



MINNESOTA MULTI-PURPOSE STADIUM



MINNESOTA MULTI-PURPOSE STADIUM FINDINGS OF FACT, CONCLUSIONS, AND ORDER

AUGUST 2013





MINNESOTA SPORTS FACILITIES AUTHORITY

ADEQUACY DETERMINATION

In the Matter of the Final Environmental Impact Statement for the Minnesota Multi-Purpose Stadium, Minneapolis, Minnesota

FINDINGS OF FACT, CONCLUSIONS, AND ORDER

The above-titled matter came before the Minnesota Sports Facilities Authority (MSFA), the Responsible Governmental Unit (RGU) for the proposed Minnesota Multi-Purpose Stadium, upon completion of a Final Environmental Impact Statement for the Proposed Project. Based upon, and after having considered, the entire record of the proceeding, including written reports, written and oral data, information, statements, and the MSFA's files and records related to this matter, the MSFA hereby finds, concludes, and orders as follows:

FINDINGS OF FACT

1. The MSFA ("Proposer"), in conjunction with the Minnesota Vikings, proposes a multi-purpose Stadium and related stadium infrastructure, including parking facilities and a stadium plaza (collectively, the "Proposed Project"), to be used as a venue for the National Football League (NFL) and a broad range of other civic, community, athletic, educational, cultural, and commercial activities in downtown Minneapolis, Minnesota. The Proposed Project will involve the construction of a new Stadium on the current Hubert H. Humphrey Metrodome (Metrodome) site and will include demolition of the existing Metrodome. The new, approximately 1,730,000 square foot Stadium is proposed to seat approximately 65,500 persons (with expansion to approximately 73,000 seats) and to include suites, club seats, shops, restaurants, an NFL team museum, Hall of Fame, locker and training rooms, and year-round space for Minnesota Vikings administrative operations, ticket sales, and MSFA administrative offices.
2. On May 14, 2012, Governor Dayton signed legislation, now codified at Minn. Stat. ch. 473J, addressing the Proposed Project. The legislation creates the MSFA and states that the MSFA is the RGU for the Proposed Project under the Minnesota Environmental Policy Act (MEPA), Minn. Stat. ch. 116D, and the Minnesota Environmental Quality Board (EQB) rules implementing MEPA, Minn. R. ch. 4410.
3. The Proposed Project meets or exceeds the threshold for a mandatory environmental impact statement (EIS) under Minn. R. 4410.4400, subp. 22.
4. On September 24, 2012, the MSFA completed a Scoping Environmental Assessment Worksheet (EAW) and Draft Scoping Decision Document (SDD) for the Proposed Project, in accordance with Minn. R. 4410.2100.
5. In accordance with Minn. R. 4410.2100, subp. 2, the MSFA published a Notice of Availability of the Scoping EAW and Draft SDD in the *EQB Monitor* (Vol. 36, No. 20) on October 1, 2012. The notice included the time, place, and date of the Scoping meeting. Publication of the notice commenced the 30-day Scoping period, as provided in Minn. R. 4410.2100, subp. 3.
6. The MSFA supplied a press release regarding the Scoping EAW and Draft SDD to at least one newspaper of general circulation in the vicinity of the Proposed Project, as required by Minn. R. 4410.1500. The press release included the name and location of the Proposed Project, a brief description of the Proposed Project, the location at which copies of the Scoping EAW and Draft SDD were available for review, the date the comment period ended, and the procedures for commenting.



7. The MSFA provided copies of the Scoping EAW and Draft SDD to all parties designated on the EQB EAW distribution list, in accordance with Minn. R. 4410.1500(A). The MSFA also made the Scoping EAW and Draft SDD available to the public by posting the documents on the MSFA's website and by providing paper copies of the documents to the Hennepin County Public Library.
8. In accordance with Minn. R. 4410.2100, subp 3(B), the MSFA held a public Scoping meeting for the Proposed Project on October 23, 2012, at the Hubert H. Humphrey Metrodome – Halsey Hall Room, 900 South 5th Street, Minneapolis, Minnesota, from 5:00-7:00 pm. Forty individuals signed in at the meeting. The attendees received information on the Proposed Project, as well as materials describing the proposed issues and impacts that the EIS for the Proposed Project would address. In addition, the attendees had the opportunity to ask questions about the Proposed Project and environmental review process. The MSFA provided a comment form for submitting written comments on the proposed EIS scope and also made a court reporter available to record verbal comments.
9. In accordance with Minn. R. 4410.2100, subp. 3, the Scoping public period on the Scoping EAW and Draft SDD began on October 2, 2012, the day following publication of the Notice of Availability of the Scoping EAW and Draft SDD in the *EQB Monitor* (Vol. 36, No. 20) on October 1, 2012. The scoping comment period ended on October 31, 2012. During the 30-day Scoping comment period, the MSFA received public comments on the Scoping EAW and Draft SDD in writing by email and by U.S. Mail. In addition, the MSFA received public comments submitted at the October 23, 2012, public Scoping meeting.
10. The MSFA received 15 comment letters and four transcribed verbal comments on the Scoping EAW and Draft SDD during the 30-day Scoping comment period. Comments were received from:

Minnesota Department of Natural Resources	Claudia Fuglie
Minnesota Department of Transportation	Kathy Gyro
Minnesota Pollution Control Agency	Andrew Hauer
State Historic Preservation Office	Ray Lewis
Metropolitan Council	Steve Pany
City of Minneapolis	Kevin Rush
University of Minnesota	John Schatzlain
Marcy-Holmes Neighborhood Association	Barrett Steenrod
Minneapolis Bicycle Coalition	Anonymous
11. The EQB rules do not require the RGU to respond to comments received on the Scoping EAW and Draft SDD but require the RGU to consider the comments received in developing the final Scoping decision.
12. Comments received during the Scoping period were included, along with a response to each comment, in Appendix C of the Final SDD and, where appropriate, were reflected in the body of the Final SDD.
13. Minn. R. 4410.2100, subp. 3(C), requires the RGU to issue a Final SDD within 15 days after the close of the 30-day Scoping period.
14. On November 16, 2012, after reviewing the technical analysis completed and comments received during the Scoping period, the MSFA passed a Scoping decision resolution.
15. The MSFA revised the Draft SDD in response to comments received on the Scoping EAW and Draft SDD, as warranted. The MSFA issued the Final SDD for the Proposed Project on December 10, 2012.



