

2 copies

LEGISLATIVE REFERENCE LIBRARY
HT168.B6 A47 1984

- Airport South final environmental



3 0307 00055 3886

850609



HT
168
.B6
A47
1984

port south final environmental impact statement

ed for: minnesota environmental quality board

ed by: city of bloomington, minnesota and BRW, Inc.

october 1984

AIRPORT SOUTH TRANSPORTATION & ENVIRONMENTAL MANAGEMENT STUDY PARTICIPANTS

COORDINATING GROUP

James H. Lindau, Chairman
Douglas H. Differt
Bruce Nawrocki
A. J. Lee
Gertrude Ulrich
Wilfred C. Viitala

City of Bloomington
Minnesota Dept. of Transportation
Metropolitan Transit Commission
Hennepin County
Metropolitan Council
Metropolitan Airports Commission

CITIZEN'S ADVISORY COMMITTEE

Douglas Engebretson, Chairman
Wayne Popham, Vice Chairman
Michael Bosanko
Thomas Colbert
Burton F. Dahlberg
Mike Falk
Max Gerard
Paul Hufnagle
Stuart A. Johnson
Dennis Kraft

David G. McDonell
Charles E. Mertensotto
John E. Moran
Russell L. Olson
Cecilia E. Paget
Bruce Peterson
Dale Runkle
Robert Van Hoef
John Voss

DEVELOPERS/LANDOWNERS ADVISORY COMMITTEE

John Karr, Chairman
Bill Queenan, Vice Chairman
Dennis L. Alfton
William O. Cooley
Edward Crozier
James W. Decker
Tim Dwyer

Scott Godin
Donald A. Jacobson
John N. Justice
John Komula
Leo W. McGuire
Jim F. O'Neil
Larry Reid
Steve Wheeler

PROJECT MANAGEMENT TEAM

Ghaleb Abdul-Rahman, Project Manager
Lyle Berg
Greg Downing
Nigel Finney
Rick Geshwiler
Dennis Hansen
Larry Lee
Suzanne Pelly
Dorene Roeglin
Barbara Senness
Fred Tanzer
Marlene Voita

Metropolitan Council
City of Bloomington
Minnesota Environmental Quality Board
Metropolitan Airports Commission
City of Bloomington
Hennepin County
City of Bloomington
Minnesota Pollution Control Agency
Metropolitan Transit Commission
Metropolitan Council
Minnesota Dept. of Transportation
Minnesota Pollution Control Agency

NOTE: Other committee members during the project include: Charles Weaver, Gerry Issacs, Paul Joyce, Chuck Kenow, Tom Rulland, and Craig Spencer.

AIRPORT SOUTH FINAL ENVIRONMENTAL IMPACT STATEMENT

Prepared by:

City of Bloomington
BRW, Inc.

Responsible Governmental Unit

Environmental Quality Board

For Further Information Contact:

City of Bloomington
John Pidgeon, City Manager
2215 West Old Shakopee Road
Bloomington, MN 55431

(612) 881-5811

Environmental Quality Board
Greg Downing
100 Capital Square Building
550 Cedar Street
St. Paul, MN 55101
(612) 296-8253

BRW, Inc.
Richard Wolsfeld
Thresher Square
700 Third Street South
Minneapolis, MN 55415

(612) 370-0700

Project Proposer:

City of Bloomington
2215 West Old Shakopee Road
Bloomington, MN 55431

Abstract: The Final Environmental Impact Statement (FEIS) for the Airport South District consists of this document plus the previously circulated Draft Environmental Impact Statement (DEIS). This document provides supplemental information or additional clarification of information contained in the DEIS and responds to comments received on the DEIS. This generic EIS (comprised of the DEIS and FEIS) documents the potential cumulative environmental impacts associated with the projected development of the Airport South District of Bloomington as a high intensity mixed-use urban area and identifies appropriate mitigation measures where potential adverse impacts are likely so that a decision can be made on the appropriate manner in which to develop the area in the least environmentally harmful manner.

Determination of Adequacy: The EQB will determine the adequacy of the Airport South generic EIS at a meeting on November 15, 1984.

CONTENTS

	<u>Page</u>
1.0 SUMMARY	1-1
2.0 SUPPLEMENTAL INFORMATION	2-1
2.1 Governmental Permits and Approvals Required	2-1
2.2 Transportation and Air Quality	2-1
2.3 Noise	2-9
2.4 Water Quality	2-11
2.5 Groundwater	2-16
2.6 Vegetation and Wildlife	2-17
3.0 RESPONSES TO DEIS COMMENTS	3-1
3.1 Letters of Comment on DEIS	3-1
3.2 Public Hearing Comments	3-59

FIGURES

1. Noise Barrier and Land Use Conversion Areas	2-10
--	------

TABLES

2.1 Federal, State, and Local Permits or Approvals Required	2-2
2.2 Summary of Assumptions for Transportation and Air Quality Analysis Alternatives	2-5
2.4 Transportation and Air Quality Impact Summary	2-6
2.4 Total Annual Loadings to Long Meadow Lake from Airport South District Watersheds	2-14
2.5 Selected Vegetation Impacts Summary	2-19
2.6 Median Snow Depths at Minneapolis-St. Paul Airport	2-23

SUMMARY

PURPOSE OF GENERIC EIS

The purpose of the generic EIS is to study projects that are not adequately reviewed on a case-by-case basis. A generic EIS differs from a site-specific EIS in that its purpose is to study a number of individual projects collectively in order to evaluate the potential cumulative effects of these individual actions which by themselves may not result in any significant environmental impacts. It is not the purpose of the generic EIS to examine all the potential impacts of every individual project.

DESCRIPTION OF PROPOSED ACTION

In this generic EIS the projects are the specific site developments projected to occur through the year 2000 in the Airport South District of the City of Bloomington and the transportation improvements needed to serve the traffic generated by that anticipated development. The City of Bloomington has projected an increase of 2,535 residential units, 2,265 hotel/motel rooms, and approximately 5.2 million square feet of commercial development in the Airport South District by the year 2000. The commercial development is expected to be primarily office with a retail component of approximately 900,000 square feet. In order to serve traffic generated by this development the City of Bloomington has proposed several transportation improvements to increase the capacity and efficiency of the transportation system serving the Airport South District.

GOVERNMENTAL APPROVALS

Federal, state and local permits and approvals will be required for many of the site-specific projects covered by this generic EIS. These permits and approvals are listed in Table 4.1 of the DEIS. Most of these permits and approvals will be applied for on a site-specific basis. However, the City of Bloomington does intend to apply for an area-wide indirect source permit and all information needed for this permit has been gathered and presented in this DEIS.

ALTERNATIVES

Two basic alternatives are evaluated in the DEIS: a build and a no-build. Because of the method used to define alternatives for the DEIS the alternatives consist of the following three components:

- A development component
- A transportation facilities component
- A travel demand management component

Alternatives are defined for each of these components.

Development Component

The development component consists of the build and no-build development alternatives. Under the build development alternative, two sub-alternatives were defined for development along the bluff edge. These bluff edge development alternatives were defined to evaluate the visual and environmental impacts associated with development down to either the 760-foot or 800-foot contour of the bluff.

Travel Demand Management Component

Traffic forecasts used to evaluate transportation, air and noise impacts were developed for the following three levels of travel demand management.

- No travel demand management
- Moderate travel demand management
- High travel demand management

Analysis was done to determine the level of travel demand management necessary to mitigate traffic, air and noise impacts resulting from the new development.

Transportation Facility Component

The roadway improvements required to serve the projected development were defined and then specific analysis alternatives were selected which related the phasing of development with roadway improvements and travel demand management. The alternatives selected for analysis included the no-build; a 1990 build development alternative with limited roadway improvements and no travel demand management; a 1990 build development alternative with the proposed roadway improvements and no travel demand management; a 1995 build development alternative with the proposed roadway improvements and moderate travel demand management; and a 2000 build development alternative with proposed roadway improvements and moderate travel demand management.

ENVIRONMENTAL, ECONOMIC, AND SOCIOLOGICAL IMPACTS

The projected development in the Airport South District of the City of Bloomington has the potential to result in environmental, community, and economic impacts. The areas of potential environmental impact analyzed in the DEIS (Section 6) are:

Transportation. Congestion on the regional roadway system is forecast to occur under both the build and no-build alternatives by the year 2000. With the build alternative, on-site roadway improvements will be required to serve the year 2000 forecast traffic under any level of travel demand management, but fewer roadway improvements will be needed if the moderate level of travel demand management is achieved. The existing roadway system in Airport South with the improvements currently under construction at the 34th Avenue/I-494 interchange does

have some remaining capacity to serve additional development in the Airport South District.

Air Quality. The DEIS indicates that no significant air quality impacts are expected.

Noise. The DEIS examines both aircraft noise and traffic noise impacts. The Airport South District lies within aircraft noise zones for the Minneapolis-St. Paul International Airport and the Metropolitan Council has established guidelines for land use compatibility with aircraft noise. The development in the Airport South District will increase traffic within the District and therefore potentially increase noise levels. The proposed upgrading of TH 77 between East 86th Street and I-494 will mitigate noise impacts along TH 77 due to the lowering of the grade of TH 77, but state noise standards will not be met under either the build or no-build alternatives. State noise standards are also exceeded on East Old Shakopee Road for both alternatives, however the build alternative does not significantly increase noise levels in this area over the existing levels.

Waste Water. There is a potential need for increased sanitary sewer system capacity in the Airport South District. However, projected flows are consistent with the City's amended comprehensive sewer plan approved by the Metropolitan Council and no impacts on water quality are expected.

Storm Water. Surface water runoff from the site could increase pollutant loadings to Long Meadow Lake, if adequate treatment measures are not implemented. With more development in Airport South surface water runoff is expected to increase.

Groundwater. An increase in surface water runoff can be expected to affect groundwater flows in the glacial drift overlying the bedrock aquifers. However, construction of the proposed interchange at TH 77 and Killebrew Drive is not expected to affect the groundwater flows to springs on the bluff.

District Heating. District heating does appear feasible in the Airport South District. Initial studies have shown marginally positive environmental impacts for the first phase systems studied. The environmental impacts of a district heating system will be evaluated in a separate environmental review, if a decision is made to proceed with a district heating system in the Airport South District.

Vegetation and Wildlife. Bluff edge development down to the 760-foot elevation would have a greater impact on vegetation and wildlife than development above the 800-foot elevation. The development of the Airport South District could result in a reduction and change in wildlife habitat within the District. Development down to the 760-foot contour could potentially eliminate up to 31 acres of old growth deciduous upland forest which is considered to be important winter deer habitat. This habitat loss could result in an adverse impact on the wintering deer herd.

Historic and Archeological. Five sites of prehistoric significance have been identified within the Airport South District and there is a possibility of uncovering new sites and artifacts. Development along the bluff edge could potentially disturb these sites and destroy remaining artifacts.

Scenic Views and Vistas. Development along the bluff edge and at other locations in the Airport South District has potential for impacts on scenic views and vistas. The greatest visual impacts will be on views from the recreational use areas in the Minnesota River Valley. Development down to the 760-foot contour would intrude further into the "natural" river valley while development above the 800-foot contour would be less visually absorbed by the vegetation on the bluff.

Park and Recreation Areas. No significant impact under any alternative is expected on park and recreation areas other than the impacts addressed in other sections of the DEIS.

Conformance with Local and Regional Plans. The projected development is consistent with local and regional plans except for a conflict which exists on one parcel between the U.S. Fish and Wildlife Service Plan and the City of Bloomington Comprehensive Plan. Resolution of this plan conflict is not within the scope of the Generic EIS.

Economic. Development projections prepared by the City of Bloomington for the Airport South District were based on developers' proposals in the area and an analysis of the area's historic and projected regional market shares of commercial and residential development. The new development is expected to create an additional 17,000 jobs within the Airport South District. The population is projected to increase by 4,500. The projected incremental annual property tax revenues from the development are \$11 million by the year 2000. The total cost for roadway improvements within the District was estimated at approximately \$31,000,000.

Sociological. The DEIS indicates that sociological impacts are not significant.

MITIGATION MEASURES

Transportation. The biggest measure for mitigating traffic impacts of the development will be the implementation of travel demand management. Travel demand management with metering on I-494 will significantly increase the amount of development in the Airport South District which the regional highway system can support.

Noise. New development in the Airport South District will be consistent with the Metropolitan Council's Guidelines for Land Use Compatibility with Aircraft Noise. Traffic noise impacts along TH 77 may be mitigated by construction of noise walls or may involve a change in land use adjacent to the west side of TH 77 from residential to commercial.

Stormwater. Impacts on water quality from stormwater runoff can be mitigated by reducing the volume of runoff through infiltration and by on-site erosion and sediment control. The efficiency of treatment basins can also be increased by increasing the percentages of stormwater runoff treated by the new stadium stormwater outfall treatment basin. The City of Bloomington has also developed a hazardous material spill plan to control accidental spills of hazardous materials.

Vegetation and Wildlife. Impacts on vegetation and wildlife can be mitigated by careful site development and compliance with the recommended practices in the Bloomington Comprehensive Plan, the Bloomington Bluff Report and this DEIS.

Scenic Views and Vistas. Most of the potential visual impacts of bluff edge development can be mitigated by adherence to the Urban Design Principles of the Bloomington Bluff Report.

COORDINATION

The Airport South Study organization was designed to involve responsible governmental agencies and other interested groups in the study. Meetings were held throughout the study with the various study groups and committees to get input and direction. In addition meetings were held with other affected agencies and interested parties to obtain their input.

