

APPENDIX G

Comments and Responses to Draft AUAR
during official review period

Appendix G

Response to Comments on South Loop Alternative Urban Areawide Review (AUAR) Update May 2022

On March 15, 2022 the City distributed the South Loop District AUAR Update Report to the official distribution list as required by State Statutes (Sec. 4410.3610). During the 10-day comment period, the City received comments from five agencies. Responses to specific comments are provided below and the agency comment letters are attached.

Agency: Minnesota Pollution Control Agency – March 29, 2022

Comment: Climate Adaptation and Resilience (Item 7)

The AUAR Update discusses general approaches to resiliency but does not discuss climate change effects interacting with the specific project as directed in this section. It would be applicable to talk about the following environmental impacts specifically from the Project interacting with climate change: increased impervious surface (e.g. rainfall changes), increased water use (e.g. drought severity), and urban heat island effects (e.g. increased temperatures).

Response: It is noted that Item 7 is optional in 2022 and guidance for AUAR is not developed at this time. The comment appears to relate to Item 7.B, which our AUAR states we intentionally did not address given the AUAR does not deal with actual development proposals; but considers forecast future development. Without specific development proposals, it is not possible to describe *specific activities* or how the project will *specifically affect* various climate trends. That said, more clear or specific descriptions of current and potential future practices the City may implement to respond to the climate change impacts will be added to the AUAR narrative or Mitigation Plan, for example:

Regarding changes in impervious surface and increased rainfall, it is unlikely future development will result in increased impervious given the high amount of impervious existing on most redevelopment sites. All development proposals must comply with the various City codes and standards regarding allowed impervious and stormwater management, as well as regulations of other agencies (watershed districts, DNR, etc.). Redevelopment provides opportunity to reduce the amount of on-site impervious surface or increase onsite retention capacity through implementation of low-impact design practices such as use of pervious pavement, green roofs, underground pipe galleries, etc. While the City does not currently require these practices, we do not prohibit these practices, and we routinely encourage developers to consider using. Many recent private development proposals have incorporated such design practices. The City has also implemented some of these practices in public projects (e.g., Civic Plaza, park facilities).

As noted in the AUAR and Mitigation Plan, all development must comply with our Comprehensive Stormwater Management Plan (CSWMP) requirements. Our requirements were updated to align with Atlas 14 data, which reflects precipitation data based on newer rainfall records over the last 30 years. The City is currently working with our local watershed districts and other agencies to assess vulnerabilities from potential future “mid-century (e.g., 2050)” rainfall events. The City will continue to work with our partners to identify strategies to address changes to rainfall frequency and intensity.

Regarding increased water use, the City has a DNR mandated and approved Water Supply Plan, dated October 2017, that implements long term water sustainability, conservation, and critical emergency preparedness measures. The City has also adopted a Critical Water Deficiency ordinance that defines procedures to restrict water usage under certain emergency declarations. To further encourage reductions in water usage, the City has adopted the State Plumbing Code that regulates the use of low-flow plumbing fixtures for permitted construction. The City's water conservation activities are reviewed and documented annually during DNR Water Conservation Reporting.

Regarding urban heat island effects, the City has landscape standards that require a minimum number of overstory trees and other vegetation. These include requirements for parking lot landscaping, both perimeter and internal islands, which must be planted with deciduous trees to provide shade. The City is considering establishing sustainable development standards, which could include landscape guidance to enhance micro-climate benefits, such as planting deciduous trees on south/west sides of buildings to provide summer shade and allow winter radiant heat.

Comment: Water Resources (Item 12)

Surface Water - The only wetlands in the study area are in the floodplain wetland complex located in the bottomlands of the Minnesota River valley. This area is zoned "Conservation" and development in these areas is restricted to conservation and recreational uses. None of the redevelopment sites in the study area physically abuts the river and there is no public watercraft access to the Minnesota River in the South Loop District. However, care must be taken for any possible future construction as the Minnesota River is a 303d Impaired Water and is adjacent to the South Loop District. With the location of this impaired water, additional mitigation may be required and agreed upon by all permitting agencies. In addition, in-water best management practices (BMPs) may be required that may include weighted (double) floating silt curtain, low flow, no flow or winter construction conditions, and coffer and/or rock check dams to further protect this impaired water. For questions, please contact Bill Wilde at 651-757-2825 or William.wilde@state.mn.us.

Response: The City already has regulations in place via our CSWMP and Bluff Protection (BP) overlay zoning that address rates and volume of stormwater discharge as well as water quality, including standards regarding erosion control and vegetation removal. The AUAR and Mitigation plan describe many of the specific standards in place, for example, we require 90% total solids removal (turbidity TDML) and 60% total phosphorus removal (nutrient TDML). The Mitigation Plan will be revised to note construction stormwater permits are required for individual projects and required BMPs are tailored to the circumstances of individual projects and sites. These permits require restoration of disturbed soils within 7 days.

The City routinely implements a variety of BMPs and will continue to work with our partners to ensure our BMPs are effective and meet or exceed State requirements. The City is committed to work in cooperation with other permitting agencies regarding identification and implementation of additional mitigation approaches as needed.

Stormwater

- ***Because the redevelopment/new development areas are located immediately upgradient to the Minnesota River that has construction-related impairments, all construction activities in the area will need to adhere to additional erosion and sediment control BMP requirements specified in the MPCA National Pollutant Discharge Elimination System/State Disposal***

System (NPDES/SDS) Construction Stormwater Permit (CSW Permit)

- ***The AUAR Update discusses use of volume control and rate control to permanently manage stormwater at the site. The CSW Permit currently requires use of volume reduction practices to manage stormwater, such as green stormwater infrastructure to reduce stormwater discharges to adjacent surface waters. These practices encourage infiltration of stormwater or stormwater reuse. The AUAR does mention that the redevelopment could provide opportunities for green infrastructure. The city is strongly encouraged to require that the development incorporate these practices and consider incorporation of bio-infiltration areas where soils allow and tree trenches, pervious pavements, green roofs, etc., into the development. Use of these practices, not only meet permit requirements, but can also serve to address climate resiliency discussed in the AUAR Update. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.***

Response: As noted above, the AUAR and Mitigation Plan describe many of the standards and practices the City requires to address erosion and sediment control. We reiterate that many City standards meet or exceed State requirements. For example, the City requires retention of 1.1 inches of precipitation on sites that disturb 5,000 SF or more of new or fully reconstructed impervious surface area. This exceeds the State retention requirement of 1 inch.

The City routinely works with developers to encourage use of low-impact design and other BMPs, such as bio-infiltration, tree trenches, pervious pavement, green roofs, etc. The City identifies and recommends the specific approach/BMP that is deemed most effective for the specific site and development proposal.

It is noted that the City's MS4 permit was recently reissued and requires the City to update our SWPPP to be consistent with the MPCA Construction Stormwater Permit anticipated to be reissued in 2023. In addition, as stated previously, the City is considering adopting a "sustainable building and site design" policy and/or actual design standards that may require implementation of some of these practices in certain circumstances, such as projects requesting public funding assistance.

Agency: Metropolitan Council – March 29, 2022

Comment: Section 12. Water Resources / Appendix H. Section 2.0. Sanitary Sewer (Roger Janzig, roger.janzig@metc.state.mn.us)

The AUAR Update includes development scenarios that may have potential impacts on the capacity of the regional wastewater system, specifically the Metropolitan Council Environmental Services (MCES) Interceptor located at the intersection of East 90th Street and 18th Avenue South. Table 6.5 – Proposed Future Sanitary Sewer Projects in the Mitigation Plan proposes an increase in the size of the existing regional wastewater interceptor sewer from a 40-inch pipe to a 48-inch pipe (CIP Item #10). Please note that Council records indicate that the size of the existing interceptor is a 42-inch pipe. Council staff recommend that the City update their records to be consistent with the MCES inventory. Please also note that MCES requires further information and discussion about this conclusion, as the Metropolitan Council makes this determination for purposes of capital improvement planning.