16. The Final SDD included the content required by Minn. R. 4410.2100, subp. 6. In specific, the Final SDD included the following information: the issues to be addressed in the EIS; the time limits for preparation; identification of the permits for which information will be gathered concurrently with EIS preparation; identification of the permits for which a record of decision will be required; alternatives that will be addressed in the EIS; identification of potential impact areas resulting from the project itself and from related actions which shall be addressed in the EIS; and identification of necessary studies requiring compilation of existing information or the development of new data that can be generated within a reasonable amount of time at a reasonable cost.
17. The MSFA provided copies of the Final SDD to all parties designated on the EQB EAW distribution list, to all parties that submitted comments on the Scoping EAW and Draft SDD, and to all parties requesting copies. The MSFA also made the Final SDD available to the public by posting the documents on the MSFA's website and by providing paper copies of the documents to the Hennepin County Public Library.
18. On December 10, 2012, the MSFA published a Scoping Decision and EIS Preparation Notice summarizing the Final SDD in the *EQB Monitor* (Vol. 36, No. 25). The MSFA supplied a press release to at least one newspaper of general circulation in the vicinity of the Proposed Project, in accordance with Minn. R. 4410.2100, subp. 9.
19. In accordance with Minn. R. 4410.2300, the MSFA, with assistance of a consultant, prepared the Draft EIS for the Proposed Project. The Draft EIS included the content required by Minn. R. 4410.2300. In specific, the Draft EIS included the following information: cover sheet; signature page; table of contents; list of tables; list of figures; executive summary; list of preparers; glossary; purpose and need; project alternatives; affected environment, environmental consequences, and proposed mitigation measures; public involvement; permits and approvals; and appendices.
20. The Draft EIS evaluates and analyzes effects and alternatives commensurate with their importance as identified by the Scoping process and identifies reasonable mitigation measures for identified adverse effects.
21. In accordance with Minn. R. 4410.2400, the MSFA incorporated material into the Draft EIS by reference to reduce the bulk of the document without impeding governmental and public review of the project. All material incorporated by reference was made available for inspection by interested persons within the time allowed for comment.
22. According to Minn. R. 4410.2600, subp. 3, the MSFA distributed copies of the Draft EIS to all parties designated on the EQB EIS distribution list, government units with authority to permit or approve the Proposed Project, the Proposer, all parties that submitted comments during the Scoping process, and all individuals requesting a copy. The MSFA also made the Draft EIS available to the public by posting the document on the MSFA's website and by providing paper copies of the document to the Hennepin County Public Library.
23. In accordance with Minn. R. 4410.2600, subp. 5, the MSFA published a Notice of Availability of the Draft EIS in the April 29, 2013, *EQB Monitor* (Vol. 37, No. 9). The notice included the date, time, and location of the public informational meeting, notice of where copies of the Draft EIS were available for public review, and indicated the comment period closure date (June 6, 2013).
24. In accordance with Minn. R. 4410.2600, subp. 8, the MSFA held a public informational meeting on the Proposed Project on May 22, 2013, at the Hubert H. Humphrey Metrodome – Vikings Lounge, Minneapolis, Minnesota, from 5:00 to 7:00 pm, not less than 15 days after publication of the notice of Draft EIS availability in the *EQB Monitor*. Materials shown at the public informational meeting were made available on the MSFA's website.



25. The MSFA received 19 written comments and one transcribed verbal comment on the Draft EIS during the comment period. Comments were received from:

Minnesota Department of Health	Phillip Koski
Minnesota Department of Natural Resources	Willard Shapira
Minnesota Department of Transportation	Brad Worcester
Minnesota Pollution Control Agency	Alex Adams
State Historic Preservation Office	Debra Adams
Metropolitan Council	Suzanne Begin
Hennepin County	Claudia Fuglie
City of Minneapolis	Kathy Gyro
Tom Becker	Jordan Moulton
James Glockner	Anonymous

26. According to Minn. R. 4410.2600, subp. 10, the RGU is required to prepare a Final EIS that responds to timely substantive comments on the Draft EIS, is consistent with the Final SDD, and must include any necessary revisions to the Draft EIS.

27. The MSFA prepared written responses to comments made at the public informational meeting and to substantive comment letters consistent with the Final SDD received during the public comment period. Comment letters and responses are presented in Chapter 6 of the Final EIS.

28. The MSFA prepared a Final EIS that incorporates changes and revisions in response to comments on the Draft EIS and reflects updated design information for the Proposed Project. In addition, the MSFA included in the Final EIS as Appendix B a document entitled *Minnesota Multi-Purpose Stadium Traffic Technical Memorandum* (Kimley-Horn, July 2013).

29. The Final EIS comprises the complete EIS for the Proposed Project.

30. In accordance with Minn. R. 4410.2700, subp. 3, the MSFA distributed the Final EIS to all parties that received a copy of the Draft EIS, to all parties that submitted comments on the Draft EIS, and to all parties requesting a copy. The Final EIS was also made available to the public by posting the document on the MSFA's website and by providing paper copies of the document to the Hennepin County Public Library.

31. In accordance with Minn. R. 4410.2700, subp. 4, the MSFA published a notice of Final EIS availability in the *EQB Monitor* (Vol. 37, No. 16) on August 5, 2013. The notice included the location of copies of the Final EIS available for review and described the opportunity for public comment on the adequacy of the Final EIS.

32. In accordance with Minn. R. 4410.2800, the MSFA accepted comments on the adequacy of the Final EIS through August 19, 2013, not less than 10 days following publication in the *EQB Monitor*.

33. The MSFA considered the comments received during the Final EIS comment period when determining Final EIS adequacy.

34. The MSFA received four comment letters during the Final EIS comment period.

35. The letters and the MSFA's responses to the specific comments on the Final EIS are attached and incorporated as Exhibit A to this Adequacy Determination.