SUPPLEMENTAL INFORMATION

2.1 GOVERNMENTAL PERMITS AND APPROVALS REQUIRED

In addition to the projected development in the Airport South District, some roadway improvements and extensions of the sanitary and storm sewer system are planned. Table 2.1 is intended to provide a comprehensive list of all of the governmental permits and approvals that may be required by these projects. Table 2.1 identifies several permits and approvals related to the stadium area overflow stormwater sewer system currently under construction. The permits and approvals have already been granted for this project.

Most of the permits and approvals identified in Table 2.1 will be applied for on a site specific basis and some of the information needed for these permits may be included in this generic EIS.

However, it is the City of Bloomington's intention to apply for an area-wide indirect source permit and the necessary information needed for this permit has been gathered and presented in this EIS.

2.2 TRANSPORTATION AND AIR QUALITY

2.2.1 TRANSPORTATION AND AIR QUALITY IMPACTS

Five alternatives were analyzed in the DEIS for the purpose of evaluating traffic and air quality impacts as they relate to the staging of development and the construction of required roadway improvements. These analysis alternatives were based on the development phasing projections shown in Table 3.3, page 3-9 of the DEIS and different assumptions relative to the implementation of required roadway improvements and travel demand management techniques. The assumptions made for each analysis alternative are summarized in Table 2.2. The results of the analysis of these alternatives is summarized in Table 2.3.

In general the analysis indicates that with the Phase I planned improvements to the 24th Avenue/I-494 interchange, the local roadway system will be able to support development projected through 1990 with no travel demand management without causing violations of state ambient air quality standards. With the proposed upgrading of TH 77 from East 86th Street to I-494 and a moderate level of travel demand management, the local roadway system will be able to support the development projected through the year 2000 without causing violations of state ambient air quality standards. I-494 is expected to reach capacity sometime between 1992 and 1997 but the forecast traffic demand on I-494 is not expected to cause violations of state ambient air quality standards.

TABLE 2.1

FEDERAL, STATE AND LOCAL PERMITS OR APPROVALS REQUIRED

TYPE OF APPLICATION/APPROVAL	AGENCY	COMMENTS	STATUS
<u>FEDERAL:</u>			
Section 404 Permit - Permit to discharge dredge or fill material into waters of U.S.	U. S. Army Corps of Engineers	Required for proposed storm drainage system which includes discharge and placement of materials in wetlands.	Granted-Additional permits may be required to make any modification to existing system.
Utility Permit - Permit to construct utility on Federal land.	U. S. Fish and Wildlife Service	Required for proposed storm drainage system which terminates in the Minnesota Valley National Wildlife Refuge.	Granted-Additional permits may be necessary to make any modifications to existing system.
Federal EIS	Federal Highway Administration	Required for some roadway projects applying for federal financial participation.	By meeting federal procedures for "scoping" the State EIS will generally meet the requirements for projects having federal financial participation.
Location and Design Approval	Federal Highway Administration	FHWA has location and design approval on projects using federal funds	To be applied for on project specific basis.
Location and Design Approval	Federal Aviation Administration	If 76th Street is extended across Airport property review and approval by FAA is required.	To be coordinated on project specific basis.
<u>STATE:</u>			
Permit to Work in Protected Waters	Minnesota Department of Natural Resources	Required for proposed storm drainage system which involves construction in public waters.	Granted
Water Appropriation Permit	Minnesota Department of Natural Resources	Permit required if permanent de-watering system is built in the vicinity of the Cedar Avenue/Killebrew Drive interchange.	To be applied for on a project specific basis.
Environmental Assessment Worksheet or Environmental Impact Statement	Environmental Quality Board/ City of Bloomington	The City of Bloomington has adopted an alternative environmental review ordinance which covers site-specific projects in the Airport South District that do not require a state permit. Any project listed in a mandatory EAW or EIS category of the state environmental review program must prepare an environmental document for the project incorporating the relevant material in the generic EIS by "tiering".	To be completed when specific projects are proposed which exceed mandatory thresholds.

TABLE 2.1 Continued

TYPE OF APPLICATION/APPROVAL	AGENCY	COMMENTS	STATUS
Section 401 Certification Approval of Section 404 Permit	Minnesota Pollution Control Agency	Required for proposed storm drainage system.	Approved. Approval of any modifications to existing system may also be required.
Indirect Source Permit (Area-wide) - Permit required for construction of projects which have potential to affect air quality.	Minnesota Pollution Control Agency	Area-wide application to be based on potential impacts of cumulative development in study area. Permit would apply to all actions which are consistent with the conditions used in the area-wide ISP.	To be applied for after the completion of the generic EIS.
Sewer Extension Permit	Minnesota Pollution Control Agency	Any trunk or lateral sewer extensions will require sewer extension permit from MPCA.	To be applied for on case-by-case basis.
Indirect Source Permit (Site-Specific)	Minnesota Pollution Control Agency	Until area-wide permit is granted, site specific projects which trigger ISP thresholds must obtain individual permits.	To be applied for on project specific basis until area-wide ISP granted.
Location and Design Approval	Minnesota Department of Transportation	Roadway projects using State funds or involving roadways under State jurisdiction must have location and design approval from MnDOT.	To be applied for on a project specific basis.
Height Obstruction Limits	Mn/DOT Aeronautics, and FAA, and MAC	Airport South District is in Airport Safety Zone C. Building heights are restricted to 150-feet above Airport reference elevation.	Any building proposed which exceeds height limitation must obtain variance.
<u>REGIONAL:</u>			
Interchange Additions or Revisions	Metropolitan Council and Minnesota Department of Transportation	Request for interchange additions or revisions must be made to the Metropolitan Council and to the implementing agency. The proposed interchange at Killebrew Drive would be within Mn/DOT's jurisdiction.	To be applied for.
Metropolitan Significance	Metropolitan Council	Metropolitan Council or affected governmental unit may initiate a significance review to determine if an action is of Metropolitan significance. If a proposed action is determined to be of Metropolitan significance the Council may suspend the proposed action for up to one year or until measures are adopted which would minimize effects upon metropolitan system plans.	No activity.

TABLE 2.1 Continued

TYPE OF APPLICATION/APPROVAL	AGENCY	COMMENTS	STATUS
Guidelines for Land Use Compatibility With Aircraft Noise	Metropolitan Council	Development in the Airport South District should comply with guidelines.	To be coordinated under the Land Planning Act review process.
Location and Design Approval	Metropolitan Airports Commission	If 76th Street is extended across airport property, review and approval by MAC is required.	To be coordinated on project specific basis.
<u>COUNTY:</u>			
Location and Design Approval	Hennepin County	Roadway projects involving county funds or roads under county jurisdiction must meet county design standards and receive county approval of location and design.	Plans to be submitted on project specific basis.
<u>LOCAL:</u>			
Approval for Construction in the Minnesota River Flood Plain	Lower Minnesota River Watershed District Board	To construct the earthen embankments as part of the proposed storm drainage system, it is necessary to demonstrate that flood levels are not adversely affected.	Lower Minnesota River Watershed Authority was notified of storm drainage plans.
Rezoning	City of Bloomington	Several areas within the study area will require rezoning to be consistent with the proposed Airport South district zoning. This action can be initiated either by the City or by a specific developer.	Application has been made for rezoning of the stadium site from CR-1 to CX-2.
Planned Development Approval	City of Bloomington	Developer may apply for Planned Development District Zoning for development which would not comply with original zoning. Developer must submit preliminary development plan along with application for rezoning.	City Council approval of final development plan required prior to submittal of final site and buildings plans.
Final Site and Building Plan Approval	City of Bloomington	All development projects require City Council approval of final site and building plans.	City Council cannot approve final site and building plans on projects requiring EAW or EIS until after EAW or EIS has been approved. Projects qualifying for alternative review under the City environmental ordinance can proceed with City concurrence prior to the completion of the generic EIS.

NOTE: The information in this table was derived from the rules and regulations of various agencies. Please refer to the original documents for specific details.

TABLE 2.2
SUMMARY OF ASSUMPTIONS FOR TRANSPORTATION AND AIR QUALITY ANALYSIS ALTERNATIVES

ANALYSIS ALTERNATIVES	ROADWAY ASSUMPTIONS	TRAVEL DEMAND MANAGEMENT ASSUMPTIONS	DEVELOPMENT ASSUMPTIONS
No-Build	<u>Local</u> - 1984 Roadway System which includes improvements to 34th Avenue/I-494 interchange currently under construction as part of I-494/TH 5 interchange project. See Figure 3.11 page 3-19 of DEIS. <u>Regional</u> - Assumes adequate capacity exists.	No travel demand management See Table 6.2, page 6-4 of DEIS for assumed travel demand characteristics.	1.1 million sq. ft. of office 600 hotel rooms 600 residential dwelling units 6,200 additional parking spaces
Build - 1990A	<u>Local</u> - 1984 roadway system plus improvements to the 24th Avenue/I-494 interchange as shown in Figure 5.4 page 5-16 of DEIS. <u>Regional</u> - Assumes completion of portions of 2000 regional roadway system affecting Airport South District.	No travel demand management. See Table 6.2, page 6-4 of DEIS for assumed travel demand characteristics.	See Table 3.2 and 3.3 of DEIS for 1990 development assumptions. 11,600 additional parking spaces
Build - 1990B	<u>Local</u> - Build 1990A roadway system plus improvements to TH 77 with an interchange at Killebrew Drive and an underpass at E. 79th Street as shown in Figure 5.5 page 5-17 of DEIS. <u>Regional</u> - Same as Build 1990A.	No travel demand management. See Table 6.2, page 6-4 of DEIS for assumed travel demand characteristics.	See Table 3.2 and 3.3 of DEIS for 1990 development assumptions. 11,600 additional parking spaces
Build 1995	<u>Local</u> - Same as Build-1990B <u>Regional</u> - Same as Build-1990A	Moderate travel demand management See Table 6.2, page 6-4 of DEIS for assumed travel demand characteristics. See Section 7.1.2 of DEIS for TDM strategies.	See Table 3.2 and 3.3. of DEIS for 1995 development assumptions. 19,100 additional parking spaces
Build 2000	<u>Local</u> - Same as Build-1990B <u>Regional</u> - Same as Build-1990A	Moderate travel demand management. See Table 6.2, page 6-4 of DEIS for assumed travel demand characteristics. See Section 7.1.2 of DEIS for TDM strategies.	See Table 3.2 and 3.3 of DEIS for 2000 development assumptions. 29,850 additional parking spaces

TABLE 2.3
TRANSPORTATION AND AIR QUALITY IMPACT SUMMARY

ANALYSIS ALTERNATIVES	TRAFFIC IMPACTS	AIR QUALITY IMPACTS
No-Build	<u>Local</u> - Following intersections will operate at less than level of service D based on least travel time paths. - 24th Avenue/I-494 N. Ramp Int. in P.M. peak hour - Killebrew Drive/TH 77 Int. in A.M. and P.M. peak hour No problems are expected if 24th Avenue/I-494 interchange, 34th Avenue/I-494 interchange, and TH 77/Killebrew Drive intersection act as a single unit in serving traffic generated by site. <u>Regional</u> - None - See Table 6.8 and Figure 7.1	<u>Within Study Area</u> - No violations of state ambient air quality standards expected. See Tables 6.14, 6.15, 6.16 of DEIS. <u>Regional</u> - No violations expected. See Table 6.13 of DEIS.
Build - 1990A	<u>Local</u> - Following intersections are forecast to operate at less than level of service D. - 34th Avenue/E. 80th Street intersection in P.M. peak hour - 24th Avenue/E. 79th Street intersection in P.M. peak hour - Killebrew Drive/TH 77 intersection in A.M. and P.M. peak hours - E.O.S.R./Killebrew Drive intersection in P.M. peak hour <u>Regional</u> - None. See Figure 7.1	<u>Within Study Area</u> - No violations of state ambient air quality standards expected. See Tables 6.14, 6.15, 6.16 of DEIS. <u>Regional</u> - No violations expected. See Table 6.13 of DEIS.
Build - 1990B	<u>Local</u> - None. <u>Regional</u> - None. See Figure 7.1	<u>Within Study Area</u> - No violations of state ambient air quality standards expected. See Tables 6.10, 6.11, 6.12 of DEIS. <u>Regional</u> - No violations expected. See table 6.13 of DEIS.
Build 1995	<u>Local</u> - None. <u>Regional</u> - See Figure 7.1	<u>Within Study Area</u> - No violations of state ambient air quality standards expected. See Tables 6.10, 6.11, 6.12 of DEIS. <u>Regional</u> - No violations expected. See Table 6.13 of DEIS.
Build 2000	<u>Local</u> - Following intersections forecast to operate at less than level of service D - 34th Avenue/E. 80th Street intersection in P.M. peak hour. - 24th Avenue/E. 79th Street intersection in the A.M. and P.M. peak hour. - 24th Avenue/E. 80th Street intersection in the A.M. peak hour. - E.O.S.R./Killebrew Drive intersection in A.M. and P.M. peak hours. <u>Regional</u> - See Table 6.8 and Figure 7.1	<u>Within Study Area</u> - No violations of state ambient air quality standards expected. See Tables 6.10, 6.11, 6.12. <u>Regional</u> - No violations expected. See Table 6.13 of DEIS.

2.2.2 TRAFFIC MITIGATION MEASURES

Several intersections on the local roadway system were forecast to operate at less than level of service D under the Build-1990A alternative and under the Build 2000 alternative. The air quality analysis for these alternatives was based on the low levels of service and congestion which were forecast at these intersections, and no violations of state ambient air quality standards are forecast even with these reduced levels of service. The low levels of service and congestion forecast on the local intersections under the Build 1990A alternative would all be alleviated with the construction of the proposed improvements to TH 77 between East 86th Street and I-494. The reason for this is that without an interchange at TH 77 and Killebrew Drive traffic conditions at the Killebrew Drive/TH 77 intersection will force traffic to use the other three interchanges serving the Airport South District creating higher traffic volumes and turning movements at the identified intersections than would occur if the improvements proposed for TH 77 were in place.