The need for wastewater capacity improvements is associated with accommodating a scenario with an additional 3,945 residential units in the Study Area. Table 6.2 – Existing Land Uses and Updated Development Scenario Forecast identifies eleven development sites throughout the Study Area. There are development scenarios for four sites in the 2022 Future Build Scenario (2045 “full build”) that include new or additional residential units than previously analyzed: Apple Tree (832 units), Embassy/Park n Fly (548 units), Park n Go (581 units), and Bloomington Central Station (1,984 units).

Council staff strongly encourage that City staff coordinate with MCES Wastewater Planning and Community Program Manager, Kyle Colvin (kyle.colvin@metc.state.mn.us), to determine the nature, likelihood, and extent of long-term wastewater capacity needs.

Response: It is noted that the pipe referred to as CIP Item #10 does not accept any sewer flows from the South Loop District, so future development in the study area will not affect the capacity of this pipe. This pipe segment was included in the AUAR given its proximity to the South Loop District. This pipe segment is identified in the City’s 2018 Wastewater and Comprehensive Sewer Plan as item 10A and was categorized as a “watch” item. Forecast development (west of the South Loop) indicates potential for future capacity issues in the regional interceptor at 90th and 18th by 2040 that will result in the need for a larger pipe (e.g., 48”). The City made this determination through use of the MCES parameters and peaking factors to estimate future capacity needs. The City will continue to work cooperatively with the MCES to monitor development - both within the South Loop and beyond - and identify needed capacity upgrades to the regional system.

It is noted that several CIP projects (i.e., #10, 22, and 26) listed in the AUAR, Table 6.5 and depicted on Figure 12.6 are physically located outside of and do not accept flows from development in the South Loop District. We will revise Table 6.5 and Figure 12.6 in the AUAR and Mitigation Plan to remove these CIP projects.

Regarding additional residential units forecast in the revised AUAR development scenario, changes to development forecasts since the last AUAR update in 2017 are described on p. 6 of the AUAR. The changes reflect a continued shift in land use away from office and retail to more hotel and residential development by 2040 or 2045. Impacts related to these land use shifts can be accommodated by the public infrastructure improvements described in the AUAR. As noted above, future development in the AUAR study area (South Loop) is not anticipated to impact the regional wastewater system.

Comment: Section 10. Land Use (Jerome Benner, 651-602-1494; Todd Graham, 651-602-1322)
Council staff note that if 90% of the development identified in Table 6.2 is absorbed into the market by 2040, it would add approximately 7,000 jobs, 2,000 households, and 4,000 population to the Study Area.

The development scenario in the AUAR Update contrasts with City’s 2040 comprehensive plan allocation of forecasts for its Transportation Analysis Zones (TAZs). The Study Area is encompassed by Metropolitan Council TAZs #1526-1531. These six TAZs are currently forecasted to gain 11,000 jobs, 1,530 households and 2,650 population from 2014 to 2040. The City acknowledges that future amendments to the City’s Plan may be required to accommodate the development scenario. Council and City staff may wish to consider higher household and population forecasts and a lower employment forecast for these TAZs. This can be accomplished during a future comprehensive plan

amendment. City staff are welcome to contact Metropolitan Council Research to discuss in greater detail.

Response: The changes to jobs, households, and population noted reflect land use shifts that were underway in the last AUAR update in 2017. The updated AUAR development scenario acknowledges a continuation of these changes, which include an overall reduction in total development (square footage) and a shift away from office and retail to more hotel and residential uses.

The AUAR development scenario anticipates development that may occur through 2040. Much of the anticipated development will not occur before the next AUAR update (within 5 years) or before work on the next comprehensive plan update gets underway in 2025. It is also noted that the City will begin work to update the South Loop District Plan (SLDP) in 2023. This update will incorporate the most current development forecasts. Approval of the SLDP update will involve a minor amendment to adopt the district plan by reference into the City's comprehensive plan. The text in Section 10, B. Compatibility will be revised to note that, if warranted, updates to forecasts in TAZs #1526-1531 can be made at the same time the SLDP update amendment is considered.

Comment: Section 20. Transportation (Russ Owen, 651-602-1724)

The AUAR Update, on page 65, identifies roadway improvements to address traffic operational issues under year 2040 conditions. These include a proposed I- 494/Thunderbird Road Eastbound Ramp. This would mitigate forecasted Level of Service (LOS) F at Lindau Lane/Ikea Way, Lindau Lane/22nd Avenue and the 494/24th Avenue interchange. Please continue to work with MnDOT to understand the engineering feasibility of this proposed improvements well as its consistency with criteria for highway interchanges in the 2040 Transportation Policy Plan (Appendix F). Requests for interchange modifications require review by the joint MnDOT/Metropolitan Council Interchange Planning Review committee. An Interstate Access Request to the Federal Highway Administration (FHWA) may also be required.

Response: The City will continue to work with MnDOT regarding the design and feasibility of the I-494/Thunderbird Road eastbound ramp, as well as any other roadway projects involving MnDOT. In addition, Table 9.1 will be modified to add a line item "Joint MnDOT/Metropolitan Council Interchange Planning Review Committee" under Unit of Government (State) regarding requests for interchange modifications. Also, "Interstate Access Request" will be added as a type of permit or approval under Federal associated with FHWA.

Comment: Section 20. Transportation (John Dillery, Metro Transit, 612-349-7773)

The AUAR Update details improvements to address traffic operational issues under year 2040 conditions. The AUAR Update recommends the following improvements should LRT service increase in frequency over current conditions:

- ***American Blvd & 34th Avenue: Grade separation options should be considered.***
- ***East Old Shakopee Rd & 24th Avenue: Grade separation options should be considered.***

As the City is aware, the performance of these intersections on the METRO Blue Line are being studied as part of the Riverview Corridor study. There may be new opportunities to positively resolve the traffic issues that are identified in the AUAR Update.

Response: The South Loop District Plan, adopted in 2012, identifies a grade-separated pedestrian crossing over 34th Avenue near American Boulevard, however this is listed as a future project without a

year assignment in the City’s Capital Improvement Plan (CIP). In addition, the Riverview Corridor project proposes this intersection as a potential grade separation. It is not known at this time which option will be necessary, but future AUAR updates will incorporate any final decisions. As noted above, an update to the SLDP is anticipated to begin in 2023 and will also consider the feasibility of grade-separation in this area and other potential grade-separated crossings in the district.

The existing grade-separated pedestrian crossing over Killebrew is less than a block west of the intersection of EOSR and 24th Avenue. The City has had preliminary discussions with the property owner (MOA) about a grade-separated pedestrian crossing in the vicinity of 24th Avenue and 82nd. Such a crossing would likely occur in conjunction with future development of the MOA Phase 3 site (aka Adjoining Lands). This crossing too will be further studied during the pending SLDP update.

Agency: Hennepin County – March 29, 2022

Comments focused on the **Infrastructure Improvement Study (Appendix F)**

General Comments

- ***Few concepts/modifications prioritize people walking, rolling and biking. Suggest prioritization of mode shift and pedestrian connectivity in the area vs just existing usage, especially considering 4 LRT stations in proximity. Many of the proposed changes prioritize vehicular expediency and fail to promote alternative modes. Further analysis is needed to determine the preferred locations for bike facilities (especially regional trail(s)) with consideration for destinations, network connections and conflict reduction.***

Admittedly, the Infrastructure Improvement Study (Appendix F) focuses on roadway improvements to ensure adequate motor vehicle capacity is available to accommodate forecast development. However, the South Loop District Plan (SLDP), recommends several bike/pedestrian routes and “green street” improvements to create a connected network throughout the district. Further analysis of alternative transportation modes will be included in the pending SLDP update. In addition, the City approved the South Loop Streetscape Master Plan in 2013 which identifies a hierarchy of street typologies and associated design standards, including incorporation of bike/pedestrian enhancements. The City uses the guidance in this plan when streets in the district are scheduled for reconstruction or major upgrades.

- ***Generally, no concerns raised from a traffic operations standpoint. We support the utilization of VISSIM software in modelling.*** No response needed
- ***What growth rate(s) were used in the 2040 Conditions?***

Response: An annual background growth rate of 0.5% was applied to through trips along American Boulevard. A background growth rate was not applied to the other roadways.