Following is a summary of the topics included in the comment letters:

- Groundwater
- Wastewater



- Stormwater
 - Bird impacts
 - Traffic
 - Pedestrian access/ facilities
 - Light rail transit (LRT) station platform
36. Following is a list of those who commented on the Final EIS on or before August 19, 2013:
- a. Minnesota Department of Natural Resources
 - b. Minnesota Pollution Control Agency
 - c. Metropolitan Council
 - d. City of Minneapolis
37. The MSFA received a comment letter from Hennepin County through email on August 22, 2013.
38. The letters from Findings of Fact 36a, 36b, 36c, and 36d specifically address EIS adequacy as defined by Minn. R.4410.2800, subp 4.
39. Comments received after the close of the Final EIS public comment period do not bear on the EIS adequacy decision. Upon request, the MSFA will provide copies of any letters received after the close of the comment period to all permitting agencies for consideration in project decision-making.
40. Minn. R. 4410.2800, subp. 1, requires the RGU to determine adequacy of the Final EIS unless notified by the EQB that the EQB will make the determination. If the EQB decides to make the adequacy determination, it must notify the RGU of its decision no later than 60 days following publication of the preparation notice in the *EQB Monitor*. The EQB has not given such notification to the MSFA.
41. Minn. R. 4410.2800, subp. 4, requires the RGU to find the Final EIS adequate if it:
- a) addresses the potentially significant issues and alternatives raised in Scoping so that all significant issues for which information can reasonably be obtained have been analyzed; b) provides responses to the substantive comments received during the Draft EIS review concerning issues raised in Scoping; and c) was prepared in compliance with the procedures of the Minnesota Environmental Policy Act (Minnesota Statutes, chapter 116D.04) and the Environmental Quality Board Review Program Rules (Minnesota Rules, parts 4410.0200 to 4410.6500).

CONCLUSIONS

1. The MSFA is charged with determining the adequacy of the EIS for the Minnesota Multi-Purpose Stadium in Minneapolis, Minnesota.
2. The EIS meets the content requirements of Minn. R. 4410.2300.
3. The MSFA prepared the EIS in compliance with the procedures of MEPA, Minn. Stat. ch. 116D, and Minnesota R. ch. 4410.
4. The public has been afforded opportunities for input to the scope of the EIS, the content of the Draft EIS and Final EIS, and the adequacy of the Final EIS, in accordance with MEPA, Minn. Stat. ch. 116D, and the rules implementing MEPA, Minn. R. ch. 4410.



5. The information presented in the Final EIS adequately addresses the issues identified in the Final SDD.
6. The Proposed Project is described in sufficient detail.
7. The EIS adequately analyzes significant environmental impacts.
8. The EIS adequately presents alternatives to the proposed action and their impacts.
9. The EIS adequately presents methods by which adverse environmental impacts can be mitigated.
10. The EIS adequately presents the economic, employment, and sociological effects that cannot be avoided should the proposed action be implemented.
11. The EIS is adequate because it meets the criteria set forth in Minn. R. 4410.2800, subp. 4, which requires that the EIS:
 - a. address the potentially significant issues and alternatives raised in Scoping so that all significant issues for which information can be reasonably obtained have been analyzed;
 - b. provides responses to the substantive comments received during the Draft EIS review concerning issues raised in Scoping; and
 - c. was prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minn. R. 4410.0200 to 4410.6500.
12. Any finding more properly considered a conclusion shall be considered a conclusion. Any conclusion more properly considered a finding shall be considered a finding.

ORDER

Based on the above findings of fact and conclusions, and the entire administrative record of the proceedings, the Minnesota Sports Facilities Authority (MSFA) hereby determines that the Final Environmental Impact Statement for the proposed Minnesota Multi-Purpose Stadium in Minneapolis, Minnesota, is adequate under the Minnesota Environmental Policy Act (Minn. Stat. ch. 116D) and the EQB rules implementing MEPA (Minn. R. ch 4410).

Approved and adopted this 23 day of August 2013.

MINNESOTA SPORTS FACILITIES AUTHORITY

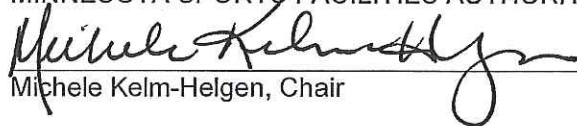

Michele Kelm-Helgen, Chair



Exhibit A

Response to Comments on the Final EIS



Response to Comments on the Final EIS

1.1 Opportunities for Public Comment and Guidelines for Responding to Comments

A notice of availability of the Final EIS was published in the *EQB Monitor* on August 5, 2013, and in local media sources. The document was distributed to agencies and organizations on the official EQB distribution list, additional agencies and organizations that had requested a copy of the document, and agencies, organizations, and individuals who had commented on the Draft EIS or the Scoping Environmental Assessment Worksheet (EAW)/Draft Scoping Decision Document (SDD). It was also posted on the MSFA website (www.msfa.com).

The comment period extended from August 5-19, 2013. Comments were received in writing by email or US mail. A total of four comment letters were received, all from government agencies by the close of the comment period on August 19, 2013. On August 22, 2013, the MSFA received a comment letter (submitted by email) from Hennepin County. Consistent with state environmental review rules, the written responses to all substantive comments are included as part of this adequacy determination. Written responses have been provided for all comments pertaining to the environmental analysis conducted for and documented in the Final EIS. A copy of each comment letter followed by responses to comments is included in Section 1.2.

1.2 Comments and Responses

Comment letters were received from the following governmental agencies during the comment period:

- Minnesota Department of Natural Resources
- Minnesota Pollution Control Agency
- Metropolitan Council
- City of Minneapolis

A comment letter was received from Hennepin County after the close of the comment period (August 22, 2013, submitted by email). Responses to Hennepin County's comments are included in this document.

The remainder of this section presents each comment letter with each comment for which a response has been prepared highlighted and numbered. The response to each numbered comment is included on the page following the comment.



