to essential public services. Finally, high quality urban design, use of materials and creative placemaking could all be explored to provide the same quality of community gathering area and sense of connection between the two blocks.

### General Observations

- C
- ***Any change in the function or continuity of these roadways will have significant impacts to traffic operations and the surrounding roadway network.*** These impacts have been confirmed by the traffic analysis completed for the draft AUAR which are summarized from the detailed analysis provided in the Downtown East Traffic Analysis Technical Memorandum (Kimley-Horn, August 2013).
- D
- The potential one-block closures of Park Avenue and Portland Avenue in downtown Minneapolis will sever portions of the existing roadway grid system, reducing the flexibility and resiliency of the system to handle day-to-day changes in traffic flow. ***The proposed break in the roadway network will reduce capacity, break roadway connectivity, require transit route shifts, and reduce access and mobility for emergency vehicles.***
- E
- These roadways provide vital access and connectivity for emergency vehicles and county services, in addition to general commerce in downtown Minneapolis. The Hennepin County Medical Center's Emergency and Level 1 Trauma Center, uses Park and Portland Avenues as primary access routes to transport patients. HCMC treats 1500 – 2,000 patients each weekday on its main campus and access to the campus is of concern for patients traveling from the north and west end of the City. Closure will increase time to care for patients experiencing emergency situations. Closing Park and Portland would further restrict routing options for Hennepin ambulances leaving home base, which would contribute to longer ambulance response times. While we estimate the average delay to be about 2 minutes per run from home base to northeast and southeast Minneapolis, we would expect the effect of not having Park and Portland available as options to be exacerbated during periods of heavy congestion due to events at the stadium, rush hour, and bad weather. It has been verified that EMS response time is a critical factor when transporting patients suffering from conditions. ***Increasing response times for emergency vehicles and impeding Hennepin County services is a particularly troubling impact.***
- F
- The draft AUAR includes mitigation strategies that utilizes non-routine multi-lane turn designations, removes on-street parking, and identifies the needs for additional right-of-way in highly constrained areas. ***We question the feasibility and practical nature of many of these proposed mitigation strategies.***

- B:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.
- C:** See response to Comment B. Functional classifications of these roadways will not change as a result of the proposed project.
- D:** See response to Comment B.
- E:** See response to Comment B.
- F:** See response to Comment B. The non-routine and multi-lane turn designations have been removed from consideration. The mitigation strategies that remain are all viable strategies.

G | 

- Metro Transit has numerous routes along these corridors. Their service provides an integrated system that is based on timely and strategic connections. Any disruptions to the system can result in significant changes to a network of established transit routes. ***In addition to transit, resolution to impacts for other modes such as pedestrians and bicyclists are not directly addressed by the draft AUAR.***

H | 

- While the draft AUAR notes that the proposed Downtown East development is consistent with the city's comprehensive plan (Minneapolis Plan for Sustainable Growth), it is not clear whether the traffic analysis and mitigation plan have fully incorporated the assumptions of growth in the East CBD area. As an example, The Downtown East / North Loop Master Plan (2003) anticipates significant additional development beyond that described in the AUAR. It is unclear whether the traffic analysis background traffic growth assumption reflects the true potential of the area. ***Care should be taken that the proposed development in the AUAR does not consume all the remaining system capacity, leaving no system capacity for other future development/redevelopment.***

I | 

- Discussion has occurred regarding the potential to revoke the County State Aid Highway (CSAH) designation of Park and Portland Avenues to accommodate the currently proposed roadway options. ***This discussion diverts attention from the fact that despite the roadway ownership, these corridors provide an important function for downtown Minneapolis throughout all hours of the day.***

J | 

- The draft AUAR does not address the traffic impacts beyond the immediate study area. The proposed roadway closures would result in diversion of traffic to the larger roadway network. ***The expected impacts beyond the immediate study area should be addressed in the AUAR.***

### Specific Comments: AUAR Question 21: Traffic

#### *Pages 23-25 (2035 No Build Conditions)*

K | 

- Page 24: There appears to be an oversight in the summaries of the no-build traffic analysis. The results identify four intersections that will operate at an unacceptable LOS E or F during the a.m. and p.m. peak periods. However, Table 21-2 shows five intersections, including the intersection of 6th Street and 11th Avenue, which will operate at LOS F during the p.m. peak period.