The low levels of service forecast at the local intersections under the Build 2000 alternative could be mitigated by intersection geometric improvements such as the addition of right and/or left turn lanes and in the case of 24th Avenue the addition of a through lane in each direction from south of East 80th Street to the ramp intersection south of I-494. The type of and need for geometric improvements at the identified intersections will depend largely on the timing and location of development in the Airport South District, the construction of improvements at other key intersections and the success of travel demand management in the Airport South District.

Geometric improvements to the 34th Avenue/East 80th Street intersection have been identified which would raise the forecast year 2000 level of service at this intersection to an acceptable standard. The proposed geometrics are shown in Figure 7.2 of the DEIS.

The forecast year 2000 level of service at the East Old Shakopee Road/Killebrew Drive intersection could be raised to an acceptable standard by adding right-turn lanes to the north and south approaches to this intersection and allowing double left-turns from westbound Old Shakopee Road to southbound Old Shakopee Road.

The type of improvements required on 24th Avenue between East 80th Street and the ramp intersection south of I-494 will depend on whether or not the 79th-80th Street connection is constructed as shown in Figure 5.7 and on whether or not the City is able to implement the planned connections from the metropolitan stadium site to East 79th Street across the Metropolitan Sports Center property. If these other connections are not made acceptable levels of service could be achieved at the East 80th Street and East 79th Street intersections with 24th Avenue by adding an additional through lane in each direction to 24th Avenue from south of East 80th Street to the ramp intersection south of I-494; allowing double lefts on the north approach to the East 80th Street and 24th Avenue intersection; providing a left-turn lane on the north approach to the East 79th Street and 24th Avenue intersection; and widening the east and west approaches to the E. 79th Street and 24th Avenue intersection to three lanes.

Because of the speculative nature of the assumptions which were used to forecast traffic volumes at these locations; the fact that the forecast conditions are not expected to occur until after 1995; and the fact that if they did occur they are not expected to result in violations of state ambient air quality standards, it is recommended that the final determination on the need for and design of improvements at these identified intersections be based on data collected in the monitoring program.

2.2.3 FUNDING OF TRANSPORTATION IMPROVEMENTS

The transportation analysis for the Airport South District indicated the need for two major roadway improvement projects in order to serve the development projected for the Airport South District through the year 2000. One of these projects is the upgrading of the 24th Avenue/I-494 interchange. Analyses of traffic and air quality expected with the 1990 development (which would involve the construction of 11,600 parking spaces), indicate that the 1990 development can be supported with existing improvements to the 34th Avenue/I-494 interchange and the planned improvements to the 24th Avenue/I-494 interchange. The proposed TH 77/Killebrew Drive interchange is not necessary to support the projected 1990 development. Development should be limited to the 6,200 additional parking spaces analyzed under the no-build alternative until the Phase I 24th Avenue/I-494 improvements are under contract.

This \$4.2 million project is on Hennepin County's Capital Improvement Program (CIP) for 1985 and the anticipated source of funds for the proposed first stage improvements shown in Figure 5.4 page 5-15 of the DEIS, are derived from federal aid urban, county state aid and City of Bloomington allocations. However, approved funding for this project is not expected until October of 1984 when the board approves the 1985 CIP.

The other major improvement is the upgrading of TH 77 between East 86th Street and I-494 which includes an interchange at Killebrew Drive and an underpass at East 79th Street. Construction of these improvements are expected to begin between 1987 and 1992. Although the improvements are not required to support 1990 development levels they are required for continued development of the Airport South District to projected year 2000 levels. Analyses of traffic and air quality indicate that development through the year 2000, including the construction of 18,250 associated parking spaces, can be supported provided that the TH 77/Killebrew Drive improvements are completed and a travel demand management plan is implemented which would achieve the moderate level of travel demand management goals outlined in the DEIS.

This \$19 million project does not presently have a committed source of funding. The City of Bloomington is working with the Minnesota Department of Transportation (Mn/DOT) on preparing preliminary and final engineering plans for the project as well as completing the required federal environmental review. Mn/DOT has appointed a project manager to oversee the project. It is expected that the preliminary engineering and the required federal environmental review will be completed in 1985 and final engineering can begin in 1986. The funding commitments for these improvements will be worked out during this preliminary and final design process. Development beyond 1990 should be tied to this improvement.

Roadway improvement projects that are solely within the City of Bloomington jurisdiction such as the roads on the stadium site will be funded through tax increment financing. Tax increment financing will also be used to fund the City's share of TH 77 improvement costs.

2.2.4 MONITORING PROGRAM

Because of the uncertain nature of the assumptions used to predict traffic and air quality impacts there is a need to monitor development and traffic as the Airport South District is developed. The DEIS outlines the various elements which should be monitored and reported in an annual report. The City of Bloomington will be responsible for implementation of this monitoring program and preparing the annual report. The monitoring report will evaluate the consistency of the monitored conditions with the forecasting assumptions used in the DEIS analysis. The evaluation of the monitoring elements described in the DEIS will allow identification of transportation deficiencies and the need for additional roadway improvements and assess the effectiveness of travel demand management strategies. If major inconsistencies are identified it would be the City of Bloomington's responsibility to develop a plan to resolve the inconsistencies. This plan may include one or more of the following actions.

1. Implement modified transit incentives.
2. Implement modified rideshare incentives.
3. Implement additional roadway improvements.
4. Limit development.

The monitoring elements identified in the DEIS will help in identifying the most cost effective mitigation measures.

2.3 NOISE

A layout showing the possible barrier locations, receiver sites, and areas for potential land use conversion is shown in Figure 2.1.

Additional analysis of barrier heights needed to attain the nighttime standard on the west side of TH 77 has been completed. This analysis considered peak nighttime (6:00 to 7:00 AM) traffic volumes and yielded the following results.

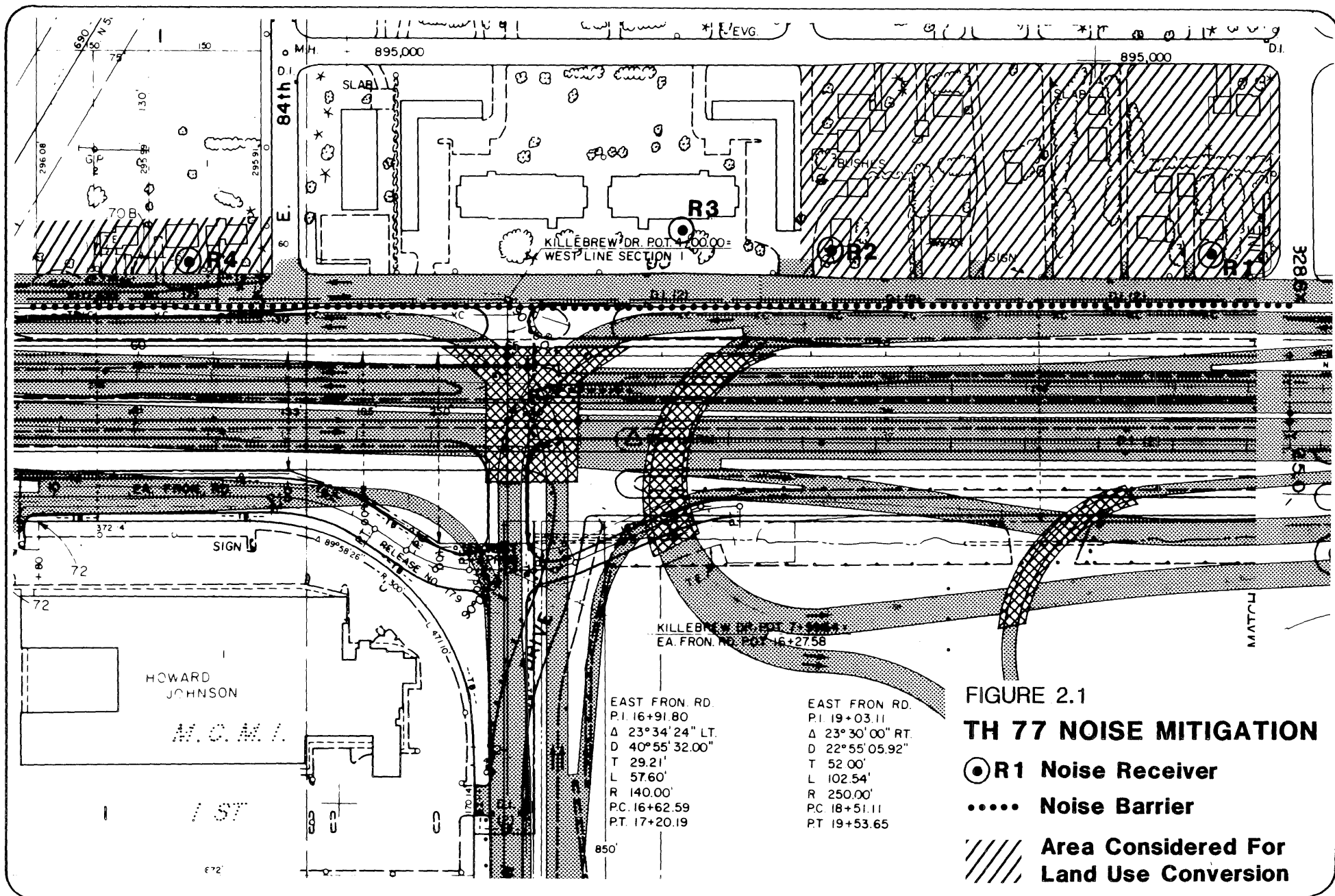


FIGURE 2.1
TH 77 NOISE MITIGATION
 ● R1 Noise Receiver
 Noise Barrier
 // Area Considered For Land Use Conversion

BARRIER ATTENUATION
TH 77 AT KILLEBREW
PEAK NIGHTTIME NOISE LEVELS (dBA)

	Barrier Height (feet)							
	0		14		25		40	
Receiver	L ₁₀	L ₅₀	L ₁₀	L ₅₀	L ₁₀	L ₅₀	L ₁₀	L ₅₀
R1	72.4	66.1	64.4	57.2	59.6	49.5	58.0	47.2
R2	71.1	64.2	65.1	57.8	59.8	49.6	58.2	47.1
R3	67.8	62.3	63.1	57.0	58.6	49.7	56.7	46.7
R4	67.2	60.6	62.2	53.4	58.4	47.7	57.4	46.1
State Nighttime Standards					L ₁₀	55 dBA		
					L ₅₀	50 dBA		

The results of the analysis indicate that even a 40 foot high barrier would not result in attainment of the nighttime L₁₀ standard. The nighttime L₅₀ standard can be attained with a 25 foot barrier. As stated in the DEIS, a 14 foot barrier is sufficient to attain the daytime noise standards.

Based on a unit price of \$12 per square foot and a barrier length of approximately 1,700 feet, the following noise barrier costs have been estimated.

NOISE BARRIER COSTS

Height (feet)	Cost (\$)
14	\$285,600
25	\$510,000
40	\$816,000

It should also be noted that the cost per square foot of noise barrier will increase with increasing barrier height due to the additional structure needed to support a higher wall. Thus, the cost difference between the different barrier heights would be greater than those shown.

2.4 WATER QUALITY

2.4.1 IMPACTS

The DEIS contains a comprehensive analysis of the potential water quality impacts associated with the future development in the Airport South District. The major findings of this analysis are that:

- The volume of stormwater runoff entering Long Meadow Lake between the Cedar Avenue bridge and the I-494 bridge could increase approximately six percent.

- Loadings of nutrients, total suspended solids, and chlorides could increase by approximately five percent, 20 percent, and 15 percent respectively; unless additional treatment measures are provided.
- Loadings of oil and grease to Long Meadow Lake could increase by up to 80 percent if retention basin overflow spillways discharge stormwater regularly.
- During construction, loading of nutrients and suspended solids to Long Meadow Lake could more than double unless adequate sediment-erosion control measures are employed and maintained during the construction period.

However, it should be noted that these conclusions assume no mitigation and are based on an analysis that only considers impacts due to future development in the Airport South District.

There are 10 stormwater outfalls that currently discharge into Long Meadow Lake. Six of the stormwater outfalls discharging into Long Meadow Lake are located to the southwest of the TH 77 bridge outside of the study area. At one time all of the stormwater outfalls discharged directly to Long Meadow Lake without benefit of treatment. When Mn/DOT upgraded TH 77, they constructed the retention basin identified as Pond C to handle stormwater runoff from the watershed shown in Figure 6.27 of the DEIS. This pond now intercepts stormwater outfalls that previously discharged directly to Long Meadow Lake, one of which discharged runoff from a major portion of the Airport South District.

Presently, the City of Bloomington is constructing another storm sewer system that will direct runoff from a portion of the Airport South District to a retention and treatment basin identified as Pond 1. See Figure 6.28 of DEIS. Although it is believed that these two retention ponds will have a positive impact on the water quality of Long Meadow Lake there has not been a good baseline study completed of Long Meadow Lake to identify the effects of these retention basins.

It should also be noted that the analysis was based on conservative assumptions. In modeling the impacts on Long Meadow Lake, runoff from the identified watersheds was considered as the only source of pollutant loadings to Long Meadow Lake. As previously mentioned there are six other stormwater outfalls, outside the Airport South that enter Long Meadow Lake, and therefore the above assumption results in an overstatement of the impacts from this project.

In the case of pollutant loadings during construction the analysis assumed minimal erosion control measures. Table 6.29 of the DEIS was revised to show the expected pollutant loadings during construction if recommended erosion control measures were employed, (see Table 2.4). Section 7.4 of the DEIS identifies potential construction site erosion and sediment control measures.