1.2.1 Minnesota Department of Natural Resources

From: Doperalski, Melissa (DNR) [<mailto:melissa.doperalski@state.mn.us>]
Sent: Friday, August 16, 2013 7:34 AM
To: Steve Maki
Cc: jeckles@audubon.org
Subject: Re: Minnesota Multi-Purpose Stadium FEIS - DNR Comments

Mr. Maki,

The Department of Natural Resources (DNR) has reviewed the Final Environmental Impact Statement (FEIS) as it relates to previous environmental review comments the DNR has provided for the proposed Minnesota Multi-Purpose Stadium located in Minneapolis, Hennepin County.

DNR Comment 2-1 (as referred to in the FEIS, Chapter 6, Page 9). The DNR has reviewed the referred-to Section 3.2.2.1 for additional information regarding groundwater pumping rate estimates. The DNR agrees with the studies proposed. Please direct future coordination with DNR Area Hydrologist Jack Gleason. Mr. Gleason can be contacted at john.gleason@state.mn.us or by phone at 651-259-5754. 1-1

DNR Comment 2-2 (as referred to in the FEIS, Chapter 6, Page 9). The DNR defers to the Minnesota Audubon Society for the topic of bird-friendly project design considerations. The DNR is aware of the ongoing conversations between project developers and the Minnesota Audubon and supports continued coordination efforts. The DNR also encourages project proposers to include, for interested parties, the mitigation measures that will be incorporated into the final project design on the project website. 1-2

Sincerely,
Melissa Doperalski

Melissa Doperalski
Department of Natural Resources
Environmental Review Planning Director
500 Lafayette Road, St. Paul, MN 55155
651.259.5082
melissa.doperalski@state.mn.us



- 1-1:** Comment noted regarding future point of contact at the Minnesota Department of Natural Resources specific to groundwater.
- 1-2:** The MSFA will continue to coordinate with the Minnesota Audubon Society regarding mitigation measures to minimize bird impacts by this project. As noted in the Final EIS, the MSFA will implement operational measures to minimize interference with migrating birds, such as turning off stadium lights during the overnight hours in spring and fall.

The MSFA will continue to provide timely information regarding the project design on the MSFA website (www.msfa.com).



1.2.2 Minnesota Pollution Control Agency



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300
800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us | Equal Opportunity Employer

August 16, 2013

Mr. Steve Maki
Director of Facilities & Engineering
900 South 5th Street
Minneapolis, MN 55415

Re: Minnesota Multi-Purpose Stadium Final Environmental Impact Statement

Dear Mr. Maki:

Thank you for the opportunity to review and comment on the Final Environmental Impact Statement (Final EIS) for the Minnesota Multi-Purpose Stadium project (Project) located in Minneapolis, Minnesota. The Project consists of construction of a new sports facility. Minnesota Pollution Control Agency (MPCA) staff has reviewed the Final EIS and have no comments at this time.

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 Final EIS, please contact me at 651-757-2508.

← 2-1

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



- 2-1:** Statement noted that the MPCA does not have comments on the Final EIS. Table 5.1 of the Final EIS identifies the known federal, state, and local permits and approvals anticipated for the Proposed Project, as well as current status. Included within that permit table is a list of anticipated permits/approvals required from the MPCA for the Proposed Project.



1.2.3 Metropolitan Council



August 19, 2013

Steve Maki, Director of Facilities & Engineering
Minnesota Sports Facilities Authority
900 South 5th Street
Minneapolis, MN 55415

RE: Minnesota Multi-Purpose Stadium – Final Environmental Impact Statement (FEIS)
City of Minneapolis, Hennepin County, Minnesota
Metropolitan Council Review File No. 21040-3
Metropolitan Council District 8

Dear Mr. Maki:

The Metropolitan Council received the Final Environmental Impact Statement (FEIS) for the Minnesota Multi-Purpose Stadium project in Minneapolis on August 1, 2013. The proposed project includes the construction of a new stadium on the current Hubert H. Humphrey Metrodome site. The project includes demolition of the existing Metrodome and construction of a new 65,000-seat stadium facility (with expansion of to 73,000 seats), and associated infrastructure improvements and changes in the surrounding area.

Metropolitan Council staff completed its review of the DEIS to determine its accuracy and completeness in addressing regional concerns (letter dated June 5, 2013), and offered technical comments concerning issues that need to be addressed or clarified in the Final EIS include comments regarding surface water management, wastewater, transportation impacts, transit and pedestrian access, aviation permits, and additional concerns related to potential threat to the local bird population.

The FEIS adequately responds to the Council’s previous comments. Staff offers the following comments on the final document.

Section 3.5.1.2 – Water Quality, Wastewaters (Roger Janzig, 651-602-1119)
The EIS states that the wastewater flow from this new development will be less than or equal to that already discharged by the facility currently occupying the site. Future review of this project will require that additional information be submitted to assist in a more accurate calculation of the potential wastewater flow that will be discharged by the project, and to determine potential system impact. However, based on the limited information provided in the EIS, the Metropolitan Disposal System appears to have adequate capacity for this project.

← 3-1

Section 3.7 – Transit & Pedestrian Access (James Harwood, 612-349-7339)
The Council appreciates the acknowledgement that the MSFA in coordination with Metro Transit will address access to the LRT platform including temporary or permanent plaza design features to assist in passenger queuing, signage and wayfinding to direct passengers to the LRT station and queuing areas, and the capacity of pedestrian routes to/from the stadium entry/exit points to the ticketing and queuing areas. However, modifications to the station and plaza to accommodate the necessary queuing should be listed as a required mitigation measure for this project. If adequate queuing space is not provided, the ridership projections used for this project in the EIS will not be met, and the EIS will not have fully addressed game-day transportation conditions.