#### *Pages 25-30 (Traffic Forecasts)*

L | 

- Page 25 of the AUAR states that the trip estimates for the proposed redevelopment are based on the 9th Edition of the ITE Trip Generation Reports. Table 21-3 on Page 27 shows the ITE Trip rate for general office as 1.21 for the a.m. peak hour period. Based on our review of the current ITE Trip Generation Reports, the average trip rate for general office per 1000 square feet is 1.56. Using the fitted curve equation would result in a trip rate of 1.13 for 1,400,000 square feet of office during the a.m. peak hour. Similarly, the ITE trip rate for general office per 1000

- G:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required. The non-routine and multi-lane turn designations have been removed from consideration. As a result, no rerouting of transit routes will be necessary. In addition, no pedestrian or bicycle impacts are anticipated as part of the project. Skyway connections will provide new pedestrian routes in the project area.
- H:** Section 29 of the Draft AUAR addresses reasonably foreseeable development projects identified by the City (infrastructure and developments). The Minnesota Multi-Purpose Stadium and Washington Avenue improvements are addressed specifically in the AUAR. The Downtown East/North Loop Master Plan (2003) is a vision and strategy with 20-year projections but does not identify specific projects. The Downtown East Project includes components of all four attributes of a Complete Community from the Downtown East/North Loop Master Plan: office, residential, retail, and lodging. The project is also in line with the recommended land use for the area. This AUAR has incorporated all identified reasonably foreseeable developments and has captured the respective anticipated future background traffic volumes.
- I:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.
- J:** The study area for the traffic study was reviewed with Hennepin County staff as the project developed. Additional intersections were added to the analysis early in the process based on Hennepin County's comments. In addition, the section of the Draft AUAR titled Future Traffic Operations Analysis - Regional Network provides a planning level review of access ramps between the regional highway system and the local roadway system. No impacts were identified specifically as a result of the proposed project.
- K:** Comment noted. The list of intersections in the Final AUAR has been updated.

square feet during the p.m. peak hour is 1.49. Table 21-5 shows two different rates for the office land use (based on square footage): 1.20 and 0.72.

The 9th Edition ITE Trip Generation Reports was also reviewed for the apartment land use. The current ITE trip rate for apartments based on the number of dwelling units is 0.62 during the p.m. peak hour. Table 21-5 shows the ITE trip rate as 0.60 for the minimum development scenario and 0.36 for the maximum development scenario.

***Please specify if the average rate or fitted curve equation was used and verify that the trip estimation calculations in Tables 21-3 through 21-5 are correct with the specified reductions shown.***

*Pages 34-41 (Future Traffic Operations Analysis – Local Roadway Network)*

- M • Pages 35-38: In comparing the overall network delay for the p.m. peak hour between the minimum and maximum development scenarios (Tables 21-10 and 21-11) without the implementation of any mitigation measures, it would seem unlikely that the overall network delay would increase by only one second per vehicle for Roadway Option 4. Although Park and Portland Avenues remain open during the peak periods under this roadway option, an increase of one second per vehicle with an approximate increase of 75 percent (as we estimated from the tables) in site-generated trips seems counter-intuitive.
- N • Roadway Options 2 and 4 will both experience a significant traffic impact on the overall roadway system with several intersections identified to operate at LOS E-F. Intersections operating at LOS E-F will result in high levels of delay for motorists and significant queuing, resulting in frequent traffic signal cycle failures for drivers. This emphasizes the importance that the mitigation recommendations are feasible and deliverable to ensure adequate traffic operations in the project area.
- O • Page 40: We suggest verification of the increase for the overall network delay between no build conditions and the maximum build scenario. Based on our calculations for Roadway Option 2, the overall network delay increases by over 60 percent during the a.m. peak hour (50 percent is stated in the draft AUAR).
- P • Page 40: Maximum Development Build, Roadway Option 2, in addition to the intersections identified for No Build conditions and Roadway Option 4, the intersection of Washington Avenue/3rd Avenue will operate at an unacceptable level of service during the a.m. peak period.
- Q • Pages 40 and 41: The AUAR states that both the minimum and maximum development scenarios for the Roadway Option 2 with the park event will have a significant impact on traffic operations during the p.m. peak hour. The text on Pages 40 and 41 states the following “the increased traffic demands at the 4th Street/Park Avenue intersection caused that intersection to fail and impact multiple upstream intersections.”