TABLE 2.4
TOTAL ANNUAL LOADINGS TO LONG MEADOW LAKE
FROM AIRPORT SOUTH DISTRICT WATERSHEDS

	Existing	Under Construction with Minimal Erosion Control	Under Construction with Extensive Erosion Control	Fully Developed
<u>Total Suspended Solids (kg/yr)</u>				
Pond C	153,713	213,022	192,141	178,912
Old Shakopee Road	18,292	37,955	22,865	19,861
Bluffs	76,909	228,219	135,000	90,793
80th Street	7,900	16,407	13,400	11,850
Pond 1	--	--	--	4,434
Total	256,814	495,603	363,406	305,850
<u>Total Phosphorus (kg/yr)</u>				
Pond C	730	930	760	745
Old Shakopee Road	35	76	44	37
Bluffs	160	319	175	158
80th Street	15	33	23	19
Pond 1	--	--	--	26
Total	940	1,358	1,002	985
<u>Total Kjeldahl Nitrogen (kg/yr)</u>				
Pond C	3,750	4,500	4,100	3,824
Old Shakopee Road	136	271	160	141
Bluffs	570	1,141	700	569
80th Street	59	117	85	74
Pond 1	--	--	--	129
Total	4,515	6,029	5,045	4,737
<u>Chloride (kg/yr)*</u>				
Pond C	110,986	116,000	116,000	121,273
Old Shakopee Road	3,800	4,200	4,200	4,540
Bluffs	6,845	8,100	8,100	9,078
80th Street	1,640	1,900	1,900	2,370
Pond 1	--	--	--	5,113
Total	123,271	130,200	130,200	142,374
<u>Oil and Grease (kg/yr)*</u>				
Pond C	3,409	4,100	4,100	5,216
Old Shakopee Road	325	440	440	567
Bluffs	228	350	350	454
80th Street	140	210	210	296
Pond 1	--	--	--	325
Total	4,102	5,100	5,100	6,858

* Loadings of chloride and oil and greases are typically a function of the parking lot and roadway area that is in use within the watershed. For this reason, erosion control measures during construction have little effect on the loading of these pollutants.

The water quality classification of Long Meadow Lake is fisheries and recreation Class B. Based on a Pond C water quality analysis performed by the Minnesota Department of Transportation, stormwater runoff into Long Meadow Lake from the Airport South District should typically meet or be better than the state instream water quality standards. Since these standards were established to protect fish and wildlife the development in the Airport South District should not affect water quality in Long Meadow Lake so as to have an adverse impact on fish and wildlife.

2.4.2 EFFICIENCY, EVALUATION, STORMWATER RUNOFF TREATMENT SYSTEMS

Removal efficiencies for Pond C were calculated based on the modeled influent concentrations to Pond C; calculated retention times and settling rates; and Mn/DOT monitoring data of pollutant discharges from Pond C. Retention times were calculated assuming 25 acre-feet of storage in Pond C. (This is the storage capacity below the controlled volume outfall). It should be noted that Pond C actually has 153 acre-feet of storage below the overflow spillway and therefore actual retention times are greater than those assumed for this analysis.

Removal efficiencies for Pond 1 were determined based on removal rates for other similar wetland treatment systems. The primary source of data was from the Lake Josephine Wetland Treatment System in Roseville for which three years of monitoring data is available. The Lake Josephine wetland treatment system has a similar sized storage pond and associated marsh and drains a similar area as the stadium area Pond 1 treatment system.

2.4.3 WATER QUALITY MITIGATION MEASURES

The water quality mitigation section of the DEIS (Section 7.4) identified several alternatives for off-site treatment of stormwater runoff to Long Meadow Lake. The alternatives included:

- Connecting Pond C with Pond 1 to improve the overall system removal efficiency.
- Diverting stormwater runoff to Long Meadow Lake and discharging it directly to the Minnesota River.
- Increasing the capacity of the Mn/DOT retention basin identified as Pond "C".
- Constructing skimmers at pond overflow structures.
- Constructing sedimentation and treatment basins for stormwater runoff from the Old Shakopee Road and 80th Street outfalls.

Based on the analysis of these alternatives the DEIS concluded that a combined Pond C-Pond 1 treatment system, if properly designed, would increase the system's overall removal efficiency and would more than off-set the increased loadings of nutrients, solids and oil and grease resulting from additional development in the Airport South District. Therefore, the DEIS recommended a combined Pond 1-Pond C treatment system as the most cost-effective mitigation measure.

Given the relative sizes of Pond C and Pond 1 and the relative discharges and retention times for these ponds there is little doubt as to the benefits of a combined Pond C-Pond 1 treatment system. However an exact quantitative analysis of removal efficiencies cannot be made for a combined Pond C-Pond 1 system until the final design is completed. Additional study is recommended to determine the most cost effective way of combining the two ponds. Some of the alternatives for a combined Pond C-Pond 1 treatment system include but are not limited to the following:

- Divert runoff from the 72 inch pipe entering Pond C into Pond 1.
- Reduce the discharge from Pond C to utilize more of the storage capacity available between the weir elevation and the overflow spillway elevation. The additional runoff from higher intensity less frequent rainfall events could be diverted to Pond 1 through the control structures in the stadium area storm sewer system.
- Divert more of the runoff from the stadium area or 22nd Avenue watershed to Pond 1 through the control structures in the stadium area storm sewer system.
- Connect Pond C with Pond 1 with a short storm sewer between the two ponds.

The diversion of stormwater runoff from the Airport South District directly to the Minnesota River would involve fairly significant construction costs and would also have potential environmental impacts associated with the construction. There are two potential alternatives for implementing this alternative. One alternative would involve approximately one mile of construction proceeding southeast across Long Meadow Lake and the adjacent wetlands to the Minnesota River. The other alternative would involve construction along the base of the bluff towards the 80th Street outfall. This would also involve approximately one-mile of new storm sewer. The benefits of this diversion may be limited by the fact that these alternatives would at most divert stormwater from only 4 of the 15 stormwater outfalls to Long Meadow Lake.

The capacity of Mn/DOT Pond C could be increased by enlarging the pond area to the north. However, this would require additional excavation and tree removal. The effectiveness of Pond C may also be increased by diverting some of the discharge to Pond 1.

Construction of skimmers at pond overflow structures would be effective in removing oil and grease if properly maintained and are recommended for both Pond C and Pond 1.

Construction of treatment basins for the Old Shakopee Road and 80th Street outfalls would be relatively costly and would not significantly affect pollutant loadings to Long Meadow Lake. These two watersheds account for only 10 percent of the total suspended solids, six percent of the total phosphorous, 4.5 percent of the total kjeldahl nitrogen, and five percent of the total chloride loadings from the Airport South District to Long Meadow Lake. Their percent of the total outfall loadings from all areas to Long Meadow Lake is even less. The 80th Street outfall does not discharge directly into Long Meadow Lake but instead discharges into a slough which carries water from Long Meadow Lake to the Minnesota River.

It would be very difficult and expensive to build treatment basins for these outfalls and they would be very limited in size due to the topography around these outfalls. Since the efficiency of the treatment basin is dependent on the size of the treatment basin it is likely that a very small percentage of the loadings would be removed. Revision of these outfalls is most likely when the Fish and Wildlife Service completes acquisition of this portion of the River Valley and is able to work with the City to locate a new treatment pond or reroute the outfalls to bypass Long Meadow Lake.

2.5 GROUNDWATER

2.5.1 POTENTIAL IMPACTS OF PERMANENT DEWATERING OF PROPOSED KILLEBREW DRIVE/TH 77 INTERCHANGE

TH 77 was rebuilt in 1979 from Killebrew Drive south to I-35E. This construction included the construction of a new six lane bridge over the Minnesota River. At East 86th Street, TH 77 was lowered to pass under the East 86th Street bridge. The low point on TH 77 at East 86th Street is at approximately elevation 804. The bottom of the subgrade is at approximately elevation 799. From East 86th Street to the north, TH 77 rises at a 1.1 percent grade and at the intersection with Killebrew Drive, TH 77 is at approximately elevation 821. A 6-inch perforated drain pipe runs parallel to both sides of TH 77 from approximately 400 feet north of East 86th Street to the south of East Old Shakopee Road, where it empties into the storm sewer and eventually into Mn/DOT Pond C. The purpose of the perforated drain pipe is to collect groundwater in order to keep the road and subgrade dry.

A permanent dewatering system in the vicinity of the proposed TH 77/Killebrew Drive interchange would probably consist of extending the perforated drain pipe through the proposed interchange. Preliminary analysis indicates that the low point on TH 77 in the project area will also be at approximately elevation 804 with the bottom of the subgrade at approximately elevation 799. The complete design of this system will be completed as part of the preliminary engineering for the TH 77/Killebrew Drive interchange.

The groundwater analysis in the DEIS indicated that the groundwater levels in the surficial drift in the area of the proposed interchange ranged from 797 to 804. The elevation of the highest spring in the ravine is at elevation 789. The groundwater data collected indicated that there was not a strong gradient toward the bluffs except near to them and that most of the groundwater in this area was moving vertically downward to deeper aquifers. Therefore, it was concluded that if the dewatering system in the area of Killebrew Drive controlled water elevations in the range of elevation 798 they would not affect the springs in the ravine near 24th Street. However, development adjacent to the bluff could potentially affect the flow to the springs by increasing the amount of impervious surface and decreasing the amount of infiltration. One way of mitigating this potential impact is to require development adjacent to the bluff to use infiltration systems which reduce surface runoff and increase the recharge of groundwater. This is discussed in Section 7.4.2 on pages 7-33 and 7-34 of the DEIS.

2.6 VEGETATION AND WILDLIFE

2.6.1 VEGETATION IMPACTS

The DEIS conclusion that the impacts were insignificant was based on placing the impacts in a regional perspective. A comparison was made on a regional basis in that the Metropolitan Council adopted regional development guidelines wherein development is encouraged in areas provided with public utilities and services and discouraged in areas lacking those services. Furthermore, these guidelines recognize the positive value and appropriateness of public parks and open space and have designated certain areas for open space and park preservation purposes. This metropolitan area development policy was developed over several years with extensive input from local communities to achieve a balance between orderly development and the preservation of open space values. These policies were developed at a time when the Minnesota Valley Refuge and Recreation Area had been established. The Metropolitan Council has indicated that the development of the Airport South Development District is consistent with the Metropolitan Development Framework.

The seven county metropolitan area has a sizeable woodland resource base including 34,200 acres of maple-basswood woodland, 25,700 acres of oak-hickory, and 14,500 acres of aspen-birch (1980 data from Minnesota DNR and other sources). In addition, there are 12,900 acres of elm-ash-cottonwood. There are also approximately 95,000 acres of public land for which forest cover data is not available. The worst case loss of 88.2 acres of woodland vegetation taken in a regional context amounts to approximately .1 percent of the total woodland in the metropolitan area excluding the elm-ash-cottonwood type.

Nearly a tenth of Bloomington's land area (24,580 acres) has woodland vegetative cover. The largest single component is upland woodland along the Minnesota River bluff and in the regional park reserve which totals approximately 1,200 acres. Fragmented sections of upland-woodland also occur in large lot residential areas. While the largest continuous tract

of upland woodland in a residential area is less than 40 acres, the aggregate of all these areas is approximately 600 acres. Lowland woodland in the Minnesota River floodplain and the floodplain of Nine-Mile Creek is approximately 600 acres in total. It is estimated that over 90 percent of these woodlands will be preserved through a variety of public and private decisions.

The loss of old growth deciduous upland forest in the Airport South Development District is significant under the assumptions of the worst case analysis performed for Alternative 1. The significance of this loss is related to the need for providing a buffer or transition zone between the publicly owned undeveloped natural habitat of the Valley Refuge and the private holdings with development potential on the bluff top. Presently, this buffer consists of old growth deciduous upland woodland (hillside forest) old field, brushland and some residential development. The development concepts identified in the DEIS would result in changes in the character of this buffer zone.

In particular, concerns were raised regarding the loss of old field, brushland and old growth deciduous upland forest and the impact the loss of this habitat would have on white-tailed deer and the pileated woodpecker. One of the objects of the generic EIS process is to identify adverse impacts so that these can later be avoided or appropriately mitigated as specific development proposals are considered and evaluated.

In the habitat loss analysis, a worst case analysis was performed. Since specific development proposals were not available for all parcels (and in fact development proposals could change even on those parcels where plans had been submitted) the decision was made to analyze habitat loss on the basis of the worst possible case (i.e., 100 percent building site coverage). Therefore, for all parcels cumulatively, the impacts of development to the 760-foot elevation contour represent a condition which is not likely to occur.

Under "worst case" conditions significant adverse impacts would occur to the old field, brushland and old growth deciduous upland vegetation types. Loss of brushland habitat amounts to 0.3 acre. This is 3.6 percent of the total brushland habitat in the District (8.4 acres). This 0.3 acre is on Parcel E which is owned by the U.S. Fish and Wildlife Service and lies between the 760 and 800 foot elevation contour. No other brushland habitat occurs on any other parcels as shown in Table 6-37 of the DEIS. Whether this brushland habitat will be lost or impacted will depend upon the site development proposal implemented by the Fish and Wildlife Service.