← 3-2

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- 3-1:** The Final EIS contains the best information currently available on the Proposed Project's water use and wastewater generation. The MSFA will develop additional information regarding water use and wastewater generation during final design to satisfy plumbing design reviews and permits. The additional information developed will provide the quantitative data necessary to make a final determination regarding the relative difference in wastewater generation between the existing Metrodome facility and the Proposed Project.
- 3-2:** As the MSFA explained in response to a similar comment on the Draft EIS, the Proposed Project does not include any physical changes to the Downtown East LRT station, which is operated by Metro Transit, an operating division of the Metropolitan Council. The MSFA has no authority to upgrade or modify the Downtown East LRT station. However, the Proposed Project involves substantial modification of the existing Metrodome plaza. These modifications will mitigate pedestrian congestion in the plaza and Downtown East LRT station area after new Stadium events, and should ensure that the ridership projections used for the Proposed Project in the Draft EIS and Final EIS will be met.

First, as explained in response to a similar comment on the Draft EIS, the Proposed Project expands the existing plaza area on the west side of the Metrodome directly across from the Downtown East LRT station by moving the new Stadium's footprint to the east. Expanding the existing plaza area on the west side of the Metrodome should improve pedestrian movement in the vicinity of the Downtown East LRT station.

Second, the Proposed Project includes a plaza and park area of three full city blocks in either the east/west or north/south plaza orientations. Currently, the Metrodome plaza is confined to less than one city block just east of the Downtown East LRT station. With the current confined plaza, vendor tents and other operations associated with Metrodome events must be placed on the Downtown East plaza parcel. The confined nature of the existing plaza space adds to pedestrian congestion at the Downtown East LRT station. Under the Proposed Project, the expanded three-block plaza and park area should allow vendors to move their tents and other operations off of the Downtown East parcel. The Proposed Project's new three-block plaza and park area should mitigate congestion in the area of the Downtown East LRT station.

Third, the MSFA, as part of the Proposed Project and in consultation with Metro Transit, will address: (1) access to the Downtown East LRT platform from the new Stadium plaza, including temporary or permanent plaza design features to assist in passenger queuing; (2) signage and way finding to direct passengers to the Downtown East LRT station and queuing areas; and (3) capacity of pedestrian routes from the new Stadium exit and entry points to the ticketing and queuing areas at the Downtown East LRT station. See page 3-66 of the Final EIS.

Fourth, the MSFA, in concert with the City of Minneapolis and Metro Transit, will manage pedestrian access across Kirby Puckett Place to the Downtown East LRT station before and after new Stadium events. Management of pedestrian access across Kirby Puckett Place should mitigate any limitations to adequate queuing space at the Downtown East LRT station.

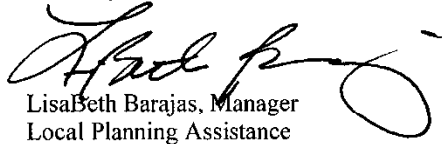
Finally, as explained in the response to comments on the Draft EIS, the MSFA will work with the Metropolitan Council and the City of Minneapolis to ensure that the Downtown East LRT station is able to conveniently and efficiently accommodate the queuing and loading of LRT passengers before and after new Stadium events.



Steve Maki, Director of Facilities & Engineering
August 19, 2013
Page 2 of 2

If you have any questions or need further information with respect to these matters, please contact the technical reviewer indicated in a particular section or contact me at (651) 602-1895.

Sincerely,



LisaBeth Barajas, Manager
Local Planning Assistance

CC: Julie Monson, MHFA
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Adam Duinick, Metropolitan Council District 8
Michael Larson, Sector Representative
Raya Esmaili, Reviews Coordinator

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1.2.4 City of Minneapolis



Department of Public Works
Steven A. Kotke, P.E.
City Engineer
Director

350 South 5th Street - Room 203
Minneapolis MN 55415

Office 612 673-3000
Fax 612 673-3565
TTY 612 673-2157

Mr. Steve Maki, P.E., Director of Facilities and Engineering
Minnesota Sports Facilities Authority
900 South 5th Street
Minneapolis, MN 55415
(via e-mail)

August 19, 2013

Dear Mr. Maki,

Enclosed with this e-mail are the City of Minneapolis comments on the July, 2013 Minnesota Multi-Purpose Stadium Final Environmental Impact Statement (FEIS). City Council approved the comments on August 16. The City has twenty-one comments. Some comments are important to the football game-day or other large-event day experiences. Some comments are more important to the other 350-some days of the year. The comments range from supportive of statements in the FEIS, to reinforcing the requirements and additional processes that the project must meet and complete, to urging the project to continue coordination of further designs with City staff. Summarized versions of the key comments are:

1. The City of Minneapolis appreciates the conversion of 6th Street S to a two-way street between Park Avenue and 11th Avenue as mitigation to the vacation of the existing 5th Street S provided that the detailed design will be safe for all modes. ← 4-1
2. A Traffic Management Plan, as described in the FEIS, will be crucial to mitigate the impact of the project and to allow for event arrival and departure that contributes to a positive game day experience for Vikings fans and the rest of the traveling public. ← 4-2
3. The City appreciates the continuing pedestrian analysis and looks forward to coordinating optimal design of pedestrian facilities with stadium designers. ← 4-3
4. The project needs to provide queuing space for the Downtown East Light Rail Station required to validate the assumptions of the FEIS and required to allow for a positive multi-modal game-day experience. ← 4-4
5. Some City comments memorialize discrepancies between groundwater information in the FEIS and other groundwater information provided by your civil engineer. ← 4-5
6. The City of Minneapolis and Minnesota Sports Facility Authority must enter into an agreement incorporating relevant groundwater information including but not limited to identifying permitting requirements, water quality and peak rates, connection size and locations, change conditions and responsibility. ← 4-6
7. The project will be subject to the stormwater management requirements and other requirements in the Minneapolis Code of Ordinances. Further review to determine compliance will be completed once plans have been further developed and submitted. ← 4-7

We appreciate the opportunity to provide comments on the FEIS. We hope that our comments will help the Minnesota Sports Facilities Authority identify and mitigate the impacts of this project on City infrastructure and neighborhoods. If you have any questions about this letter, please contact Jeff Handeland at jeff.handeland@minneapolismn.gov or at (612) 673-2363.