There appears to be some inconsistency between the LOS results shown and the draft AUAR text. For example, the LOS results shown in Table 21-10 identifies a LOS D at the 4th

**L:** The traffic study used equations from the 9<sup>th</sup> Edition of the ITE Trip Generation Reports. The equations are inversely proportionate to the office size, so less office space results in a higher rate. A rate was calculated for this project based on an office size of one million square feet, which results in trip rates that are slightly higher than the currently proposed office space (1.4 million to 2.58 million square feet). The calculated rate based on one million square feet is 1.21 for AM peak hour, resulting in a traffic analysis that conservatively yields slightly higher traffic volumes.

Table 21-5 inadvertently showed rates from mid-day. The Draft AUAR analysis used the correct trip generation numbers, and the Final AUAR document is updated to show the correct rates, which are the same rate for both Minimum and Maximum Development Scenarios.

The apartment trip rates also use equations. The Table 21-5 corrections have been made using the calculated rate of 0.60.

**M:** SimTraffic analyses can result in significant variability in network delay. The delay per vehicle under Roadway Option 4 is the lowest of all options, and shows the least difference between the Minimum and Maximum Development Scenarios. While the trip generation is nearly 75% higher for the Maximum Scenario over the Minimum Scenario, the difference of approximately 830 trips/hour is a relatively small increase to the overall traffic volumes in and around the project area.

**N:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required. The non-routine and multi-lane turn designations have been removed from consideration. The mitigation strategies that remain are all viable strategies.

**O:** SimTraffic analyses can result in significant variability in network delay. While Option 2 has been dropped from consideration, the overall delay per vehicle has been verified that the information stated in the Draft AUAR document matches the modeling results.

**P:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.

Street/Park Avenue intersection. This is inconsistent with the text on Page 40, which describes this intersection as failing. In addition, the three intersections along Park Avenue directly upstream from 4th Street (including Park Avenue at 5th Street, 6th Street and 7th Street) are shown with an acceptable LOS D or better.

In addition, this AUAR text seems to understate the full impact of this scenario, and does not specifically identify all intersections that are impacted. For the minimum development scenario, 13 total intersections will operate at an unacceptable LOS E or F during the p.m. peak hour. The following five county roadway intersections will to operate poorly for this scenario (beyond intersections identified for No Build conditions and Scenario 2 – without a park event):

- Washington Avenue/Portland Avenue
- Washington Avenue/Chicago Avenue
- 3rd Street/Portland Avenue
- 4th Street/Portland Avenue
- 8th Street/Park Avenue

With the maximum development scenario, 29 intersections will operate at an unacceptable LOS E or F during the p.m. peak hour. In addition to the 4th Street/Park Avenue intersection and the five county intersections identified previously for the minimum development scenario, the following five additional county roadway intersections are expected to operate poorly with the maximum proposed development (beyond intersections that were identified for No Build conditions and Scenario 2 - without a park event):

- Washington Avenue/3rd Avenue
- 3rd Street/Park Avenue
- 5th Street/Park Avenue
- 6th Street/Park Avenue
- 7th Street/Park Avenue

- In addition to a review of the AUAR, a review of the Downtown East Traffic Analysis (dated: August 15, 2013) was completed. This traffic study was used as a basis and is referred to in the AUAR. In the section: Stadium Event Analysis, it is shown that during a weekday event arrival analysis, the future traffic volumes at many intersections will exceed capacity due to trips entering downtown for the event and traffic exiting downtown during the p.m. peak period. Some of the worst operational issues are expected on Washington Avenue, with the proposed roadway closures diverting additional traffic to this roadway.

In the Downtown East Traffic Analysis, the traffic operations become heavily congested when using the SimTraffic software, resulting in gridlock on the roadway network. In this case, the results shown in the traffic impact study were based on the Synchro software tool, which does not account for interaction between intersections and queuing affects when calculating intersection delay. These mitigated results do not appear in the draft AUAR, since a Traffic Mitigation Plan is proposed for the p.m. peak hour with a park event.

**Q:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.

The use of Synchro (microscopic traffic model) for traffic modeling in a downtown area does not account for the dynamics of a complex roadway network, such as in a downtown CBD area. As an industry standard, traffic modeling results documented for the Downtown East AUAR need to be based on the SimTraffic software (macroscopic model) to account for higher levels of congestion, queuing, and other factors such as pedestrian/bicycle traffic and parking maneuvers. The mitigation plan acknowledges that these traffic models typically do not account for all the various dynamics that occur in the CBD such as double-parking, temporary lane closures, police control at various parking ramp exits, etc. – this is another reason that supports a conservative analysis approach that compensates for these unmeasurable factors.