- ***What is being done as far as adding park/green space to the District either thru redevelopment, preservation, or intentional conversion of surface parking?***

Response: The SLDP recommends establishing a district-wide network of parks and open spaces connected by off-street trails and enhanced “green streets”. Typically, these would be constructed in

conjunction with private development proposals and/or reconstruction of public streets, as was the case with Central Park in Bloomington Central Station. While the study in Appendix F only describes roadway projects, there are several trail related projects described in the AUAR Section 10. In addition to the SLDP, trail projects are also identified in the City's Alternative Transportation Plan (ATP, adopted in 2016) and South Loop Streetscape Master Plan, including a trail along 24th Avenue that will need to be implemented in coordination with Hennepin County.

- ***We support greater efforts of intentional connectivity and wayfinding between the South Loop District and the natural amenities of the MN Valley National Wildlife Refuge***

Response: The City agrees and has affirmed support for connectivity and wayfinding in various plans, most notably the SLDP and the South Loop Streetscape Master Plan. In 2017 the City engaged a sign design consultant to prepare concept plans for district-wide wayfinding signage. Given the amount of pending development, the City will pursue construction of wayfinding signs once destinations stabilize.

The SLDP recommends adding four new trailhead access point into the MVNWR. The City coordinated with USFWS staff regarding the proposed locations of these trailheads. Some are located on private property (e.g., Kelley Farm) and would be considered at the time a redevelopment proposal is presented. There is funding for a new trailhead at 33rd Avenue and East Old Shakopee Road, however right-of-way is needed for this location. The property owner is exploring sale of the parcel to a private developer. The trailhead may be constructed as part of the private development.

- ***Sidewalks and trails should have significant boulevard separation from roadways. When modifying roadway geometry, maintain most direct walkway/paths (avoid meandering)***
- ***General support of free-right turn lane removal where turning radii allows. Enhance porkchops for greater pedestrian comfort where not feasible***

Response: The City appreciates the feedback and will take these comments into consideration with specific project design.

Comment: Pg 17 – TH 77 / E Old Shakopee Rd interchange: General support to further study removal of Glenview Ln access and continuous movement intersection

Response: The City appreciates the feedback and will take this comment into consideration with specific project design.

Comment: Pg 18, 23 - Priority 1 Improvement (I-494/24th Ave)

- ***Triple WB left-turn lanes and dual EB right-turn lanes proposed would seem to promote high speeds and weaving and further discourage pedestrian and bike crossings***
- ***Please clarify - Is this diverging diamond interchange really the preferred location for a regional trail crossing over I-494?***
- ***How are u-turns from WB ramp addressed?***
- ***Consider passive detection for people walking and biking on the east-side of 24th Ave (County Road 1) through the EB on-ramp to I-494***

Response: The City appreciates the feedback and will take these comments into consideration with specific project design. Regarding the regional trail crossing, the City of Richfield is currently constructing a TH 77 underpass that will provide pedestrians and bicyclist access to the South Loop area. The City is interested in exploring crossing alternatives with area partners.

With regard to the WB U-turn, there is a left turn arrow at the single point interchange that would allow a U-turn onto the ramp if traffic was coming from westbound and wanted to return to eastbound on the freeway.

Comment: Pg 23 to 25 Priority 7 Improvement (24th Ave – I-494 to Killebrew Dr/E Old Shakopee Rd)

- ***Enhanced bikeway along east-side of 24th St may be desirous. While not currently on the county bike plan, we are open to further study. Off-road trail will need wide boulevard separation and need to minimize vehicular access/conflict points along 24th***

Response: The City agrees a bikeway may be desirous along 24th Ave and notes that it is a recommendation in the SLDP.

Comment: Pg 24 - 24th Avenue at 79th Street

- ***We recommend consideration of removal of this signalized intersection, ideally before development so as to not be assumed in retention***
- ***Regardless of future of signal, SB left-turn lane should be removed. Only used for unwelcomed u-turns***

Response: The City agrees with these comments and will take into consideration with specific project design.

Comment: Pg 24 - 24th Avenue at Lindau Lane

- ***Are two existing WB receiving lanes along Lindau Ln needed with only one WB approaching lane? Could widen N-S pedestrian crossing refuge with this space***
- ***In the southeast quadrant if free-right cannot be removed, bikes and peds should both cross free-right perpendicular at same location along pedestrian ramps***

Response: There are dual left northbound to west bound lanes so both receiving lanes are needed. Regarding the southbound to eastbound lane, currently one left turn lane is striped out but both receiving lanes were constructed as forecast traffic growth indicates the need for dual lefts in the future. The need for these lanes, as well as the feasibility to modify or remove, can be evaluated during preparation of design concepts for 24th Avenue in the future.

Comment: Pg 24 - 24th Avenue at Killebrew Dr/Old Shakopee

- ***Support removal of free-right in NE quad and SE if feasible. Need for 'No turn on red' to avoid LRT crossing conflicts***

Response: The skew of the intersection supports the need of the free right turn lanes and the City support a design that slows traffic. It is noted that the SE quad free-right was recently reconstructed to improve sight lines for bikes and pedestrians and encourage slower turning speeds. The right turn on red is being handled either by gates or blank out signs near the LRT.

Comment: Pg 70 - Access

- ***Avoid new RIRO access south of 82nd. Development site should guide all vehicle access to 82nd Ave to reduce ped/LRT crossing conflicts***
- ***Development south of 82nd Ave should heavily promote transit and LRT connections and minimize crossing conflicts of trail and tracks***

Response: Access to this large “super block” development site (Adjoining Lands) must be provided. The City encourages access from 82nd Street, as currently exists, and discourages crossing of the LRT tracks. It is noted that the City, and others, including the County, have been in conversations about the potential realignment of the LRT to accommodate the Riverview BRT. The City will continue to work with its partners to ensure access is provided to all parcels in a manner that is safe and adequately serves existing and future site development.

The City supports enhanced access to transit throughout the district and routinely works with developers in this regard. As noted above, a grade-separated pedestrian crossing in the vicinity of 24th Ave and 82nd St will be considered with redevelopment of the MOA Phase 3 (aka Adjoining Lands) site. This crossing would provide direct access to the recently renovated MOA Transit Center.

Comment: Pg 73 - Nine Mile Creek Regional Trail

- ***Align E-W regional trail with any grade-separated crossing of 24th Ave***

Response: The approved route for the Nine Mile Creek Regional trail is along American Boulevard. Any changes to the alignment would need to be approved by Three Rivers Park District. At this time, there are no plans for a grade-separated crossing at 24th and American. However, the City is open to consider the merits of a crossing in this location in conjunction with the SLDP update.

Comment: Pg 107 – Old Shakopee Rd Sidewalk Gap

- ***County staff welcome coordination with City staff on further coordination to eliminate sidewalk gaps***

Response: The City appreciates the County support and welcomes the opportunity to coordinate and collaborate on efforts to eliminate sidewalk gaps in the district.

Comment: Pg 116 – Thunderbird Rd / I-494 EB ramp

- ***We support further study with MnDOT of this feasibility. While we recognize benefits to American Blvd and 24th Ave, there are significant concerns with merge/converge points along the ramp(s)***

Response: The City is committed to work cooperatively with MnDOT to study the feasibility and design of the Thunderbird Road/I-494 EB ramp concept for an appropriate layout that addresses the various needs as development occurs in the district. The text in Section 20 will be revised to make this clear.