Cordially,


Steven Kotke, Director
Minneapolis Public Works



www.ci.minneapolis.mn.us
Affirmative Action Employer

Cc (via e-mail):

Jim Cima, Senior Project Manager Minnesota Vikings
Jeff Handeland, P.E., Public Works – Transportation Planning & Engineering
Chuck Lutz, Deputy Director Community Planning & Economic Development
Hilary Dvorak, Community Planning & Economic Development
Beth Elliot, Community Planning & Economic Development



- 4-1: Comment noted regarding support of specific information contained within the Final EIS.
- 4-2: Before the new Stadium opens, the MSFA will work with the City and other agencies to develop a Traffic Management Plan that addresses NFL and other large events.
- 4-3: Comment noted regarding the acknowledgment of additional pedestrian analysis included in the Final EIS. The MSFA is committed to continued coordination with the City of Minneapolis as the design advances.
- 4-4: As the MSFA explained in response to a similar comment on the Draft EIS, the Proposed Project does not include any physical changes to the Downtown East LRT station, which is operated by Metro Transit, an operating division of the Metropolitan Council. The MSFA has no authority to upgrade or modify the Downtown East LRT station. However, the Proposed Project involves substantial modification of the existing Metrodome plaza. These modifications will mitigate pedestrian congestion in the plaza and Downtown East LRT station area after new Stadium events, and should ensure that the ridership projections used for the Proposed Project in the Draft EIS and Final EIS will be met.

First, as explained in response to a similar comment on the Draft EIS, the Proposed Project expands the existing plaza area on the west side of the Metrodome directly across from the Downtown East LRT station by moving the new Stadium's footprint to the east. Expanding the existing plaza area on the west side of the Metrodome should improve pedestrian movement in the vicinity of the Downtown East LRT station.

Second, the Proposed Project includes a plaza and park area of three full city blocks in either the east/west or north/south plaza orientations. Currently, the Metrodome plaza is confined to less than one city block just east of the Downtown East LRT station. With the current confined plaza, vendor tents and other operations associated with Metrodome events must be placed on the Downtown East plaza parcel. The confined nature of the existing plaza space adds to pedestrian congestion at the Downtown East LRT station. Under the Proposed Project, the expanded three-block plaza and park area should allow vendors to move their tents and other operations off of the Downtown East parcel. The Proposed Project's new three-block plaza and park area should mitigate congestion in the area of the Downtown East LRT station.

Third, the MSFA, as part of the Proposed Project and in consultation with Metro Transit, will address: (1) access to the Downtown East LRT platform from the new Stadium plaza, including temporary or permanent plaza design features to assist in passenger queuing; (2) signage and way finding to direct passengers to the Downtown East LRT station and queuing areas; and (3) capacity of pedestrian routes from the new Stadium exit and entry points to the ticketing and queuing areas at the Downtown East LRT station. See page 3-66 of the Final EIS.

Fourth, the MSFA, in concert with the City of Minneapolis and Metro Transit, will manage pedestrian access across Kirby Puckett Place to the Downtown East LRT station before and after new Stadium events. Management of pedestrian access across Kirby Puckett Place should mitigate any limitations to adequate queuing space at the Downtown East LRT station.

Finally, as explained in the response to comments on the Draft EIS, the MSFA will work with the Metropolitan Council and the City of Minneapolis to ensure that the Downtown East LRT station is able to conveniently and efficiently accommodate the queuing and loading of LRT passengers before and after new Stadium events.



- 4-5:** Response to this comment is provided in the detailed responses to City of Minneapolis comments 4-16, 4-17, 4-27, and 4-28.
- 4-6:** Comment noted. The Final EIS presents the best information currently available regarding groundwater. In addition, the MSFA commits to providing the City with updated information as it becomes available.
- 4-7:** Comment noted. The MSFA commits to meeting applicable local requirements.



City of Minneapolis comments on the Minnesota Multi-Purpose Stadium Final EIS

1. Traffic Analysis and Other Transportation Analysis

On page 3-28 and other pages - The City appreciates conversion of 6th Street to two-way operation between Park and 11th Avenues and recognizes the conversion as substantial mitigation for the impacts of the 5th Street closure on the roadway network pending a detailed design of 6th Street that is adequate to safely serve all modes of transportation. ←4-8

On page 3-33 – The City disagrees with the statement that, “Event arrival was generally uncongested.” ←4-9

On page 3-34 – The City disagrees with the omission of 3rd Street from the roads listed which undergo significant congestion during event departures. The second bullet on the page lists only Washington Avenue, 11th Avenue, 6th Street, and Park Avenue. ←4-10

On page 3-47 – Table 3.7-16 indicates that a concert might be held at the stadium any evening of the week. Concert events have the potential to impact traffic more than a Vikings Game. Concert events will have to be addressed in the Minnesota Multi-Purpose Stadium Traffic Management Plan. ←4-11

On page 3-51 – A Traffic Management Plan for all modes of travel will be critical to a positive event experience for game days as well as other minor and major stadium events. A copy of the Twins Ballpark Traffic Management Plan is attached to these comments and could be used as an example to consider in the Traffic Management Plan preparation process for the Minnesota Multi-Purpose Stadium. ←4-12

On pages 3-60 through 3-63 – The City appreciates the additional pedestrian analysis and looks forward to coordinating optimal design of pedestrian facilities with stadium designers. ←4-13

On page 3-66 – The City concurs with the recommended measures to facilitate transit ridership and to minimize or reduce the conflicts between pedestrians and LRT at the 4th Street/Chicago Avenue intersection during events. ←4-14

On pages 3-67 and 6-46 –The expansion of the plaza area should include the area bounded by Park Avenue, 4th Street and the Downtown East LRT station. The City disagrees with the omission of that expansion as a mitigation measure. If adequate queuing space is not provided, then the ridership projections used for the EIS will not be realized and game-day transportation conditions will be worse than projected in the EIS and the mitigation measures in the EIS will not suffice. ←4-15