Old field habitat will be significantly reduced. However, 74.5 acres of the old field type is above the 800 foot elevation contour and consists of areas previously cultivated or graded but not yet developed. Three of these fields are over 1,100 feet from the bluff top and separated from it by development. Table 2.5 is a summary of the grassland impacts including old fields, open pasture and lowland meadows. The net difference between Alternatives 1 and 2 is a 2.4 acre loss of old field vegetation and a 3.8 acre loss of open pasture. Two acres of the old field cover type are on Parcel E, the Fish and Wildlife Service Headquarters site, and occur between the 760 foot and 800 foot elevation contours. The impacts on these

Table 2.5

Selected Vegetation Impacts Summary

	<u>Old Field</u>	<u>Open Pasture</u>	<u>Lowland Meadows</u>	<u>Old Growth Deciduous Upland Forest</u>	<u>Mature Deciduous Riparian Forest</u>
Above 800'	74.5	24.8	-	57.2	-
760'-800'	2.4	3.8	-	31.0	-
Below 760'	9.0	4.7	17.6	92.4	436.2
Total Existing	85.9	33.3	17.6	180.6	436.2
Potential Loss					
Alternative 1	76.9	28.6	-	88.2	-
Alternative 2	74.5	24.8	-	57.2	-
Net Difference	2.4	3.8	-	31.0	-
Total Remaining					
Alternative 1	9.0	4.7	17.6	92.4	436.2
Alternative 2	11.4	8.5	17.6	123.4	436.2

two acres will be dependent on the final site development plan implemented by the Fish and Wildlife Service.

Comments received from the U.S. Fish and Wildlife Service and the Department of Natural Resources stated that a loss of up to 32 percent of the hillside bluff forest (old growth deciduous upland forest) in the Airport South District would result in a significant adverse impact. The EIS for the Minnesota Valley National Wildlife Refuge indicated that 307.8 acres of hillside forest are protected by refuge status of which 6.4 acres are in the Airport South District. This statistic does not reflect the total amount of hillside forest present since refuge acquisition, with some exceptions, is generally limited to land below the 720 foot contour. The upland hillside woodland generally occurs between the 720 foot contour and the top of the bluff. The other participants in the Refuge-Recreation Area Management Program (State of Minnesota and local government units) also provide protection generally up to the 720 foot contour. Consequently, the hillside woodland is vulnerable to development.

2.6.2 WHITE-TAILED DEER IMPACTS

Information received from the Fish and Wildlife Service and the Department of Natural Resources during the DEIS preparation did not identify the critical nature of the old growth deciduous upland forest as winter deer habitat. The Fish and Wildlife Service in commenting on the Scoping Document noted that the wintering deer herd is dependent on the bluff for winter food and cover and that development could impact the deer herd in the valley. The term "valley" was interpreted to include the entire Refuge and Recreation Area from Fort Snelling to Jordan. In particular, no distinction or specification was made that a discretely definable winter deer yard existed in the study area and that the Airport South Development District encompassed a part of that deer yard.

The Minnesota Department of Natural Resources comments on the scoping document also did not indicate the importance of the study area as a winter deer yard. In commenting on the Vegetation and Wildlife Technical Report prepared for the DEIS, the DNR commented that "Development of bluff-face woodlands eliminates habitat used by deer when they are forced from the floodplain because of high water." In a meeting held March 5, 1984 with representatives of the Refuge and the DNR to discuss wildlife issues, no mention was made that the bluff face constituted a critical component of the winter habitat of deer located in that part or any other part of the valley.

As a result of these discussions and because there are no published reports describing winter deer movements and use of the Minnesota Valley, it was concluded that the deer population was relatively mobile, and that the 436.2 acres of mature riparian forest and 123.2 to 154.2 acres of old growth deciduous upland forest remaining would provide habitat to maintain the population at close to current levels. In addition, other habitat would continue to be available in Fort Snelling State Park and in other parts of the Refuge and Recreation Area.

In the broader sense, white-tailed deer are not a species in jeopardy of extinction and in fact, as pointed out by the Department of Natural Resources in their DEIS letter of comment, have exceeded the carrying capacity of the habitat in this location. The population level is being sustained by artificial feeding and a population management plan is being implemented. Deer populations which exceed the carrying capacity of their habitat have the potential for destroying not only natural plants but ornamental shrubbery as well. Several reports of deer damage to shrubs were received in connection with this study. Potential conflicts between management of the deer herd on the Refuge and damages to private property are likely to occur in the future.

Subsequent to the preparation of the DEIS, additional data has been collected and analyzed regarding winter deer use of the area which suggests the upland hillside woodland is a critical component of the winter deer habitat. There is evidence suggesting that this deer yard is important on a regional basis with deer traveling up to 50 miles or more to winter at this location. Continued existence of the wintering area is important but potential problems are inherent particularly if development is permitted to occur to the 760-foot contour elevation. A research investigation by both agencies is continuing and no published information is available which conclusively documents the winter ecology of white-tailed deer in the Minnesota Valley.

Any loss of woodland habitat along the bluff would likely have some impact on this specific population of wintering deer. However, quantification of the impacts in terms of carrying capacity reduction as requested by the Friends of the Valley in their DEIS comments is not possible. As previously indicated, this particular area is already experiencing an overpopulation of deer, and these deer are being partially supported in this habitat by an artificial feeding program.

The preparation of a deer management plan is beyond the scope of the EIS process. The management of the deer herd within the City of Bloomington and specifically within the Airport South District is the responsibility of three agencies; the U.S. Fish and Wildlife Service, the Minnesota Department of Natural Resources and the City of Bloomington. Management of the deer population can be accomplished through a cooperative effort involving the three agencies. The City has participated in cooperative planning efforts with the DNR and USFWS in past projects.

The responsibilities of the DNR and USFWS would include determining the purpose for the management of the deer herd in the Minnesota Valley (i.e., hunting, visual observation); the function and distribution of valley habitat (winter yard, summer range, regional movement corridor); the natural carrying capacity of the habitat; a desirable population level (summer and/or winter); whether this population level is consistent with habitat condition; the need for and desirability of maintaining the population above the carrying capacity; the implications of the long term maintenance of the deer herd at the desired population level; the desirability and practicability of hunting as a long-term population management tool; alternatives for maintaining the population at the desired level and how the management program will be implemented.

The City of Bloomington would be responsible for those aspects of the management program for which it has local authority (e.g., a firearms ordinance and the implementation of an ordinance regulating deer feeding). In this consideration, it must keep in mind its responsibility for protecting the health, safety, and well-being of the residents of the City and the possible hazards associated with deer hunting in the Minnesota Valley in Bloomington.

Winter deer movement would be adversely affected under Alternative 1 if grading were to occur down to the 720 foot elevation contour. Assuming that development and grading were not permitted below the 760 foot elevation contour, at only one location on the Kelley property would the deer movement corridor be restricted to 200 feet in width. Elsewhere, the travel corridor would be several hundred feet in width. This corridor would be available even during the 100-year flood, the elevation of which is 722 feet. During the rest of the year a wider travel corridor would be available.

Deep snow in the valley bottom which might hinder deer movement should generally not be a problem. Data in Table 2.6 indicate that the median snow depths for the Minneapolis-St. Paul Airport are generally less than 8 inches for most of the winter. Snow depths which severely impede deer movement are in excess of 18 inches. The severe weather during the past two winters does not represent normal weather patterns of this area and are not likely to occur on a regular basis. During severe winters with snow depths in the valley bottom exceeding 18 inches for prolonged periods, it is possible that development to the 760 foot elevation contour could restrict deer movement and have an adverse effect on the population.

To ensure that encroachments on the deer travel corridor will not occur, the City of Bloomington should review site development plans, and take all measures possible to protect to the extent possible, woodland travel corridors for deer along the face of the bluff. Where removal of tree cover is necessary, revegetation, utilizing tree species recommended in the Bluff Report District Plan, should be required at a density of 120 trees per acre including at least three of the seven species recommended in the Bluff Report District Plan.

2.6 3 BALD EAGLES

In four years of reported eagle observations, including 35 immature and adult birds, only one observation was documented near the Airport South Development District. This observation occurred in 1978 at the edge of Long Meadow Lake at approximately the 700-foot contour elevation. Three other eagle observations have been made in the vicinity of Long Meadow Lake but these have been across the river from the District. Two eagle observations made in April of 1982 were generally reported as occurring on Long Meadow Lake, but specific location details were not available.

Bald eagles have also been observed in other Twin Cities Metropolitan Area locations. Generally, these observations have occurred during the spring migration period in March. Reports of bald eagles wintering on the St. Croix River near Stillwater close to residentially developed areas along the river bank have also been made.

Table 2.6 Median Snow Depths at 10-Day Intervals, 1959-1979,
Minneapolis-St. Paul Airport

<u>Date</u>	<u>Snow Depth (inches)</u>
November	0
December 10	3
20	3
25	3
31	3
January 10	7
20	8
31	7
February 10	7
20	8
28	6
March 10	6
20	3
31	0
April	0

Source: Climate of Minnesota. Part 13. Duration and depth
of snow cover.

The bald eagle observations recorded at the Black Dog Power Plant are within a few hundred feet of the main plant and a major subdivision on the south side of the river. The eagles have been observed roosting, soaring and feeding on dead fish. Generally, these observations are reported from areas adjacent to open water where the eagles scavenge and feed on dead or dying fish. Similar habitat conditions on Long Meadow Lake would be 1,000 or more feet from any of the parcels proposed for development under Alternative 1. Therefore, it was concluded that Alternatives 1 or 2 would not have an adverse impact on either wintering or migratory bald eagles.

The Fish and Wildlife Service, in their EIS for the Minnesota Valley National Wildlife Refuge, concluded that the opportunity to manage the bald eagles as a rare, threatened or endangered species does not present itself on the Refuge. The EIS also concluded that "the limited use of the Refuge by the bald eagle indicates there is no need for special emphasis on the species."

2.6.4 BIRD FLIGHTS

Research has indicated that a great percentage of bird kills occur during periods of low visibility; most often on overcast or foggy nights.^{1/} This same research does not indicate, nor are there any reports in the literature which indicate, that removal of significant numbers of dead birds by scavengers in an urbanized setting is likely.

Efforts were made to obtain other reports describing bird mortality and man-made structures (particularly Avery, M.L., P.F. Springer and N.S. Dailey, 1978, Avian mortality at man-made structures: an annotated bibliography, U.S. Fish And Wildlife Service FWS/OBS-78/58, 108 pp) from a variety of local natural resource libraries including the Fish and Wildlife Service library at Fort Snelling and the Entomology Fisheries and Wildlife Library at the University of Minnesota. This report as well as others which are compilations of the literature were not available.

Information we were able to obtain including a report completed by Dr. Dwain Warner, an ornithologist at the University of Minnesota, for the Mount Normandale Lake project in Bloomington concluded that avian mortality related to building collisions is the result of either night strikes by migratory flights forced close to the ground by conditions of poor visibility or from accidental strikes by local resident birds. Migration strikes are generally unpredictable as to time, place and magnitude of kill. Under conditions of poor visibility migrating birds may strike natural as well as man-made objects. These conditions occur when birds begin a migratory flight in good weather and fly into inclement weather. Migratory flights are not initiated in inclement weather conditions.

1/ Willard, 1978 (pg. 7)(Willard, Daniel E. 1978. The impact of transmission lines on birds and vice versa. In: Avery, Michael L. 1978. Impacts of transmission lines on birds in flight. U.S. Fish and Wildlife Service, Biological Service Program FWS/OBS-78/48. Pp. 3-9.)

The majority of migratory flights occur between 500 and 1,500 feet above the ground. None of the buildings proposed for the Airport South Development District would exceed 15 stories (approximately 150 feet) which is well below the normal flight elevation. Tall buildings immediately adjacent to the bluff edge could be a flight hazard under conditions of poor visibility.

The "wildlife science" practiced by the building superintendents for the Control Data and Appletree Square buildings should not be discredited. The building superintendents are very aware of the wildlife activity around the area particularly after regular work hours and on weekends. If bird strikes were a significant problem and numerous dead birds were found, on a recurring basis, it is quite likely that these individuals, responsible for maintaining the appearance of the building grounds, would be aware of a problem.

RESPONSES TO DEIS COMMENTS



minnesota department of health

717 s.e. delaware st. p.o. box 9441 minneapolis 55440

(612) 623-5000

September 5, 1984

Gregg Downing
Environmental Quality Board
100 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Gregg:

During the scoping process for the environmental impact statement(EIS) on Airport South, the Minnesota Department of Health stated that its primary concern regarded air pollution and its impacts on high-risk segments of the population. After reviewing the Draft EIS, the Health Department has determined the document adequately addresses our concerns.

If you have any questions, please call me at 623-5219.

Sincerely,

Laura Oatman
Environmental Engineer
Section of Health Risk Assessment

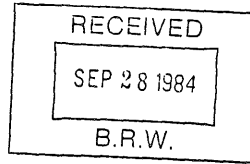
an equal opportunity employer



METROPOLITAN TRANSIT COMMISSION
560-6th Avenue North, Minneapolis, Minnesota 55411-4398 612/349-7400

September 19, 1984

Mr. Greg Downing
Environmental Quality Board
100 Capital Square Building
550 Cedar Street
Saint Paul, Minnesota 55101



RE: Airport South Project: DEIS

Dear Mr. Downing:

The Metropolitan Transit Commission wishes to offer comments on the Draft Environmental Impact Statement prepared for the Airport South project. We have reviewed this DEIS from the standpoint of its treatment of transit as a metropolitan system and as a development tool and mitigating measure.

The MTC wishes to commend the City of Bloomington for its willingness to incorporate transit considerations in this critical pre-development stage. All too often developments are planned and built either to the exclusion of the transit travel option or to its detriment. The Airport South Transportation and Environmental Management Study, in which the MTC was a participant, was innovative in that the transit and rideshare option was built into the project design and transportation system analysis.

It is important to recognize that transit, rideshare and other travel demand management measures outlined in Section 7.1.2 of the DEIS were developed to indicate the magnitude of treatment necessary to meet the project's goals (Section 5) and are not planned or programmed services. The specific strategies that will eventually be employed in the District will depend largely on the type and amount of development, funding, and the state of the art at the various critical timepoints.