Comment: Kelley Farm Site - The Minnesota River Valley is one of Hennepin County’s iconic natural resources, and Ike’s Creek in particular is the only place in Hennepin County that sustains a self-propagating brown trout population. While we understand the potential of this property to contribute to the tax-base and density in this area (and the value of both of those things), in this case we encourage the City of Bloomington to consider setting aside some additional parts of the Kelley Farm parcel (beyond the bluff overlay district) as planned conservation or park space to help protect Ike’s Creek and the Minnesota River bluffs. These natural resources are singular and irreplaceable for the

citizens of Hennepin County. They are threatened already by climate change and bluff top development will add to stressors. Note that the Hennepin County Landslide Interactive Map identifies at least three known landslides along the bluffs just north and south of this AUAR study area and around 30 data signatures indicating smaller undated landslide activity in blufflands adjacent to the Kelley Farm and Forest Glen Apartments. Hennepin County would be a willing and eager partner in any effort to increase conservation areas at the bluff top beyond the bluff overlay district.

Response: The City agrees the Kelley Farm site is a unique and beautiful property. We note that it is privately owned and there is currently no public access to the river valley or the expansive views from the bluff top on this property. Creation of open space in conjunction with development of the Kelley Farm property was recommended in the South Loop District Plan (SLDP). This plan also recommended enhancing access to the Minnesota Valley National Wildlife Refuge through provision of four new trailheads (including one on Kelley Farm site) as well as improving signage and wayfinding in the district. These ideas were vetted through USFWS staff, with the understanding that any new access/trailheads would be located and designed in cooperation with USFWS to ensure environmental impacts are minimized. The SLDP also affirms the Refuge as an area of passive, nature-based recreation.

The City would welcome the opportunity to partner with Hennepin County should opportunities arise to enhance protection and conservation of sensitive bluff and riparian areas. The City will explore opportunities to utilize park dedication to create additional buffer areas along the bluff. However, park dedication is only required when property is platted. This would likely occur if, and when, the current owner sells the property for development. It is noted that the amount of development proposed on bluff adjacent sites in the updated AUAR development scenario (Figure 6.2) is essentially the same as what was proposed in the original 2002 AUAR and/or the 2017 AUAR Update. All of these sites have been zoned and guided for urban/suburban intensity uses for many years.

The AUAR and the Mitigation Plan describe the City development controls in place that restrict development activity along the bluff and river valley bottom lands. These standards were recently updated to correspond to new requirements adopted by the Lower Minnesota River Watershed District (LMRWD). The City's Bluff Protection (BP) Overlay zoning creates a de facto buffer along the bluff and Ike's Creek ravine (see Figure 10.3). In addition to general development standards for lighting and landscaping, the BP-Overlay poses added limits on building heights, impervious coverage, vegetation removal, and land disturbance. New development must comply with these regulations. Figure 10.3 also depicts the area designated by the LMRWD as a "high value resource area". It is noted that City stormwater regulations are stricter than the recently updated LMRWD rules. As noted previously, City staff routinely encourage developers to incorporate low impact design elements that provide benefits beyond code requirements.

Agency: Minnesota Department of Natural Resources – March 31, 2022

Comment:

- 1. Page 14, Section 7, Climate Adaptation and Resilience. The DNR appreciates that the City of Bloomington has incorporated climate trend analysis into this environmental review document.***

Response: The City acknowledges the comment.

Comment:

- 2. Page 28, Geology. Please note that karst features have been identified within the Forest Glen Park Area in the vicinity of Ike's Creek. This area has been designated by the watershed district as a High Value Resource Area, and is also mapped as a Minnesota Biological Survey Site of Moderate Biodiversity Significance and a DNR Natural Plant Community (NPC) MHs37b - Red Oak - White Oak - (Sugar Maple) Forest. It is extremely important that effective stormwater management is used in this area to prevent groundwater contamination and protect this valuable natural resource.**

Response: As noted in the AUAR and Mitigation Plan, the City's stormwater requirements meet or exceed State requirements as well as the LMRWD requirements for High Value Resources Areas. Figure 10.3 identifies the High Value Resource Area designated by the Lower Minnesota River Watershed District. We will revise the AUAR to add text in Section 11 and Section 14 to acknowledge the presence of karst features, the Minnesota Biological Survey Site designation, and the DNR NPC designation. Section 14 will be revised to describe the natural plant community and rare species information provided by the DNR Division of Ecological Resources on March 31, 2022. In addition, Section 12 and Figure 12.1 will be revised to reference the LMRWD designated High Value Resource Areas.

Comment:

- 3. Page 39, Stormwater. The DNR recommends that the City of Bloomington consider using water from the stormwater ponds (where infiltration is not feasible) for irrigating landscaping, as is commonly done in the Cities of Medina and Hugo.**

Response: The City does not have requirements for reuse of onsite stormwater, but we do not prohibit it. We routinely work with developers interested in these approaches. However, we note that the Department of Health has restrictions that can make this challenging.

Comment:

- 4. Page 39, Stormwater. Because the stormwater from the project area ultimately ends up in the ecologically sensitive, Long Meadow Lake, it is important to note that the planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at [this website](#). Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations. We also encourage cities and counties to provide public outreach to reduce the overuse of chloride. Here are some [educational resources](#) for residents as well as a [sample ordinance](#) regarding chloride use.**

Response: As noted previously in response to MPCA comments, the City does not anticipate a significant increase in overall impervious coverage within the study area to accommodate forecast development. Most of the sites anticipated for redevelopment currently have high amounts of impervious area. It's possible some future road improvements will result in road widening, however,

redevelopment and changes in traffic patterns and volumes may result in reduction of some road segments (i.e., removal of some “free right”/slip lanes).

Redevelopment provides opportunity to reduce the amount of onsite impervious area and/or increase onsite retention capacity through implementation of low-impact design practices such as use of pervious pavement, green roofs, underground pipe galleries, etc. While the City does not currently require these practices, there are no regulations that prohibit these practices. The City routinely encourages developers to consider these design practices and many recent development proposals have incorporated them.

With regard to Smart Salting, the City’s MS4 Permit requires public education on impacts of salt use. The City partners with local watershed districts to conduct and host “smart salting” classes. We also publish information in our community newsletter (Bloomington Briefing) and via social media. The City also participates with local watershed districts as part of the Hennepin County Chloride initiative (HCCI) to educate property owners and managers on the impacts of salt use and provide resources to decrease salt use. It is further noted that the City currently has policy in place to reduce salt/chloride use on public streets and property as part of its snow and ice removal efforts. The Mitigation Plan will be revised to acknowledge current practices to reduce salt/chloride.

Comment:

- 1. Page 39, Stormwater. We recommend using BWSR-approved, weed-free, native seed mixes to the greatest degree possible in stormwater features, parkland, and landscaping in order to provide habitat for the federally endangered rusty patched bumblebee and other pollinators. The Board of Water and Soil Resources’ Lawns to Legumes website has many excellent resources related to selecting seed mixes and establishing pollinator habitat. Please also see this statewide Pollinator Plan and consider how the City of Bloomington can incorporate pollinator-friendly practices and ordinances into local projects. Stormwater features in particular provide an excellent opportunity to replace standard turf with a diverse plant mix that provides greater wildlife and water quality benefits.**

Response: The City routinely specifies use of BWSR seed mixes in public infrastructure projects where applicable. We have begun to replace turf grass with pollinator friendly mixes on public property (road medians, easement corridors, etc.) as opportunities arise. The City routinely educates and promotes use of pollinator friendly landscaping in its newsletter, social media, etc. The Mitigation Plan will be revised to acknowledge these practices.

Comment:

- 2. Page 46, Section 14, Rare Features. Please see the attached Natural Heritage Letter dated March 30, 2022 regarding potential impacts to state-listed species.**

Response: We appreciate DNR providing the updated information regarding rare and endangered species, which was not available when the draft AUAR was distributed for review. We will revise and update Section 14 accordingly. It is noted that the AUAR describes potential future development and not a specific project proposal currently under review. Many of the mitigation measures recommended by the DNR would be considered at the time an actual development project proceeds. The Mitigation Plan will be revised to describe these suggestion mitigation measures.

- 3. Page 48, Section 14, Rare Features. Please note that this section should discuss the state-listed**

species identified within the project area and how impacts to these species will be avoided. The majority of state-listed species are associated with the Minnesota River Valley National Wildlife Refuge and adjacent bluff area. The AUAR has previously discussed the Bluff Protection Overlay District, which provides building setbacks, stormwater requirements, and vegetation protection for the bluff area, which could also limit impact to wildlife. Some additional avoidance measures include:

Response: The Mitigation Plan will be revised to add additional detail to acknowledge the specific practices described below.