- 4-8:** Comment noted regarding support of specific information contained within the Final EIS.
- 4-9:** The statement from the Final EIS referenced in the comment was based on observation of existing conditions around the Metrodome. The description of existing event arrival conditions does not change the assessment of impacts of the new Stadium.
- 4-10:** The statement from the Final EIS referenced in the comment was based on observation of existing conditions around the Metrodome. The categorization of the level of existing congestion on 3rd Street does not change the assessment of impacts of the new Stadium.
- 4-11:** Before the new Stadium opens, the MSFA will work with the City and other agencies to develop a Traffic Management Plan that addresses NFL and other large events such as concerts.
- 4-12:** Before the new Stadium opens, the MSFA will work with the City and other agencies to develop a Traffic Management Plan that addresses NFL games days, as well as other major and minor new Stadium events.
- 4-13:** Comment noted regarding the acknowledgment of additional pedestrian analysis included in the Final EIS. The MSFA is committed to continued coordination with the City of Minneapolis as the Proposed Project's design advances.
- 4-14:** Comment noted regarding the City's concurrence on recommended measures included in the Final EIS to facilitate transit ridership and to minimize or reduce the conflicts between pedestrian and LRT at the 4th Street/Chicago Avenue intersection during events.
- 4-15:** See response to City of Minneapolis comment 4-4.



2. Groundwater and Stormwater

On page 3-5 – It is not the City’s understanding that the existing Metrodome groundwater interception system is pumped solely to the sanitary sewer system. This statement also contradicts later statements in the EIS identifying the groundwater interception system as being discharged to both storm and sanitary. As plans are developed, verification of the existing system should be provided as it will likely influence decisions on any proposed groundwater pumping.

← 4-16

On page 3-5 – The City does not feel it has been adequately demonstrated that the proposed groundwater pumping will be reduced from the existing conditions. Additional review of any proposed groundwater pumping activities must be completed as plans progress.

← 4-17

On page 3-5 – Discharge of groundwater to the storm sewer system is subject to approval by the City. Several issues must be addressed, including but not limited to water quality, quantity and volume. The City looks forward to receiving additional information related to any proposed groundwater discharges.

← 4-18

On page 3-5 – The appropriate location of any proposed groundwater discharge into the storm sewer system has not been fully evaluated. The discharge connection should occur in the location that provides the greatest benefit in relation to several groundwater and storm water characteristics, including but not limited to quality, quantity and volume. The appropriate location should be determined once additional information and plans have been developed.

← 4-19

General – Upon receipt of project details, the City of Minneapolis and Minnesota Sports Facility Authority must enter into an agreement incorporating relevant groundwater information including but not limited to identifying permitting requirements, water quality and peak rates, connection size and locations, change conditions and responsibility.

← 4-20

On page 3-6 – In the No Action Alternative, the Metrodome would likely not continue to function as it currently does. As has been stated in the EIS, the site currently does not have a DNR Water Appropriations Permit even though the thresholds requiring a permit are being exceeded. Discharge of groundwater to the City sanitary sewer could also be subject to metering and charges. Should the No Action Alternative be applied, additional conversations will be necessary on these topics. Similar comment to the No Action Alternative on page 3-17.

← 4-21

On page 3-7 – The erosion and sediment control measures planned for use during and after construction will also need to meet or exceed the requirements of Title 3, Chapter 52 of the Minneapolis Code of Ordinances. The City looks forward to reviewing plans once they have been developed.

← 4-22



- 4-16:** The existing Metrodome groundwater interception system is discharged to both storm and sanitary sewer. The MSFA understands that the storm sewer discharge connects to the City storm sewer system along 5th Street which ultimately discharges to the 11th Avenue tunnel, and that the sanitary sewer discharge outlets to the 11th Avenue sanitary system.
- 4-17:** Based on the best information currently available, the MSFA estimates that the new Stadium will potentially generate more groundwater discharge than the Metrodome. The new Stadium's proposed playing field elevation will be approximately two feet above the current Metrodome playing field elevation, which will reduce groundwater discharge. However, the total footprint area of the new Stadium will be larger than the current Metrodome footprint. The larger total footprint of the new Stadium is the reason that the new Stadium will potentially generate more groundwater discharge than the existing Metrodome.
- 4-18:** The Final EIS presents the best information currently available regarding groundwater discharge from the Proposed Project to the storm sewer. Further coordination with the City will occur regarding the discharge of groundwater to the storm sewer system as the Proposed Project's design progresses.
- 4-19:** The Final EIS presents the best information currently available regarding the appropriate location for groundwater discharge from the Proposed Project to the storm sewer. Further coordination with the City will occur regarding the location of the groundwater discharge to the storm sewer system as the Proposed Project's design progresses.
- 4-20:** Comment noted. The Final EIS presents the best information currently available regarding groundwater. In addition, the MSFA commits to providing the City with updated information as it becomes available.
- 4-21:** The Final EIS presents the best information currently available regarding existing annual Metrodome groundwater pumping rates. Using this information, the MSFA estimates that the existing annual Metrodome groundwater pumping discharge volume is above the permit threshold for a DNR Water Appropriation permit. In addition, the existing Metrodome groundwater pumping discharges are not metered and no wastewater charges are paid to the City for this discharge. In the No Action Alternative, the MSFA would work with the City and other agencies to understand how continued operation of the existing Metrodome facility would address current requirements for permits, metering, and discharge fees.
- 4-22:** Comment noted. The MSFA commits to meeting applicable local requirements.



On page 3-10 – Should regional stormwater treatment be proposed for the Downtown East Block, or any other sites within the project area, appropriate easements, agreements and encroachment permits will be required to be provided in order to be considered in compliance with Title 3, Chapter 54 of the Minneapolis Code of Ordinances. As plans are developed, consideration should be given to these easements, agreements and encroachment permits.

← 4-23

On page 3-11 – The Proposed Project will be subject to the rate control and water quality requirements of Title 3, Chapter 54 of the Minneapolis Code of Ordinances. While the City does not have a volume control requirement, it does encourage volume control measures where site conditions are suitable. Review for compliance with Chapter 54 will be completed upon further development of plans.

← 4-24

On page 3-10 to 3-11 – Title 3, Chapter 54 of the Minneapolis Code of Ordinances requires discharge rates to the various systems to be maintained at or below existing rates. Review of any proposed discharges and connection locations will be completed upon further development of plans.