It is also important to recognize that the metropolitan system of transit and rideshare is an impacted system as well as an important mitigative tool. Projects such as that being proposed by the City of Bloomington have the potential to create demand for services beyond the financial ability of an implementing entity such as the MTC. The City of Bloomington needs to recognize this financial burden and take necessary actions to mitigate.

The MTC has appreciated the opportunity to participate in the Airport South project, and we look forward to participating in further planning and implementation activities in that area.

Sincerely,

Philip H. Braum
Manager of Transit Development

jd



Minnesota Department of Transportation
Transportation Building, St. Paul, MN 55155



Phone (612) 296-1652

September 5, 1984

Environmental Quality Board
Gregg Downing
100 Capital Square Building
550 Cedar Street
St. Paul, MN 55101

Re: Airport South
Draft Environmental Impact Statement
District 5 (Bloomington)

Dear Mr. Downing:

The Minnesota Department of Transportation (Mn/DOT) has completed a review of the Airport South Draft Environmental Impact Statement. The proposed development is located in what is considered to be a high noise impact area because of its proximity to aircraft and transportation facilities. The bulk of our concerns therefore, deal with noise issues. We offer the following comments for your consideration in preparing the final EIS.

1 Since site development will be influenced by airport operations, several observations are important. First, the number of aircraft operations at Minneapolis-St. Paul International Airport (MSP) has increased substantially over the number used to establish the contours in the draft EIS. New data, not available when the contours were developed, indicate that individual fly-overs may generate peak noise levels as high as 104-105 dBA in parts of the Airport South development area. Second, since the deregulation of the airlines in 1978, the number of airline operations at MSP has almost doubled. Carriers are free to enter any market they choose with few restrictions. Airport operators have little control over the number of carriers serving an airport or their operations. Finally, while new, quieter jets are now in the fleet, many older and noisier jets will remain in the fleet for the foreseeable future, even with the Federal Aviation Regulation 36 restrictions, which fail to establish absolute noise levels. Allowable noise levels are based on aircraft weight and, therefore, heavier aircraft are free to make substantially more noise than lighter ones.

An Equal Opportunity Employer

RESPONSES:

1. This paragraph compares "peak noise levels" and data from figures 6-19, 6-20 and 6-21 which are predicted using a noise averaging measure called L_{eq} . Figure 6-21 predicts the change in noise contours resulting from the operational and aircraft changes described in this paragraph. Since 1982, the City of Bloomington has been requiring acoustic treatment of new structures within the noise impact zones of the International Airport. Our plan check engineers and senior environmental health specialist are competent in evaluating acoustical treatment of buildings. Our experience indicates that developer costs of implementing appropriate acoustic insulation in new buildings is not significant.

1. While development of the site can be made compatible with the noise environment, developers should be aware that the costs will be higher than normal due to the necessity to acoustically treat buildings to attain a satisfactory interior noise level. This would include evaluation of building plans by someone with expertise in acoustics. If acoustical consultation is not used in structure development, community opposition against the airport can be expected. This opposition has the potential of undermining a major noise mitigation effort of the Metropolitan Airport Commission called the Preferential Runway Utilization System.

2. In regard to highway transportation facilities, Mn/DOT suggests that a more detailed statement of noise control measures be included in the final EIS. Items which would be helpful include:

- A layout showing possible barrier and receiver locations along with ambient and predicted noise levels.
- A table showing a comparison of height and cost of daytime and nighttime barriers. This would have greater significance than stating that building a nighttime noise barrier isn't economically feasible.
- A map depicting areas where it might be feasible to have changes made in land use planning and zoning in order to lessen or mitigate noise impacts.

3. Mn/DOT has several suggestions for changes in the EIS regarding bicycle transportation. Statements about bikeways should be strengthened to include a discussion of bicycle commuting. Encouragement of bicycle commuting could be an additional means of mitigating adverse impacts caused by increased traffic volumes near the proposed Airport South development. Safe bicycle transportation facilities should be considered within future roadway construction projects in this area. In addition, bicycle support facilities, such as secure parking and showers, could be planned with the proposed development to further facilitate bicycle commuting. Development plans should include consideration of connections to major bicycle facilities developed by Mn/DOT in the

RESPONSES:

2. See FEIS Section 2.3
3. Figure 6.42, Regional Trail Corridors, page 6-133 of the DEIS identifies trail corridors contained in the City's Comprehensive plan. These corridor locations in Bloomington are the result of detailed discussions between the City of Bloomington and the U.S Fish and Wildlife Service during the period when both organizations were developing their comprehensive plans. The City will make every effort to implement this system when adjacent roads are constructed or adjacent parcels are developed.

The City hopes that bikeways will provide an attractive means of travel to work for people in the Airport South area. However, the conservative approach taken in evaluating impacts on the regional system makes it difficult to conclude that a bikeway system will have any measurable effect on the worst case peak hour volumes.

3 project area including a separated bicycle/pedestrian crossing on the Cedar Avenue Bridge and the Interstate 494 bridge over the Minnesota River, as well as plans for bikeway design within the Hiawatha Avenue corridor. Finally, although a minor point, page 2-3 under Scoping Decision, Transportation Plans, includes a confusing statement regarding bikeways: "The impacts of any proposed pedestrian and/or bicycle pathways... will be completed". Perhaps some wording has been unintentionally omitted.

4 As a final point Mn/DOT would like to reemphasize the commonly known fact that the potential growth for the Airport South area is quite high and yet the transportation facilities necessary to accomodate this growth are not presently in place. Mn/DOT has not at this time programmed improvements that would provide adequate service to these potential traffic generators. Impacts to our state transportation systems must remain a key guiding element in any future development of Airport South. Any further discussion of this issue in the final EIS would be most helpful.

Thank you for the opportunity to review and comment on the draft EIS for the Airport South development. If you have any questions regarding Mn/DOT's comments or require any additional information from Mn/DOT, please contact me.

Sincerely,

Cheryl Heide
Cheryl Heide, Planner
Office of Environmental Services



RESPONSES:

4. The City of Bloomington and Mn/DOT have agreed to a work program that initiates the appropriate project development process for upgrading TH 77 between E. 86th Street and I-494. The work program includes environmental analysis, the development of a funding plan, and a public participation process. The City of Bloomington is committed to maintaining the service levels on the state transportation system as well as providing the transportation facilities necessary to accommodate the projected growth for the Airport South area. The City of Bloomington is also committed to use of travel demand management to make the most effective use of existing transportation facilities. Also see FEIS Section 2.2.2.



Minnesota Pollution Control Agency

September 5, 1984

Mr. Gregg Downing
Minnesota Environmental Quality Board
Room 110, Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101



Dear Mr. Downing:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the draft generic environmental impact statement (EIS) for the Airport South project in the City of Bloomington. As you know, the Division of Air Quality and Office of Planning and Review staff have participated as members of the project management team for the project for about two years. During that time, the staff has provided input to the project management group regarding our agency's requirements concerning project-related transportation, air quality, noise, and water quality impacts. As such, the staff finds that the draft EIS is, in general, adequate. We do, however, have some specific concerns which should be addressed in the areas of air quality and transportation analysis, noise and water quality.

Air Quality and Transportation Analysis

The draft EIS notes that there exist many uncertainties about the type, level, and timing of development and associated traffic forecast parameters. While final details to handle these uncertainties must be included in the generic indirect source permit, the following discussions should be included in the final EIS:

5

1. The type, level, and timing of development will influence traffic projections and in turn air quality. The final EIS should address the question of monitoring development. As indicated in the draft EIS, they will be establishing a program to monitor how development conforms in terms of types and amount of land uses to their projections.

Phone: 296-7301

1935 West County Road B2, Roseville, Minnesota 55113-2785

Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Equal Opportunity Employer

RESPONSES:

5. See FEIS Section 2.2.3.

6 2. Development and traffic parameter forecasts including emissions, vehicle occupancy, and trip rates are subject to a number of uncertainties. The final EIS should address the question of roadway capacity and funding and relate these issues to the actual nature of ongoing development. Some indication of requirements for roadway improvements and travel demand management (TDM) relative to development level and specific chronology should be included. While this is tentatively discussed in the draft EIS, a more definitive treatment is needed.

7 3. Certain levels of roadway improvements will be needed if development and traffic forecast parameters warrant them. The final EIS should address who will commit to what roadway improvements and TDM, with what legally binding agreements, and with what committed funding, given a certain level of monitored development or worsening of traffic forecasts.

Noise

8 The staff has no significant concerns with the noise analyses conducted for the project. However, the development should be consistent with the Land Use Compatibility Guidelines for Aircraft Noise issued by the Metropolitan Council. This fact should be emphasized in the final EIS. Enforcement of the Bloomington city noise ordinance is expected to adequately control noise due to construction related activities.

Existing noise levels near TH 77 (Cedar Avenue) and Killibrew Drive are currently above the state noise standards. Since it is predicted that project noise levels will not significantly contribute to existing noise levels, there will not be a significant problem in this area. However, it should be noted that any retaining walls to be utilized as noise barriers should be designed in accordance with acoustic considerations.

Water Quality Impacts

9 The water quality classification applicable to Long Meadow Lake is fisheries and recreation Class B. Water quality standards for this class represent a higher degree of protection for Long Meadow Lake waters than for the adjacent waters of the Minnesota River. In this light, diversion of storm water from Long Meadow Lake should be evaluated in greater detail in the final EIS.

10 The minimum total phosphorus value cited for Long Meadow Lake in Table 6.32 is incorrect. It appears to be .04 milligrams/liter instead of 0.40 mg/l. This should be corrected in the final EIS.

11 The pollutant removal efficiencies anticipated for Pond I and Pond C may be optimistic (see Table 6.28 and page 6-79). It is the staff's opinion that more information on the development of these estimates should be presented in the final EIS and that possibly more conservative estimates should be used for planning purposes.

RESPONSES:

6. See FEIS Section 2.2.1.
7. See FEIS Section 2.2.2.
8. No response needed
9. See FEIS Section 2.4.
10. Correction noted
11. See FEIS Section 2.4.

The staff has serious reservations as to the advisability of adding the Pond C outflow to Pond I as a mitigative measure to improve the quality of runoff to Long Meadow Lake. It is felt that this step would frequently produce a hydraulically overloaded condition in which neither pond would function effectively. It may be preferable to allow Pond I to function within the hydraulic parameters of its original design. If it is determined that spare hydraulic capacity exists in Pond I under more limited storm conditions, then it may be advisable to discharge some of the excess storm water from the Pond C watershed to Pond I. This could be accomplished by the construction of an outfall structure with a provision to fix the maximum flow rate to Pond I. Please discuss this in the final EIS.

12

The feasibility of expanding Pond C should be explored in the future. It is also recommended that provisions be made to prevent hydraulic overloading of both ponds by allowing storm water flows in excess of the designed capacity of the ponds to bypass the treatment systems. The feasibility of installing additional storage (e.g., ponds, parking areas) in the upper watershed should also be addressed in the EIS. In addition, future and existing ponds should be allowed to operate in parallel rather than in series in order to reduce hydraulic overloading. Maintenance schedules for retention ponds should be established by the affected municipalities.

Thank you for the opportunity to comment on this project. If you have any questions regarding these comments, please contact Deborah Pile, Director of the Office of Planning and Review, at 612/296-7799.

Sincerely,



Thomas J. Kalitowski
Executive Director

RESPONSES:

12. See FEIS Section 2.4.



Metropolitan Council
300 Metro Square Building
Seventh and Robert Streets
St. Paul, Minnesota 55101

Telephone (612) 291-5354

August 20, 1984

Thomas Rulland, Manager
Environmental Review Section
Environmental Quality Board
Capitol Square Building
St. Paul, Minnesota 55101

RE: Draft Environmental Impact Statement (EIS)
Bloomington Airport South
Metropolitan Council Referral File No. 12231-1

Dear Mr. Rulland:

At its meeting on August 9, 1984, the Metropolitan Council considered the draft Environmental Impact Statement on Bloomington Airport South. This consideration was based on a report of the Metropolitan and Community Development Committee, Referral Report No. 84-89. A copy of this report is attached.

The Council has adopted the comments contained in Referral Report No. 84-89 on the Bloomington Airport South Draft Generic Environmental Impact Statement.

Attached is a copy of a letter from the Hennepin County Department of Transportation commenting on this draft EIS.

Sincerely,

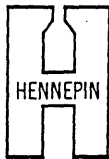

Sandra S. Gardebring
Chair

SSG:sb
Attachment

cc: Greg Downing, EQB
John Pidgeon, Manager, City of Bloomington
Richard Wolsfeld, BRW, Inc.
James M. Wold, Chief, Planning & Programming, Hennepin Co. Dept. of Transportation
Barbara Senness, Metropolitan Council Staff



An Equal Opportunity Employer



DEPARTMENT OF TRANSPORTATION
320 Washington Av. South
Hopkins, Minnesota 55343



935-3381
TTY 935-6433

July 31, 1984

Mr. John Rutford
Referral Coordinator
Metropolitan Council
300 Metro Square Building
Seventh & Roberts Streets
St. Paul, Minnesota 55101

Re: City of Bloomington
Draft Environmental Impact Statement
Airport South
Referral File No. 12231-1

Dear Mr. Rutford:

Thank you for submitting the Airport South Draft Environmental Impact Statement (DEIS) to us for review and comment. The Hennepin County Department of Transportation reviewed the DEIS with respect to transportation issues and impacts.

The DEIS adequately identifies impacts, alternatives, and possible mitigation measures. We support the Airport South DEIS and look forward to continued participation in the projects development.