- ***Comment: Due to the presence of state-listed bats, please limit tree and shrub removal in June and July during the pup-rearing season.***

Response: The City already does this for City projects and is open to consider additional development timing restrictions for private development on bluff adjacent sites.

- ***Comment: Peregrine Falcons (state-listed species of special concern) have been documented nesting on buildings in the project area in the past, though we are not aware of any current populations. If any nests are observed during building demolition, please contact the DNR.***

Response: The City will commit to do this.

- ***Comment: Due to the presence of state-listed species within the project area, please limit erosion control blankets to natural netting materials, and specifically do not use products that contain plastic.***

Response: The City does this already; we use natural wood-fiber and jute netting, which break-down within 90 days.

- ***Comment: As much as possible, incorporate native planting and seed mixes into stormwater features and development landscaping.***

Response: The City already does this and will continue this practice.

- ***Comment: Inspect and clean equipment to prevent the spread of invasive species. Also, specifically use seed mixes and materials that are weed-free.***

Response: The City only uses seed mixes and materials that are weed-free. Regarding cleaning of equipment, such as mowers, we prioritize this practice and take great care to minimize spread of invasives in sensitive resources areas. However, we do not have the resources to do on routine maintenance citywide.

- ***Comment: Please note that the project area is also within the Audubon's Lower Minnesota River Valley Important Bird Area. Some strategies to reduce impact on bird species are to install bird diverters on electrical lines within the vicinity of the bluff. Lighting for any development along the bluff area will be important due to the proximity to the Minnesota River Valley National Wildlife Refuge and the many state-listed rare bird, bat, and insect species documented in the vicinity that***

can be especially sensitive to light. Should these developments propose to use LED luminaries, we recommend following the MnDOT Approved Products for luminaries, which limit the uplight rating to 0, and the maximum nominal color temperature to 4000K. These criteria meet known concerns for temperature and uplighting. Also, note that the USFWS has provided guidance in regards to lighting and preventing adverse impacts to the Northern Long Eared Bat. Their guidance in part says that for the Backlight, Uplight, Glare (BUG) rating system developed by the Illuminating Engineering Society, the goal is to be as close to 0 for all three ratings with a priority of "uplight" of 0 and "backlight" as low as practicable. To meet these criteria, please choose products that have the lowest number for backlight and glare (all approved products should already be 0 for Uplight).

*We also recommend that all non-essential lighting should be able to be turned off during the Mayfly hatch and also follow the Audubon 'lights out' program. This a program that darkens all buildings and structures during the bird migration from midnight to dawn March 15 - May 31 and August 15 - Oct 31. Information on this program is here:
<http://mn.audubon.org/conservation/lights-out-faq>.*

Response: City Code includes all the MnDOT standards except color temperature restrictions, where public safety is a primary concern. The Mitigation Plan will be revised to acknowledge our lighting practices.

Agency: Minnesota Department of Transportation – April 6, 2022

- **Comment: Right of Way:**

Please be aware that there are Mill and Overlay projects scheduled on both MN 77 between I-494 and the Minnesota River (scheduled for Fiscal Year 2022) and on I-494 between MN 77 and the Minnesota River in the upcoming year (FY 2023) - as well as some work on the wetlands.

Please direct questions concerning these comments to Doug Nelson, MnDOT Right of Way Area Manager at douglas.nelson@state.mn.us or telephone: 651-234-7583.

Response: Appreciate the updated information. We will revise the AUAR, Table 6.4 to add the two projects described above.

- **Comment: Traffic:**

The interim connections at Thunderbird Road to/from MN77 & I-494 Collector Distributor may constitute a change in access to the Interstate system, and would be subject to applicable rules and regulations.

Questions on these comments should be directed to Eric Lauer-Hunt, MnDOT Metro West Area Traffic, eric.lauer-hunt@state.mn.us or telephone: 651-234-7875.

Response: Comment noted. This project is included in Table 6.3.

- **Comment: Pedestrian/Bicycle:**

Table 6.3 in the AUAR details planned roadway improvements. In the table, line-item SL-16-006

mentions the construction of dual northbound right turn lanes onto eastbound I-494 ramps and signal timing improvements and possible ramp signalization. MnDOT would highly recommend that a Rectangular Rapid-Flashing Beacon (RRFB) be added to the dual right turn lane. Dual right turn lanes here can negatively affect pedestrian safety at the crossing. In regards to line-item SL- 16-007-which also mentions dual right turn lanes and ramp signalization- MnDOT would highly recommend that, due to the centerline merge on the ramp, dual right turn lanes not be constructed unless the ramp is signalized with clear “no turn on red” signage. MnDOT supports the free-right removals mentioned in line items SL-16-005, and SL-16-007.

MnDOT recommends coordination with Metro District Multimodal planning during the development of layouts for these projects.

Questions regarding these comments should be directed to Jesse Thorsen, MnDOT Metro Multimodal at Jesse.Thorsen@state.mn.us or 651-234-7788

Response: We note that Table 6.3 identifies MnDOT as a project partner. The City will continue to work cooperatively with all project partners in review and implementation of all projects listed.

- **Comment: Water Resources:**

Any redevelopment or projects adjacent to MnDOT Right-of-Way or connecting to MnDOT drainage facilities will require a MnDOT drainage permit to ensure that current drainage rates to MnDOT right-of-way will not be increased. The drainage permit application, including the information below, should be submitted online to: <https://dotapp7.dot.state.mn.us/OLPA/>

The following information must be submitted with the drainage permit application:

- 1) A grading plan showing existing and proposed contours.*
- 2) Drainage area maps for the proposed project showing existing and proposed drainage areas. Any off-site areas that drain to the project area should also be included in the drainage area maps. The direction of flow for each drainage area must be indicated by arrows.*
- 3) Drainage computations for pre and post construction conditions during the 2, 10, 50 and 100 year rain events.*
- 4) Time of concentration calculations.*
- 5) An electronic copy of any computer modeling used for the drainage computations.*
- 6) See also the attached Drainage Permits Checklist for more information.*

Once a drainage permit application is submitted, a thorough review will be completed and additional information may be requested.

Please direct questions concerning drainage issues to Jason Swenson (651-234-7539) or Jason.Swenson@state.mn.us of MnDOT’s Water Resources section.

Response: We will revise the AUAR, Table 9.1 (pp. 19-20) to note that work within ROW will require MnDOT permits (ROW, drainage).

- **Comment: Permits:**

In addition to the Drainage permits mentioned above, any use of, or work within or affecting,

MnDOT right of way will require a permit. Permits can be applied for at this site: <https://olpa.dot.state.mn.us/OLPA/>. Please upload a copy of this letter when applying for any permits.

Please direct questions regarding permit requirements to Buck Craig of MnDOT's Metro Permits Section at 651-775-0405 or Buck.Craig@state.mn.us.

Response: As noted above, this will be added to Table 9.1.

March 29, 2022

Julie Farnham
Senior Planner
City of Bloomington
1800 West Old Shakopee Road
Bloomington, MN 55431

Re: South Loop District Alternative Urban Areawide Review Update

Dear Julie Farnham:

Thank you for the opportunity to review and comment on the Alternative Urban Areawide Review (AUAR) Update for the South Loop District project (Project) located in Bloomington, Hennepin County, Minnesota. The Project consists of a mixed-use redevelopment. 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.

Climate Adaptation and Resilience (Item 7)

The AUAR Update discusses general approaches to resiliency but does not discuss climate change effects interacting with the specific project as directed in this section. It would be applicable to talk about the following environmental impacts specifically from the Project interacting with climate change: increased impervious surface (e.g. rainfall changes), increased water use (e.g. drought severity), and urban heat island effects (e.g. increased temperatures).

