

South Loop Alternative Urban Areawide Review (AUAR) Update Report – 2012 / Addendum

Response to Comments

On May 10, 2012 the City distributed the South Loop District AUAR Update Report (May 2012) to the official distribution list as required by State Statutes (Sec. 4410.3610). During the 30-day comment period, the City received comments from three agencies on the South Loop District AUAR Update Report. Responses to comments are summarized below.

Minnesota Pollution Control Agency, Karen Kromar, May 25, 2012

The Minnesota Pollution Control Agency's comment letter focused on Section 11 – Fish, Wildlife and Ecologically Sensitive Resources and Section 12 – Physical Impacts on Water Resources.

Section 11 – Fish, Wildlife and Ecologically Sensitive Resources

Comment: The MPCA letter inquired about the status of the stream as a designated trout stream and corresponding permit requirements for designated special waters.

Response: At this time, the stream is not a designated trout stream. The City requires that all projects disturbing one acre or more of ground must obtain an NPDES Construction Site Permit prior to being issued local construction permits. This includes a provision requiring submittal of a project Storm Water Pollution Prevention Plan (SWPPP). The City reviews the applicant's submittals for accuracy and adequacy in meeting permit requirements, but does not implement or enforce the Agency's permit.

Section 12 – Physical Impacts on Water Resources

Comment: The MPCA letter noted that the Minnesota River is listed on its Inventory of Impaired Waters, noting that the impairment will dictate additional increased stormwater treatment. The MPCA requested that the Project proposer determine that compliance with the increased stormwater water quality treatments can be achieved.

Response: The City is aware of the MPCA inventory of Impaired Waters mapping tool and listing of the Minnesota River. Since the 2002 AUAR was approved, the City has adopted numerous stormwater-related requirements for new development and redevelopment designed to reduce pollutant loading to receiving water bodies and enhance water quality. These requirements are found in the City's 2007 Comprehensive Surface Water Management Plan and current Storm Water Pollution Prevention Program (SWPPP) as part of the City's MS4 stormwater permit coverage.

As stated above, applicants disturbing one acre or more of ground must obtain coverage under the NPDES Construction Site Permit and provide the site SWPPP as a condition of local approval. The Construction Site Permit/SWPPP is prepared by a project proposer and the information is reviewed for accuracy by the City's Engineering Department.

Metropolitan Council, Phyllis Hanson, June 13, 2012

The Metropolitan Council's comment letter found the document complete and accurate but offered several comments.

Section 6 – Description and Section 18 – Water Quality – Sanitary Wastewater: Comments were informational in nature.

Response: Acknowledge comments.

Section 21 – Traffic: Comments related to projects listed in Tables 2 and 2A.

Comment: Note that Projects 7, 8, and 15 will improve operating speed of Route 54.

Response: Acknowledge and agree with comment.

Comment: Note that Projects 12 and 13 may affect bus stop and waiting shelter locations.

Response: The City is supportive of transportation network improvements that facilitate transit use and will continue to work with Metro Transit to coordinate City projects such as 12 and 13 with existing or planned bus stop and shelter locations.

Comment: Note that Projects 17 and 18 improve safety and transit access. Inquired about possibility that a new transit stop could be incorporated into the grade-separated section of Lindau Lane.

Response: The City shares the interest in facilitating efficient transit services and operations in the South Loop district. While the City and Metro Transit have discussed the idea of incorporating a new transit stop into the grade separation project, there are several reasons the City is not implementing it. The heavy eastbound right-turn lane use/right-turn volumes circulating the Mall of America on the north side today are anticipated to increase with Mall of America's proposed removal of the north internal ring road with future development in that area. Combining the heavy right-lane use with a transit stop at this location poses concerns related to functionality, cost, and safety. There would be significant additional cost if the City were to try to accommodate both as it would require a wider structure and additional right-of-way acquisition. There are also homeland security issues to consider. One of the easiest ways to mitigate this type of security concern is to prohibit stopping beneath the structure, but installation of a transit stop would preclude the ability to limit stopping beneath the structure.

Comment: Note that Projects 19 and 20 could trigger re-alignment of Route 54.

Response: The City has been working closely with Metro Transit in developing the South Loop District Plan and Lindau Link concept and impacts on current and future transit routes. The City looks forward to continuing to coordinate with Metro Transit on the surface park & ride lot modifications and the proposed City improvements in the area.

Section 25 – Nearby Resources – Designated Parks, Recreation Areas, or Trails:

Comment: The Metropolitan Council staff recommended that the AUAR Update acknowledge the planned Nine Mile Creek Regional Trail.

Response: The AUAR will acknowledge the planned Nine Mile Creek Regional Trail that will utilize the existing infrastructure built along American Boulevard through the South Loop district.

Minnesota Department of Transportation, Molly McCartney, June 4, 2012

The letter from MnDOT did not provide further comments but noted comments previously submitted on the original AUAR (2002) and the last update (2009).

Response: Acknowledge comments.