Sincerely,

James M. Wold, P.E.
Chief, Planning and Programming

JMW/DBM:pl

HENNEPIN COUNTY
an equal opportunity employer

8-2

METROPOLITAN COUNCIL
Suite 300 Metro Square Building, Saint Paul, Minnesota 55101
291-6359

REPORT OF THE METROPOLITAN AND COMMUNITY DEVELOPMENT COMMITTEE
Referral Report No. 84-89

DATE: August 3, 1984
TO: Metropolitan Council
SUBJECT: Bloomington Airport South Draft Generic
Environmental Impact Statement (EIS)
Metropolitan Council Referral File No. 12231-1

BACKGROUND

At its meeting on August 2, 1984, the Metropolitan and Community Development Committee discussed a staff report and recommendations dealing with the review of the Bloomington Airport South Draft Generic EIS.

ISSUES AND CONCERNS

Barbara Senness, Council staff (ext. 419), presented the report and answered questions from the Committee. Prior to discussing the staff report, Mrs. Senness introduced Dick Wolsfeld, BRW, and consultant to the city who gave a slide presentation covering the background on the overall Airport South Transportation and Environmental Management Study and a summary of the Draft EIS.

The committee asked Mr. Wolsfeld numerous questions about the EIS and what it did and did not do. He responded that different land use assumptions would change the impacts and noted that the possibility of a convention center on the Met Sports Center site has not been studied. He also indicated that the EIS identifies impacts and possible mitigating measures, but it does not provide the answer as to how problems would be solved. He did say, however, that the major problem, capacity on I-494, will not be a problem for many years to come.

In her presentation, Mrs. Senness highlighted the staff's transportation comments. She also discussed two corrections to the report. On page 2, the second paragraph under comments, the phrase "which is the proposed action" was added to the end of the following sentence: "The final EIS, which the Council will be asked to comment on, will include a preferred alternative."

On page 4, the last sentence in the second paragraph should have read: "In the future, as parking demand approaches supply, Bloomington should consider parking controls as another travel demand management step."

OTHER ISSUES/COMMENTS

Rick Geshwiler, Sr. Planner, City of Bloomington, told the committee the city has appreciated working with the Council over the past five years, first on its comprehensive plan and more recently on the Airport South Study. The city was generally pleased with the results of the study and it has achieved both its local and regional purpose.

He discussed five concerns the city has with the staff report. First, on page 3 the report discussed the Council, Bloomington and MnDOT working to resolve problems on I-494. He stated that Bloomington should not be singled out here and that other communities were also developing and contributing traffic to I-494. Second, he noted that while the transportation comments discussed most of the mitigation measures, the widening of I-494 was not addressed. He asked that this be done. Third, he stated the parking policy issue raised in the transportation comments was considered in the traffic demand management analysis and dropped as not being effective in controlling traffic in the Airport South area. He asked that the staff comments on parking be deleted. Fourth, the city objected to the statement on page 5, under Economic Analysis, that while Bloomington is developing now, historically, development moves around. Bloomington has led the area in development and this statement implies that Bloomington gets the leftovers. Finally, as a generic comment, he stated that the discussion in the report on development projections casts the projections more as allocations. He stated that he didn't believe either the city or the Council wanted allocations, but rather coordination of local and regional systems.

Following are major points of concern raised by the committee:

In response to Mr. Geshwiler's requests, the following changes were made in the staff report. Page 3, last sentence of first paragraph, the reference to Bloomington was dropped. Page 5, Economic Analysis, first sentence in the second paragraph revised to read "Development in major cities in the region tends to be cyclical."

Regarding Mr. Geshwiler's other requests, after discussion the committee felt the staff report should stand as written.

RECOMMENDATION

That the Metropolitan Council adopt these comments on the Bloomington Airport South Draft Generic Environmental Impact Statement and forward them to the Minnesota Environmental Quality Board.

Respectfully submitted,

Joan Campbell, Chair

JC:sje

SE1606-PHENV2

METROPOLITAN COUNCIL
Suite 300 Metro Square Building, St. Paul, Minnesota 55101
612-291-6359

DATE: July 27, 1984
TO: Metropolitan and Community Development Committee
FROM: Barbara Senness
SUBJECT: Bloomington Airport South Draft Generic
Environmental Impact Statement (EIS)
Metropolitan Council Referral File No. 12231-1

A. INTRODUCTION

The Minnesota Environmental Quality Board (MEQB) has submitted a Draft Generic EIS for the Airport South District in Bloomington for review. This is the first generic EIS undertaken under the new state environmental rules and regulations. A generic EIS differs from a site-specific EIS in two ways:

1. The purpose of the generic EIS is to study a number of individual projects collectively in order to evaluate potential cumulative effects of the individual actions which by themselves may not result in any significant environmental impacts;
2. Some of the projects covered in the generic EIS are hypothetical in that no specific project has yet been proposed.

Because of these differences, the preparation of a generic EIS does not exempt specific projects or activities covered by the EIS from project-specific environmental review. However, the generic EIS will help expedite subsequent reviews. Specifically, as the EIS is finalized, the City of Bloomington will propose an alternative review process to the MEQB to expedite project-specific reviews in instances where the project is consistent with subdistrict development projections. Even in instances where differences exist and a project-specific review is required, the generic EIS will be used as the primary data base for the project-specific review, thereby substantially reducing the amount of work needed to complete a specific review.

The Council's review of this EIS for Airport South is not then its final review; the Council will also review individual projects which exceed state environmental review thresholds. However, an important aspect of this EIS is that it alerts the city, the Council and other regional agencies, the Minnesota Department of Transportation (Mn/DOT) and Hennepin County to potential future problems and it outlines alternative ways to address those problems.

The Council commends the City of Bloomington for introducing a generic EIS for a major development district. This is a new strategy that the Council can encourage other communities to follow in dealing with complicated development issues in the region.

B. AUTHORITY TO REVIEW

Draft EISs prepared under the Minnesota Environmental Review Program must be submitted to the Council and other agencies. Any recipient of an EIS or member of the public may make comments and recommendations to the responsible agency. The responsible agency for this project is the MEQB.

C. PROJECT AREA AND DESCRIPTION

The Airport South District is bounded on the north by I-494, on the south and east by the Minnesota River and on the west by Cedar Av. (Trunk Highway 77). It covers approximately 2,350 acres. About 1,450 acres are designated for conservation land use as part of the Minnesota Valley National Wildlife Refuge and Recreation Area. Another 600 acres are developed in commercial, light industrial and residential land uses. Bloomington proposes to develop the remaining 300 acres, which includes the Metropolitan Stadium site, as high intensity mixed use. By the year 2000, the city is projecting 4.3 million square feet of additional office development, 900,000 square feet of retail space, 2,365 new hotel rooms and 2,535 high density-type housing units to develop in Airport South.

D. COMMENTS

The City of Bloomington and the Metropolitan Council, together with Mn/DOT, Hennepin County, and the Metropolitan Transit and Airports Commissions with assistance from the MEQB and Minnesota Pollution Control Agency have worked over the past two years developing the Airport South Transportation and Environmental Management Study which includes this generic EIS.

Last October, the MEQB issued a scoping decision outlining what issues and alternatives had to be addressed in the EIS. The EIS analyzed four transportation and development alternatives, including a no-build alternative, selected according to the methods outlined in the scoping decision. The amount of development summarized above represents the highest level of development analyzed. Three lesser levels of development were also considered. The final EIS, which the Council will be asked to comment on, will include a preferred alternative, which is the proposed action. According to the MEQB's directions, about a dozen major issues were analyzed as well. From the regional perspective, the most critical issues looked at were transportation, air quality, waste water treatment, surface and groundwater and consistency with local/regional plans.

The Council's role is to comment as to how adequately the Draft EIS addresses the issues outlined in the scoping decision. It is not to approve or disapprove, for example, the amount of development proposed, the developing timing or the appropriateness of the mitigation measures. Furthermore, the Council's review does not obligate it to any financial commitments for improvements to metropolitan systems.

1. Transportation

The traffic analysis in the Airport South Draft EIS is one of the most thorough and comprehensive ever submitted for Council review. Council staff has been involved in inputs to the analysis and has maintained familiarity with procedures and results throughout the study. Its results are so far reaching that it establishes agendas for others than

results are so far reaching that it establishes agendas for others than Bloomington alone. What the traffic analysis shows will require a continued combination of local and regional efforts to solve. It is clear that traffic on I-494 will be a continuing long-term problem. The assumptions used in the study can be changed in future work to reflect new Development Framework inputs but the results will be similar: demand in the I-494 corridor will continue to rise. At present, there is no serious crisis, but the Council should in the time available do what it can working with Bloomington and Mn/DOT to avoid future problems.

Because of the scope of this project and its long-term horizon for planning and implementation, the Airport South transportation analysis touches on many aspects of the regional Transportation Policy Plan. However, five regional policies are critical to the evaluation. They are policies 1., 3., 29., 30., and 31 as follows:

1. Transportation facilities should be planned, designed and operated to promote and serve development that is consistent with the Development Framework Chapter of the Metropolitan Development Guide.
3. Transportation systems should be developed and managed to utilize existing investments more efficiently and effectively.
29. Municipalities should develop local circulation, transit and joint parking systems for high-activity contiguous land-use areas, to accommodate local traffic and consolidate parking.
30. Shorter trips and reduced auto driving should be promoted by:
 - a. Encouraging travel patterns whereby people live, work and shop within subregions.
 - b. Providing high quality, convenient transit service, commensurate with the demand, to the major activity centers from their subregion.
31. Multipassenger strategies should be generally promoted at the regional level and specifically encouraged at the subregional/local level by:
 - a. Establishing on-going ridesharing programs that are cost-effective.
 - b. Fostering a close partnership between the public and private sectors in the provision of ridesharing services.
 - c. Targeting selected problem areas, congested corridors or subregions.

In accordance with policy 1, development of the Airport South District is accepted in this analysis as being consistent with the Development Framework. In addition, it is consistent with the subregional orientation of the transportation policies by establishing a focus of working and living opportunities within subregion 3. To the extent that development stays near or within the I-494/I-694 ring, trip lengths will be reduced and existing regional transportation facilities will not need to be extended beyond the Metropolitan Urban Service Area. Development in the Airport South District has the potential to provide that benefit to the regional transportation system. At the same time, without proper action the same development will contribute to, but not be the sole cause of, reduced service levels for mainline traffic movements on I-494. The traffic analysis completely and convincingly documents that fact.

In accordance with policy 3, however, the system should be developed and managed to utilize investments efficiently and effectively. The list of mitigating measures provided in the Draft EIS addresses both system improvements such as the Killebrew Dr. interchange and traffic demand management strategies such as carpooling which would utilize I-494 more efficiently by reducing overall vehicle demand from the proposed development. The analysis does not discuss the fact that both ridesharing and transit are economically influenced in parts of the region where they are used the most, such as to the downtowns or at 3M. The economics is the economics of parking, either through charges as in the downtowns, or through conscious developer control, as with 3M. 3M has shown that auto occupancies of 2.0 are possible for employees and this level of travel demand management would be a strong mitigating influence. In the future, as the parking supply approaches demand, Bloomington should consider parking controls as another travel demand management step.

In accordance with policies 29, 30 and 31, several of the mitigating measures proposed in the Draft EIS are most appropriate. As noted above, a parking strategy would also be appropriate. As Bloomington, the Council, Mn/DOT and others move to implement the Airport South plans, each should expect to integrate ridesharing, subregional transit services and parking policy, as the preferred strategies to land use controls to protect service levels on I-494.

However, Bloomington has adopted a policy which says that if the capacity of the transportation system is reached, the amount of additional development approved for construction will be limited by the capability of the existing and committed transportation system to support this development, provided that the Metropolitan Council requires all Metropolitan Area communities to comply with this policy.

When it first reviewed this policy, the Council was concerned about the implications of needing to study the entire Metropolitan Area. In addition, although there was agreement that the Council expects to maintain the integrity of both the transportation system and the Development Framework, the Council noted that the policy is not now a part of the Transportation Policy Plan and should have public debate.

The Council is currently revising the Development Framework, with a greater emphasis on coordination with metropolitan systems. Parallel

13

RESPONSES:

13. Bloomington and the Metropolitan Council have had numerous discussions about Bloomington's Policy 2 throughout the preparation of the draft EIS. As a result of these discussions Bloomington recognizes that the Metropolitan Council may or may not integrate the concept of limiting development based on the capacity of the transportation system into its revised Metropolitan Development Framework.

to this effort, the Council will undertake a special study of Bloomington's policy, looking at what questions it raises, researching how it could be implemented and finally, recommending how the policy may or may not be integrated into a revised Framework.

2. Metropolitan Development Framework

The Metropolitan Development (MDF) strongly promotes development within the Metropolitan Urban Service Area (MUSA) and particularly within the Fully Developed Area of the MUSA. The MDF also endorses infill and redevelopment in the Fully Developed Area. The type of development proposed within the Airport South District clearly supports the MDF in this regard.

As noted in the draft EIS, a comparison of the Council's preliminary MDF forecasts for the city of Bloomington with the Airport South forecasts prepared by Bloomington indicates that the two forecasts can be compatible as long as Bloomington's forecasts for the balance of the city do not exceed MDF totals.

3. Economic Analysis

The EIS documents each economic forecast component for Airport South. It shows how commercial space is expected to expand in the Bloomington, Edina and Richfield area and the region. It then forecasts retail space and gives a rationale for locating in the study area. Hotel and residential development growth assumptions were listed and discussed.

Bloomington is one of the cities in the region that is currently developing, but, historically development moves around. It stops in areas that fill up available land and starts again in areas where favorable financial arrangements are negotiated. For example, during the early 1970s, there was little activity in Minneapolis or St. Paul; from 1978 until 1983, they were first or second place in commercial permits issued.