Water Resources (Item 12)

Surface Water

The only wetlands in the study area are in the floodplain wetland complex located in the bottomlands of the Minnesota River valley. This area is zoned "Conservation" and development in these areas is restricted to conservation and recreational uses. None of the redevelopment sites in the study area physically abuts the river and there is no public watercraft access to the Minnesota River in the South Loop District. However, care must be taken for any possible future construction as the Minnesota River is a 303d Impaired Water and is adjacent to the South Loop District. With the location of this impaired water, additional mitigation may be required and agreed upon by all permitting agencies. In addition, in-water best management practices (BMPs) may be required that may include weighted (double) floating silt curtain, low flow, no flow or winter construction conditions, and coffer and/or rock check dams to further protect this impaired water. For questions, please contact Bill Wilde at 651-757-2825 or William.wilde@state.mn.us.

Stormwater

- Because the redevelopment/new development areas are located immediately upgradient to the Minnesota River that has construction-related impairments, all construction activities in the area will need to adhere to additional erosion and sediment control BMP requirements specified in the MPCA National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit (CSW Permit).

- The AUAR Update discusses use of volume control and rate control to permanently manage stormwater at the site. The CSW Permit currently requires use of volume reduction practices to manage stormwater, such as green stormwater infrastructure to reduce stormwater discharges to adjacent surface waters. These practices encourage infiltration of stormwater or stormwater reuse. The AUAR does mention that the redevelopment could provide opportunities for green infrastructure. The city is strongly encouraged to require that the development incorporate these practices and consider incorporation of bioinfiltration areas where soils allow and tree trenches, pervious pavements, green roofs, etc., into the development. Use of these practices, not only meet permit requirements, but can also serve to address climate resiliency discussed in the AUAR Update. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.

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 AUAR Update, please contact me by email at Karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,

Karen Kromar

This document has been electronically signed.

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

KK:rs

cc: Dan Card, MPCA, St. Paul
Bill Wilde, MPCA, St. Paul
Roberta Getman, MPCA, Rochester



March 29, 2022

Julie Farnham, Senior Planner
City of Bloomington
1800 West Old Shakopee Road
Bloomington, MN 55431

RE: City of Bloomington – South Loop District Alternative Urban Areawide Review (AUAR) Update
Metropolitan Council Review File No. 18655-6
Metropolitan Council District No. 5

Dear Julie Farnham,

Metropolitan Council received the South Loop District AUAR (AUAR) Update on March 15, 2022. The AUAR Update is the 5-year update required under environmental rules. The Council reviewed a previous AUAR Update on April 19, 2017. The AUAR Study Area encompasses 2,350-acres in the northeast corner of the Bloomington. The AUAR Update analyzes the potential impacts of high-intensity, mixed use development including an updated long-term development scenario.

Metropolitan Council staff reviewed the South Loop District AUAR Update to determine its adequacy and accuracy in addressing regional concerns. The staff review concluded that the AUAR Update does not provide adequate information to address our concerns and needs regarding planning for regional wastewater capacity. Council staff also provide additional comments for your consideration:

Section 12. Water Resources / Appendix H. Section 2.0. Sanitary Sewer
(Roger Janzig, roger.janzig@metc.state.mn.us)

The AUAR Update includes development scenarios that may have potential impacts on the capacity of the **regional** wastewater system, specifically the Metropolitan Council Environmental Services (MCES) Interceptor located at the intersection of East 90th Street and 18th Avenue South. *Table 6.5 – Proposed Future Sanitary Sewer Projects* in the Mitigation Plan proposes an increase in the size of the existing regional wastewater interceptor sewer from a 40-inch pipe to a 48-inch pipe (CIP Item #10). Please note that Council records indicate that the size of the existing interceptor is a 42-inch pipe. Council staff recommend that the City update their records to be consistent with the MCES inventory. Please also note that MCES requires further information and discussion about this conclusion, as the Metropolitan Council makes this determination for purposes of capital improvement planning.

The need for wastewater capacity improvements is associated with accommodating a scenario with an additional 3,945 residential units in the Study Area. *Table 6.2 – Existing Land Uses and Updated Development Scenario Forecast* identifies eleven development sites throughout the Study Area. There are development scenarios for four sites in the 2022 Future Build Scenario (2045 “full build”) that include new or additional residential units than previously analyzed: Apple Tree (832 units), Embassy/Park n Fly (548 units), Park n Go (581 units), and Bloomington Central Station (1,984 units).

Council staff strongly encourage that City staff coordinate with MCES Wastewater Planning and Community Program Manager, Kyle Colvin (kyle.colvin@metc.state.mn.us), to determine the nature, likelihood, and extent of long-term wastewater capacity needs.

Section 10. Land Use (*Jerome Benner, 651-602-1494; Todd Graham, 651-602-1322*)

Council staff note that if 90% of the development identified in Table 6.2 is absorbed into the market by 2040, it would add approximately 7,000 jobs, 2,000 households, and 4,000 population to the Study Area.

The development scenario in the AUAR Update contrasts with City’s 2040 comprehensive plan allocation of forecasts for its Transportation Analysis Zones (TAZs). The Study Area is encompassed by Metropolitan Council TAZs #1526-1531. These six TAZs are currently forecasted to gain 11,000 jobs, 1,530 households and 2,650 population from 2014 to 2040.

The City acknowledges that future amendments to the City’s Plan may be required to accommodate the development scenario. Council and City staff may wish to consider higher household and population forecasts and a lower employment forecast for these TAZs. This can be accomplished during a future comprehensive plan amendment. City staff are welcome to contact Metropolitan Council Research to discuss in greater detail.

Section 20. Transportation (Russ Owen, 651-602-1724)

The AUAR Update, on page 65, identifies roadway improvements to address traffic operational issues under year 2040 conditions. These include a proposed I-494/Thunderbird Road Eastbound Ramp. This would mitigate forecasted Level of Service (LOS) F at Lindau Lane/Ikea Way, Lindau Lane/22nd Avenue and the 494/24th Avenue interchange. Please continue to work with MnDOT to understand the engineering feasibility of this proposed improvements well as its consistency with criteria for highway interchanges in the 2040 Transportation Policy Plan (Appendix F). Requests for interchange modifications require review by the joint MnDOT/Metropolitan Council Interchange Planning Review committee. An Interstate Access Request to the Federal Highway Administration (FHWA) may also be required.

Section 20. Transportation (John Dillery, Metro Transit, 612-349-7773)

The AUAR Update details improvements to address traffic operational issues under year 2040 conditions. The AUAR Update recommends the following improvements should LRT service increase in frequency over current conditions:

- American Blvd & 34th Avenue: Grade separation options should be considered.

- East Old Shakopee Rd & 24th Avenue: Grade separation options should be considered.

As the City is aware, the performance of these intersections on the METRO Blue Line are being studied as part of the Riverview Corridor study. There may be new opportunities to positively resolve the traffic issues that are identified in the AUAR Update.

If you have any questions regarding the review please contact Jerome Benner II, Principal Reviewer, at 651-602-1494 or via email at Jerome.Benner@metc.state.mn.us. As always, you can also contact your Sector Representative, Michael Larson, at 651-602-1407 or via email at Michael.Larson@metc.state.mn.us.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT Metro
Molly Cummings, Metropolitan Council District No. 5
Michael Larson, Sector Representative
Jerome Benner II, Principal Reviewer
Reviews Coordinator

N:\CommDev\LPA\Communities\Bloomington\Letters\Bloomington 2022 South Loop District AUAR Update 18655-6.doc

From: [Jason D Gottfried](#)
To: [Farnham, Julie](#)
Cc: [Ashley Morello](#); [KC Atkins](#)
Subject: South Loop District AUAR (update) - HC staff comments
Date: Tuesday, March 29, 2022 4:19:40 PM

Hello Julie,

Please consider the following summary of Hennepin County staff comments on the South Loop District AUAR (Update) document posted in the March 15th EQB Monitor. Our comments almost exclusively were focused on the **Infrastructure Improvement Study (Appendix F)**