← 4-25

On page 3-16 – City records indicate a 60-inch sewer in 11th Avenue. The City will further review the appropriateness of the proposed connection locations upon further development of plans.

← 4-26

On page 3-16 – Earlier in the EIS it had been stated that the groundwater dewatering discharge would be directed to the storm sewer system. The groundwater discharge volumes identified here also conflict with those identified earlier in the EIS. Further analysis of the proposed groundwater pumping activities must be completed to provide accurate and consistent information to the City.

← 4-27

On page 58 – In response to the City’s comment that the potential for contamination migration due to the proposed groundwater pumping should be evaluated, it was stated that the volume of groundwater to be pumped will be comparable to the volume pumped at the Metrodome. It is the City’s understanding that additional evaluation of proposed groundwater pumping will be completed and that the volume may not be comparable. It is also stated that the present dewatering effluent and storm drainage are directed to the sanitary sewer from internal areas. This is not the City’s understanding of the existing conditions.

← 4-28



- 4-23:** Comment noted. The MSFA commits to meeting applicable local requirements and coordinating with the City regarding any easements, agreements, and/or encroachments that may be needed.
- 4-24:** The Proposed Project will meet applicable rate control requirements of the City of Minneapolis and applicable volume control requirements in an NPDES permit. The MSFA acknowledges that further review by the City will occur as the Proposed Project's design progresses.
- 4-25:** Comment noted. The MSFA commits to meeting applicable local requirements.
- 4-26:** The current plans indicate the Proposed Project's storm sewer will connect to the existing 48 inch private storm sewer, which is directly connected to the drop shaft of the 11th Avenue tunnel. The connection point will be coordinated with the City as the Proposed Project's final design is developed further.
- 4-27:** See responses to comments 4-16 and 4-17.
- 4-28:** As stated in response to comment 4-17, based on the best information currently available, the MSFA estimates that the new Stadium will potentially generate more groundwater discharge than the existing Metrodome. The new Stadium's proposed playing field elevation will be approximately two feet above the current Metrodome playing field elevation, which will reduce groundwater discharge. However, the total footprint area of the new Stadium will be larger than the current Metrodome footprint. The larger total footprint of the new Stadium is the reason that the new Stadium will potentially generate more groundwater discharge than the existing Metrodome. The MSFA cannot currently determine the exact amount of the potential increase and the exact volume of groundwater discharge from the new Stadium. The MSFA has tested the existing groundwater discharged by the Metrodome for contaminants of concern and the analytical test results did not detect any such contaminants. There is the possibility that increased groundwater pumping associated with the Proposed Project may result in the migration of unknown contaminants to the groundwater pumping area. The MSFA, which has been working closely with the City on stormwater and groundwater issues, intends to continue these ongoing discussions with the goal of ensuring that contaminated groundwater does not enter the City storm sewer system.



1.2.5 Hennepin County



Hennepin County Administration

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August 19, 2013

Mr. Steve Maki
Director of Facilities & Engineering
Minnesota Sports Facilities Authority
900 South 5th Street
Minneapolis, MN 55415

Dear Mr. Maki:

On behalf of Hennepin County I am submitting these comments on the Final Environmental Impact Statement (FEIS) for the Minnesota Multi-Purpose Stadium. Let me begin by expressing appreciation to the Metropolitan Sports Facilities Authority (MSFA) for the clarifications provided in response to Hennepin County comments on the Draft Environmental Impact Statement (DEIS) that addressed several concerns including: continuous access to the Forensic Sciences Building and the Hennepin County Medical Center (HCMC) during and subsequent to construction; waste management goals and practices; and plans for the measurement and management of vibrations, dust and other construction impacts. The additional detail provided in the FEIS on pedestrian facilities is helpful and the final design for reconstruction of 6th street as a two-way road between Park and 11th Avenues is very responsive to expressed Hennepin County concerns. Nevertheless, I cannot overstate the critical nature of multiple county functions operating out of the forensic sciences building, HCMC and our Energy Center. Access to these buildings cannot be compromised or operations interrupted or jeopardized due to construction impacts (i.e. vibration, noise, dust, etc.).

← 5-1

The County remains deeply concerned that the MSFA is not acknowledging sufficient responsibility or plans for ensuring the orderly and safe passage of stadium visitors to and from the LRT transit station adjacent to the stadium. The FEIS explicitly notes that the “the new Stadium project does not include any physical changes to the Downtown East LRT station which is operated by Metro Transit” and that MSFA “will encourage the Metropolitan Council to ensure that the Downtown East station is able to conveniently and efficiently accommodate the queuing and loading of LRT passengers.” We understand the important distinctions between the authorities and responsibilities of the MSFA and Metropolitan Council and are not suggesting that the MSFA assume Met Council responsibilities. The fact remains, however, that

← 5-2



- 5-1:** Comment noted. The MSFA will continue to work with Hennepin County Administration regarding access to County facilities.



no substantive provision has been made for facility design or operations that considers or details how 25,000 or more attendees will safely and efficiently access LRT vehicles before and after future events.

We also believe this issue cannot be successfully addressed unilaterally by either Metro Transit or the MSFA. It will require the time, commitment and resources of each to get the job done. We urge the MSFA and Met Council to make this commitment and engage the effort to detail resolution of this issue prior to opening day of the stadium. The regional transit system is growing and the ridership of a single LRT corridor today will more than double by the end of next year. It may double again within the next decade. Our regional transit system will increasingly get patrons to and from stadium events. The physical space to accommodate the patrons correlates directly to the 'experience' at the game. This region is planning, designing, constructing and operating a first class regional transit system as well as a first class Multi-Purpose Stadium. Failure to address the station needs in front of the stadium will be a detriment to our region. The taxpayers that will finance and use these facilities deserve nothing less.

Very truly yours,

A handwritten signature in blue ink, appearing to read "David J. Hough".

David J. Hough

County Administrator

C: Commissioners



5-2: See Response to City of Minneapolis comment 4-4.