Pages 42-45 (Traffic Mitigation)

- S
- Page 42: Roadway Option 2 with the park event – As previously stated, this roadway option will have a significant impact on the roadway network. The mitigation measures identified in the AUAR identifies that a Traffic Mitigation Plan would be needed, with traffic control agents at critical intersections such as 4th Street/Park Avenue. It is important to reiterate that 13 and 29 intersections are identified with poor LOS E or F operations for the minimum and maximum development scenarios, respectively.
- T
- Some of these proposed mitigation strategies involve lane designations not frequently used by motorists at standard at-grade, full access intersections, such as dual right-turn lanes. For example, dual right-turn lanes are recommended for the intersection of Washington Avenue/4th Street (mitigation strategy 7).
- Prior to the acceptance of this mitigation measure as a viable intersection strategy, the installation of dual right-turn lanes should be studied further to determine the safety impacts at similar types of intersections. In practice, these types of installations have high crash rates due to driver confusion and limited decision distances. For example, in the draft AUAR, potential impacts for the proposed dual right-turn lane at Washington Avenue/4th Street are identified, including conflicts with bicycle traffic (with installation of a possible bikeway facility) and impacts to bus stop operations. Although potential conflicts are identified, solutions to these issues do not appear to be addressed in the draft AUAR.

Pages 75-87 (Draft Mitigation Plan)

- U
- In general, the Mitigation Plan should address the constraints, impacts, and the likely cost of options for the proposed mitigation measures. With limited space available in downtown Minneapolis for intersection improvements, further study must be completed to determine the feasibility of these mitigation measures.
- V
- We believe that there will be significant traffic impacts that may not be able to be mitigated in the practical sense, such as:
    - Right-of-way needed to implement the improvements will be difficult to obtain.

- R:** In heavily congested conditions, gridlock in SimTraffic simulations can be permanent for the modeling period as the software has limited ability to adjust driver behavior and maneuver vehicles the way human drivers would under special circumstances. Under the weekday stadium event scenario, the entire network comes to standstill early in the simulation period, and no further movement occurs. The results reported from SimTraffic would provide little information. Synchro results provide better differentiation in intersection operations. These weekday events will occur on rare occasions for Monday or Thursday Night Football (once in 2013 on a Thursday evening). SimTraffic modeling software is used for reporting results for all aspects of the AUAR, except for these rare weekday evening Viking event arrival period scenarios.
- S:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.
- T:** See response to Comment S.
- U:** See response to Comment S. The non-routine and multi-lane turn designations have been removed from consideration. The mitigation strategies that remain are all viable strategies, and the cost estimates will be incorporated into the final mitigation plan.

- Access to parking, specifically the parking garage with proposed access to Park Avenue will be difficult to maintain. It is neither practical nor reasonable to allow access to this parking garage during peak periods only.
- Based on past projects, proposals for the removal of on-street parking will likely be contentious.
- Impact of the potential roadway closures will have a significant impact on the surrounding roadway network within and outside of the study area.
- The effectiveness of the Traffic Mitigation Plan recommended for the Scenario 2 with the park event and the capability of the roadway network to handle the future traffic volumes with the proposed closure of Portland Avenue needs to be examined further.
- The proposed mitigation strategies may have an adverse impact on other modes of transportation (transit, pedestrians, bicyclists).

I appreciate your consideration of Hennepin County comments at this time and look forward to your response. If you have any questions, please contact me at 612-348-5714 or [david.jaeger@co.hennepin.mn.us](mailto:david.jaeger@co.hennepin.mn.us).

Sincerely,



David Jaeger  
Manager, Environmental Policy

cc: Jim Grube, Director of Transport  
Debra Brisk, Assistant County Administrator  
Michael Noonan, Manager, Real Estate Division  
Alene Tchourumoff, Director of Strategic Planning and Resources  
Peter McLaughlin, Commission District 4<sup>th</sup> District

**V:** Due to concerns raised by the City and Hennepin County, the Park and Portland Avenue permanent road closure options are not being carried forward; therefore, resulting closure impacts will not occur and no mitigation for such impacts is required.