General Comments

- Few concepts/modifications prioritize people walking, rolling and biking. Suggest prioritization of mode shift and pedestrian connectivity in the area vs just existing usage, especially considering 4 LRT stations in proximity. Many of the proposed changes prioritize vehicular expediency and fail to promote alternative modes. Further analysis is needed to determine the preferred locations for bike facilities (especially regional trail(s)) with consideration for destinations, network connections and conflict reduction.
- Generally, no concerns raised from a traffic operations standpoint. We support the utilization of VISSIM software in modelling.
- What growth rate(s) were used in the 2040 Conditions?
- What is being done as far as adding park/green space to the District either thru redevelopment, preservation, or intentional conversion of surface parking?
- We support greater efforts of intentional connectivity and wayfinding between the South Loop District and the natural amenities of the MN Valley National Wildlife Refuge
- Sidewalks and trails should have significant boulevard separation from roadways. When modifying roadway geometry, maintain most direct walkway/paths (avoid meandering)
- General support of free-right turn lane removal where turning radii allows. Enhance parkchops for greater pedestrian comfort where not feasible

Pg 17 – TH 77 / E Old Shakopee Rd interchange

- General support to further study removal of Glenview Ln access and continuous movement intersection

Pg 18, 23 - Priority 1 Improvement (I-494/24th Ave)

- Triple WB left-turn lanes and dual EB right-turn lanes proposed would seem to promote high speeds and weaving and further discourage pedestrian and bike crossings
- Please clarify - Is this diverging diamond interchange really the preferred location for a regional trail crossing over I-494?
- How are u-turns from WB ramp addressed?
- Consider passive detection for people walking and biking on the east-side of 24th Ave (County Road 1) through the EB on-ramp to I-494

Pg 23 to 25 Priority 7 Improvement (24th Ave – I-494 to Killebrew Dr/E Old Shakopee Rd)

- Enhanced bikeway along east-side of 24th St may be desirous. While not currently on the

county bike plan, we are open to further study. Off-road trail will need wide boulevard separation and need to minimize vehicular access/conflict points along 24th

Pg 24 - 24th Avenue at 79th Street

- We recommend consideration of removal of this signalized intersection, ideally before development so as to not be assumed in retention
- Regardless of future of signal, SB left-turn lane should be removed. Only used for unwelcomed u-turns

Pg 24 - 24th Avenue at Lindau Lane

- Are two existing WB receiving lanes along Lindau Ln needed with only one WB approaching lane? Could widen N-S pedestrian crossing refuge with this space
- In the southeast quadrant if free-right cannot be removed, bikes and peds should both cross free-right perpendicular at same location along pedestrian ramps

Pg 24 - 24th Avenue at Killebrew Dr/Old Shakopee

- Support removal of free-right in NE quad and SE if feasible. Need for 'No turn on red' to avoid LRT crossing conflicts

Pg 70 - Access

- Avoid new RIRO access south of 82nd. Development site should guide all vehicle access to 82nd Ave to reduce ped/LRT crossing conflicts
- Development south of 82nd Ave should heavily promote transit and LRT connections and minimize crossing conflicts of trail and tracks

Pg 73 - Nine Mile Creek Regional Trail

- Align E-W regional trail with any grade-separated crossing of 24th Ave

Pg 107 – Old Shakopee Rd Sidewalk Gap

- County staff welcome coordination with City staff on further coordination to eliminate sidewalk gaps

Pg 116 – Thunderbird Rd / I-494 EB ramp

- We support further study with MnDOT of this feasibility. While we recognize benefits to American Blvd and 24th Ave, there are significant concerns with merge/converge points along the ramp(s)

Kelley Farm Site

The Minnesota River Valley is one of Hennepin County's iconic natural resources, and Ike's Creek in particular is the only place in Hennepin County that sustains a self-propagating brown trout population. While we understand the potential of this property to contribute to the tax-base and density in this area (and the value of both of those things), in this case we encourage the City of Bloomington to consider setting aside some additional parts of the Kelley Farm parcel (beyond the bluff overlay district) as planned conservation or park space to help protect Ike's Creek and the

Minnesota River bluffs. These natural resources are singular and irreplaceable for the citizens of Hennepin County. They are threatened already by climate change and bluff top development will add to stressors. Note that the Hennepin County Landslide Interactive Map identifies at least three known landslides along the bluffs just north and south of this AUAR study area and around 30 data signatures indicating smaller undated landslide activity in blufflands adjacent to the Kelley Farm and Forest Glen Apartments. Hennepin County would be a willing and eager partner in any effort to increase conservation areas at the bluff top beyond the bluff overlay district.

I can provide a more formal comment letter if needed, just wanted to be sure to meet the deadline for submittal

Be well

Jason

Jason Gottfried

Transportation Planner
Transportation Planning

Office: 612-596-0394 Cell: 612-719-8073

jason.gottfried@hennepin.us

Hennepin County Public Works

1600 Prairie Drive

Medina, MN 55340

(working remotely)

Disclaimer: If you are not the intended recipient of this message, please immediately notify the sender of the transmission error and then promptly permanently delete this message from your computer system.



Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

March 31, 2022

Julie Farnham, Senior Planner
City of Bloomington
1800 West Old Shakopee Rd.
Bloomington, MN 55431

Dear Julie Farnham,

Thank you for the opportunity to review the South Loop District AUAR 2022 Update regarding future development in Hennepin County. The Minnesota Department and Natural Resources (DNR) respectfully submits the following comments for your consideration:

1. Page 14, Section 7, Climate Adaptation and Resilience. The DNR appreciates that the City of Bloomington has incorporated climate trend analysis into this environmental review document.
2. Page 28, Geology. Please note that karst features have been identified within the Forest Glen Park Area in the vicinity of Ike's Creek. This area has been designated by the watershed district as a High Value Resource Area, and is also mapped as a Minnesota Biological Survey Site of Moderate Biodiversity Significance and a DNR Natural Plant Community (NPC) MHs37b - Red Oak - White Oak - (Sugar Maple) Forest. It is extremely important that effective stormwater management is used in this area to prevent groundwater contamination and protect this valuable natural resource.
3. Page 39, Stormwater. The DNR recommends that the City of Bloomington consider using water from the stormwater ponds (where infiltration is not feasible) for irrigating landscaping, as is commonly done in the Cities of Medina and Hugo.
4. Page 39, Stormwater. Because the stormwater from the project area ultimately ends up in the ecologically sensitive, Long Meadow Lake, it is important to note that the planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this [website](#). Many winter maintenance staff who have attended the Smart Salting

training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

We also encourage cities and counties to provide public outreach to reduce the overuse of chloride. Here are some [educational resources](#) for residents as well as a [sample ordinance](#) regarding chloride use.

5. Page 39, Stormwater. We recommend using BWSR-approved, weed-free, native [seed mixes](#) to the greatest degree possible in stormwater features, parkland, and landscaping in order to provide habitat for the federally endangered rusty patched bumblebee and other pollinators. The Board of Water and Soil Resources' Lawns to Legumes [website](#) has many excellent resources related to selecting seed mixes and establishing pollinator habitat. Please also see this statewide [Pollinator Plan](#) and consider how the City of Bloomington can incorporate pollinator-friendly practices and ordinances into local projects. Stormwater features in particular provide an excellent opportunity to replace standard turf with a diverse plant mix that provides greater wildlife and water quality benefits.
6. Page 46, Section 14, Rare Features. Please see the attached Natural Heritage Letter dated March 30, 2022 regarding potential impacts to state-listed species.
7. Page 48, Section 14, Rare Features. Please note that this section should discuss the state-listed species identified within the project area and how impacts to these species will be avoided. The majority of state-listed species are associated with the Minnesota River Valley National Wildlife Refuge and adjacent bluff area. The AUAR has previously discussed the Bluff Protection Overlay District, which provides building setbacks, stormwater requirements, and vegetation protection for the bluff area, which could also limit impact to wildlife. Some additional avoidance measures include:
 - Due to the presence of state-listed bats, please limit tree and shrub removal in June and July during the pup-rearing season.
 - Peregrine Falcons (state-listed species of special concern) have been documented nesting on buildings in the project area in the past, though we are not aware of any current populations. If any nests are observed during building demolition, please contact the DNR.
 - Due to the presence of state-listed species within the project area, please limit erosion control blankets to natural netting materials, and specifically do not use products that contain plastic.
 - As much as possible, incorporate native planting and seed mixes into stormwater features and development landscaping.
 - Inspect and clean equipment to prevent the spread of invasive species. Also, specifically use seed mixes and materials that are weed-free.

Please note that the project area is also within the Audubon's [Lower Minnesota River Valley Important Bird Area](#). Some strategies to reduce impact on bird species are to install bird diverters on electrical lines within the vicinity of the bluff. Lighting for any development along the bluff area will be important due to the proximity to the Minnesota River Valley National Wildlife Refuge and the many state-listed rare bird, bat, and insect species documented in the vicinity that can be especially sensitive to light. Should these developments propose to use LED

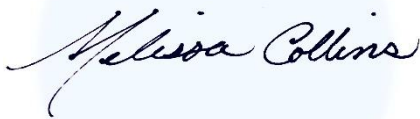
luminaries, we recommend following the MnDOT Approved Products for luminaries, which limit the uplight rating to 0, and the maximum nominal color temperature to 4000K. These criteria meet known concerns for temperature and uplighting.

Also, note that the USFWS has provided guidance in regards to lighting and preventing adverse impacts to the Northern Long Eared Bat. Their guidance in part says that for the Backlight, Uplight, Glare (BUG) rating system developed by the Illuminating Engineering Society, the goal is to be as close to 0 for all three ratings with a priority of "uplight" of 0 and "backlight" as low as practicable. To meet these criteria, please choose products that have the lowest number for backlight and glare (all approved products should already be 0 for Uplight).

We also recommend that all non-essential lighting should be able to be turned off during the Mayfly hatch and also follow the Audubon 'lights out' program. This a program that darkens all buildings and structures during the bird migration from midnight to dawn March 15 - May 31 and August 15 - Oct 31. Information on this program is here:
<http://mn.audubon.org/conservation/lights-out-faq>.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Melissa Collins". The signature is written in a cursive style and is set against a light blue rectangular background.

Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5755
Email: melissa.collins@state.mn.us

Equal Opportunity Employer

April 6, 2022

Julie Farnham
Senior Planner
City of Bloomington
1800 West Old Shakopee Road
Bloomington, MN 55431,

SUBJECT: MnDOT Review #AUAR22-006
South Loop District AUAR
SE Quad I-494 and MN77, bounded by Minnesota River on SE side
Bloomington, Hennepin County

Dear Ms. Farnham:

Thank you for the opportunity to review the plans for the **South Loop District AUAR**. Due to the concept level nature of an AUAR the information determined in the traffic impact study can only be considered as a general indication of environmental impact. The development scenarios many times change after the AUAR is completed, therefore rendering the traffic analysis incomplete. Review of the AUAR does not constitute approval of a regional analysis and is not a specific approval for access or new roadway improvements.

When the detailed site plans are developed the traffic analysis should reflect the proposed development. Our agency would request the opportunity to review any updated information, as well as meet with the city and developer to discuss traffic issues.

Any intersection development of the magnitude indicated in the AUAR will need to be reviewed through the Level 2 Layout review process. The MnDOT Metro Area Engineer, Aaron Tag (aaron.tag@state.mn.us or 651-234-7880) will be able to guide you through the layout review process.

The following website provides layout design guidance and identifies layout requirements: <http://www.dot.state.mn.us/design/geometric/index.html>. The first link under Guidance is helpful, as well as the Design Resources tab.

MnDOT has reviewed the documents and has the following comments:

Right of Way:

Please be aware that there are Mill and Overlay projects scheduled on both MN 77 between I-494 and the Minnesota River (scheduled for Fiscal Year 2022) and on I-494 between MN 77 and the Minnesota River in the upcoming year (FY 2023) - as well as some work on the wetlands.

An equal opportunity employer

Please direct questions concerning these comments to Doug Nelson, MnDOT Right of Way Area Manager at douglas.nelson@state.mn.us or telephone: 651-234-7583.

Traffic:

The interim connections at Thunderbird Road to/from MN77 & I-494 Collector Distributor may constitute a change in access to the Interstate system, and would be subject to applicable rules and regulations.

Questions on these comments should be directed to Eric Lauer-Hunt, MnDOT Metro West Area Traffic, eric.lauer-hunt@state.mn.us or telephone: 651-234-7875.

Pedestrian/Bicycle:

Table 6.3 in the AUAR details planned roadway improvements. In the table, line-item SL-16-006 mentions the construction of dual northbound right turn lanes onto eastbound I-494 ramps and signal timing improvements and possible ramp signalization. MnDOT would highly recommend that a Rectangular Rapid-Flashing Beacon (RRFB) be added to the dual right turn lane. Dual right turn lanes here can negatively affect pedestrian safety at the crossing. In regards to line-item SL-16-007-which also mentions dual right turn lanes and ramp signalization- MnDOT would highly recommend that, due to the centerline merge on the ramp, dual right turn lanes not be constructed unless the ramp is signalized with clear “no turn on red” signage. MnDOT supports the free-right removals mentioned in line items SL-16-005, and SL-16-007.

MnDOT recommends coordination with Metro District Multimodal planning during the development of layouts for these projects.

Questions regarding these comments should be directed to Jesse Thorsen, MnDOT Metro Multimodal at Jesse.Thorsen@state.mn.us or 651-234-7788

Water Resources:

Any redevelopment or projects adjacent to MnDOT Right-of-Way or connecting to MnDOT drainage facilities will require a MnDOT drainage permit to ensure that current drainage rates to MnDOT right-of-way will not be increased. The drainage permit application, including the information below, should be submitted online to: <https://dotapp7.dot.state.mn.us/OLPA/>
The following information must be submitted with the drainage permit application:

- 1) A grading plan showing existing and proposed contours.
- 2) Drainage area maps for the proposed project showing existing and proposed drainage areas. Any off-site areas that drain to the project area should also be included in the drainage area maps. The direction of flow for each drainage area must be indicated by arrows.
- 3) Drainage computations for pre and post construction conditions during the 2, 10, 50 and 100 year rain events.
- 4) Time of concentration calculations.
- 5) An electronic copy of any computer modeling used for the drainage computations.
- 6) See also the attached Drainage Permits Checklist for more information.

Once a drainage permit application is submitted, a thorough review will be completed and additional information may be requested.

Please direct questions concerning drainage issues to Jason Swenson (651-234-7539) or Jason.Swenson@state.mn.us of MnDOT's Water Resources section.

Permits:

In addition to the Drainage permits mentioned above, any use of, or work within or affecting, MnDOT right of way will require a permit.

Permits can be applied for at this site: <https://olpa.dot.state.mn.us/OLPA/>. Please upload a copy of this letter when applying for any permits.

Please direct questions regarding permit requirements to Buck Craig of MnDOT's Metro Permits Section at 651-775-0405 or Buck.Craig@state.mn.us.

Review Submittal Options

MnDOT's goal is to complete reviews within 30 calendar days. Review materials received electronically can be processed more rapidly. Do not submit files via a cloud service or SharePoint link. In order of preference, review materials may be submitted as:

1. Email documents and plans in PDF format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. Documents can be zipped as well. If multiple emails are necessary, number each message.
2. PDF file(s) uploaded to MnDOT's external shared internet workspace site at: <https://mft.dot.state.mn.us/metrodevreviews.dot@state.mn.us>. Contact MnDOT Planning development review staff at for uploading instructions, and send an email listing the file name(s) after the document(s) has/have been uploaded.

If you have any questions concerning this review, please contact me at (651) 234-7797.

Sincerely,



Cameron Muhic
Senior Planner

Copy sent via E-Mail:

Buck Craig, Permits
Jason Swenson, Water Resources
Aaron Tag, Area Engineer
Michael Samuelson, Multimodal
Russell Owen, Metropolitan Council

Lance Schowalter, Design
Eric Lauer-Hunt, Traffic
Doug Nelson, Right-of-Way
Jesse Thorsen, Multimodal