Some areas appear to capture a large share of the regions activity over a long period. The southwest area has consistently kept pace with regional growth over the last decade. The southwest area includes Bloomington, Edina, Richfield, Eden Prairie, Burnsville and all of the cities and townships south and west of them. From 1970 to 1978, the area captured 28 percent of the region's commercial development. From 1978 to 1982, it captured 34 percent. The southwest area is different than the area analyzed in the EIS (Bloomington, Edina and Richfield). The southwest area includes new fast developing areas. The area chosen for the draft EIS study is nearly developed, in fact some of the largest undeveloped sites are in the study area. That is, they were the last to develop under market conditions. In addition, a major component of commercial development will not be built in the three cities analyzed; there will be little or no warehouse office or garden office activity in the three cities. From 1972 to 1982, they were a major component. These cities are now expected to develop out with expensive offices, hotels and residential use. Such development is difficult to forecast. When a full range of development options is available, an area usually appears to follow a trend.

Because many variables are involved in a development of this nature and magnitude, it is most likely that intervening factors will either shorten or lengthen the time frame in which development will actually occur. The issue of timing needs to be carefully considered in Bloomington's planning and the planning done by other agencies and points especially to the importance of the monitoring component of Bloomington's implementation program.

E. CONCLUSIONS

The Airport South Draft EIS adequately addresses the issues raised in the scoping decision, notably the important regional issues of transportation, air quality, waste water treatment, surface and groundwater and consistency with local/regional plans. The EIS also presents information that clearly documents the need for completion of other elements of the overall Airport South Study, specifically, the Transportation Plan, the Travel Demand Management Plan and the Capital Improvements Plan. These elements are needed in order to establish a common agenda and action plan to resolve the potential traffic problems outlined in the EIS.

In this regard, some of the actions the Council needs to take include moving to protect service levels along the I-494 corridor. Both Mn/DOT and the Council must develop near- and long-term solutions for this critical corridor, including preparation of a plan and timetable for ramp metering on I-494 and preparing plans and timetables for selected bottleneck improvements on I-494 at I-35W, Highway 100 and Cedar. Traffic is building at interchange locations and these locations may afford opportunities for staged improvements without committing to expansion of the entire route. In general, the type and level of service improvements will be influenced by the type and level of development that occurs.

Bloomington has begun a process which can clearly help expedite realizing the full development potential of the Airport South District. The Council will continue to cooperate with the city in this effort.

F. RECOMMENDATION

That the Metropolitan Council adopt these comments on the Bloomington Airport South Draft Generic Environmental Impact Statement and forward them to the Minnesota Environmental Quality Board.

BS:emp
SE1606, PHENV2

DECATHLON ATHLETIC CLUB

1800 CEDAR AVENUE SOUTH
BLOOMINGTON, MINNESOTA 55420

September 4, 1984

Gregg Downing
Environmental Renew Coordinator
Environmental Quality Board
Room 100
550 Cedar St.
St. Paul, Minnesota 55101



Dear Mr. Downing:

Mr. Rick Geshwiler has advised me that questions regarding the Airport South Study be forwarded to your office.

The Decathlon Athletic Club and it's neighbors, Metropolitan State Bank, Eddie Websters and Rodeway Inn, have a great deal of interest in the following issues.

- 14 | 1) Will the overall construction and development of Cedar Avenue begin with the 79th street underpass?
- 15 | 2) Will pedestrian walkways be a part of this underpass?
- 16 | 3) Will the underpass be built with four or six operational traffic lanes? If six, where will 79th street return to four lanes westbound?
- 17 | 4) What will happen to the frontage road currently serving the above listed businesses? How can we offer input to this determination?
- 17 | 5) Would there be any possibility of a possible secondary ramp off of the "Cedar Avenue South" ramp accessing 79th street? See attachment.

We sincerely look forward to your reply on these issues.

Sincerely,

John Justice
Assistant Manager

JJ/do

cc: Rick Geshwiler
City of Bloomington
2215 West Old Shakopee Road
Bloomington, MN 55431

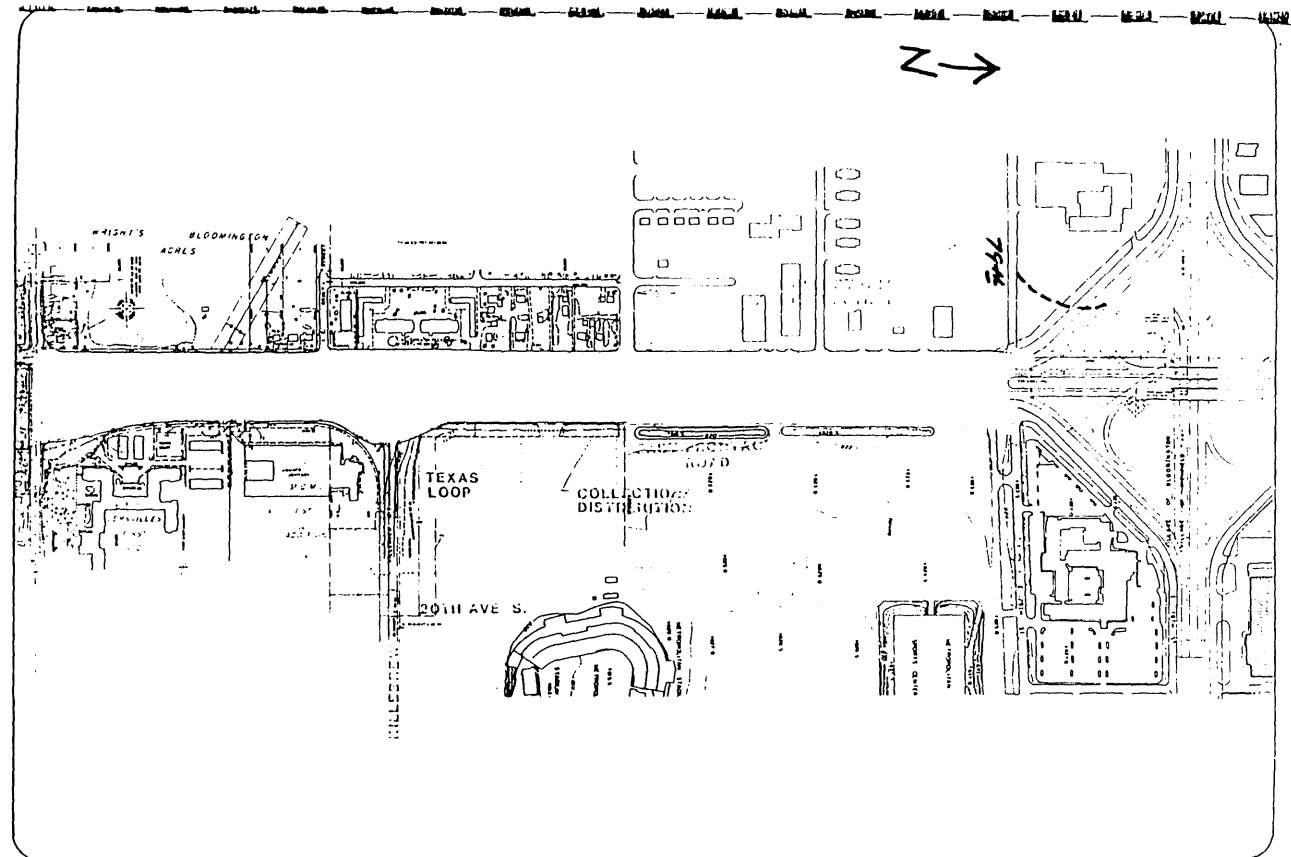
cc: John Karr
Northstar Financial Corporation
7901 Cedar Avenue South
Bloomington, MN 55420



RESPONSES:

- 14. The City of Bloomington and the Minnesota Department of Transportation recognize the need to maintain access during the construction of this project to the businesses along the south side of I-494 between 12th Avenue and TH 77 and the existing businesses in the Airport South District. The staging of construction will be an important factor in maintaining good access and maintaining good traffic operations on TH 77. The construction staging will be worked out during the preliminary and final engineering for the project and therefore it is not known where the construction will begin. The City of Bloomington would like to see the 79th Street underpass constructed in the first phase.
- 15. The City recognizes the need for additional pedestrian access between the east and west sides of TH 77 and the 79th Street underpass would be a logical place to provide this connection. The details of where the walkways are to be located and the number of lanes in the underpass will be determined during the preliminary engineering for the project.

16. It is currently planned to terminate the I-494 south frontage road north of E. 79th Street, probably at the Decathlon parking lot. The frontage road would still provide access to all the properties on the frontage road, but it would not be possible to get directly to the frontage road from the south on Old Cedar Avenue. Preliminary and final design on the TH 77/Killebrew Drive project will involve a number of public meetings during which public input to the design will be taken. In addition, City staff will be working closely with the project and comments may be directed to them.
17. The possibility of a secondary ramp off the eastbound I-494 to southbound TH 77 ramp was considered as part of the initial study and was dropped because it would not meet federal and state design standards.



TRANSPORTATION
AND ENVIRONMENTAL
MANAGEMENT STUDY

FIGURE 5.5
PROPOSED T.H. 77
IMPROVEMENTS





7901 CEDAR AV. S. BLOOMINGTON, MN 55420
(612) 853-9333



September 4, 1984

MEMORANDUM

TO: Greg Downing

FROM: Jim Goddard

SUBJ: Comments on Draft Environmental Impact Statement for Airport South Project

This is to offer our comments regarding the Draft Environmental Impact Statement (DEIS) for the Airport South Project. We have reviewed this DEIS from the standpoint of its responsiveness to the traffic and parking needs for the Met Center.

We have comments on three items, which are referenced to the pertinent section and page in the DEIS and are listed in the same order as the points are addressed in the report.

Section and Page
in DEIS

Comment

5.4.3 Transportation
Facility Improvement
Alternatives, p. 5-18
addressing project
area 2 (T.H. 77)

The middle paragraph on this page addresses two alternatives for a north-south local roadway on the west side of the Met Center site:

- 1) "Construct a temporary 20th Avenue alignment adjacent to T.H. 77 with construction of the permanent road postponed until development occurs on the north 47 acres or until requested by operators of the Met Center."
- 2) "Construct permanent 20th Avenue alignment adjacent to the west edge of Met Center."

This discussion conveys the impression that if option 1 is chosen, it would just be a temporary solution.

We believe that option 1 should also be retained as a potential permanent solution. This option is included in the approved plan for T.H. 77 (shown in Figure 5.5 in the DEIS). The effect of this recommendation

18



HOME OF THE MINNESOTA NORTH STARS



RESPONSES:

18. The City of Bloomington understands the need for flexibility in permanently locating 20th Avenue between the Met Stadium site and E. 79th Street. Many of the City's temporary streets have been in place for over 20 years. The purpose of this EIS is to study conditions 15 years in the future. There is every possibility that the temporary solution would be "permanent" through the time frame of the study. Until the time a decision is made to replace the temporary alignment of 20th Avenue South with a permanent street both alternatives will receive equal consideration.

	<u>Section and Page in DEIS</u>	<u>Comment</u>
18		is to preserve some choice in meeting the north-south local roadway needs. In this context, when a decision is required on the alignment and permanence of this roadway, such a decision can be made utilizing the most current information available regarding the interests of the City, Northstar Financial Corporation, and other participants.
19	5.4.3 Transportation Facility Improvement Alternatives, p. 5-20 addressing project area 4 (79th/80th St.)	This section defines three stages for the 79th/80th Street improvement, the third stage of which would involve connecting 79th Street with 80th Street through the Met Center site. The following specific statement is made: "While stage 3 would improve traffic operations for through trips on 79th/80th Streets, analysis indicates that more vehicles would be turning than making the through movement. If this forecasted condition actually occurs, stage 3 is not recommended." We fully concur with that statement and would suggest that the Northstar Financial Corporation also support this statement, indicating that stage 3 would cause severe impacts for the Met Center access and parking.
20	7.1.2 Travel Demand Management, p. 7-17 addressing implementation, funding and monitoring	This section discusses several possible means of funding a travel demand management program, including several options that could involve fees charged to the Northstar Financial Corporation, e.g. "fee-in-lieu of parking, annual assessment district, one-time payment at occupancy or a building permit surcharge." In our judgement, a key point relative to this discussion is that any fees charged to your organization be commensurate with benefits that you receive.

RESPONSES:

19. No response needed.
20. The purpose of travel demand management strategies is to reduce peak hour vehicle trips. To the extent the Met Center would have event traffic entering or exiting the area during peak periods these strategies will benefit the Met Center. The concept of any fee system to encourage travel demand management should be based upon an objective evaluation of benefit.

Adoption of any travel demand management measures will be made by the City Council in a process separate from this EIS. The normal Council notification and decision-making processes will be followed, including the comparison of fees and benefits to effected parties.

National Audubon Society

NORTH MIDWEST REGIONAL OFFICE
SUITE 920, LUMBER EXCHANGE BUILDING
10 SOUTH FIFTH STREET, MINNEAPOLIS, MN 55401 (612) 375-9140



September 4, 1984

The Environmental Quality Board
State of Minnesota
c/o Mr. Greg Downing
Room 100 Capitol Square Bldg.
550 Cedar Street
St. Paul, Minnesota 55101



Gentlemen:

Enclosed are comments by the North Midwest Regional Office of the National Audubon Society on the Draft Environmental Impact Statement for the proposed Airport South project.

The National Audubon Society is concerned with the integrity of all National Wildlife Refuges, and especially in this case, the Minnesota Valley Refuge.

The refuge system has the potential to provide society with enormous wildlife benefits. In the face of increasing habitat loss and environmental destruction for short-term gain, refuges stand alone as lands devoted solely to preserving and enhancing wildlife habitat.

It is with these benefits in mind that we offer comments on the DEIS. In most cases, amplification of information given or additional information is necessary. Specifically:

Section 6-2 Air Quality:

21 Why was the impact of only carbon monoxide chosen for discussion? Increased traffic as expected from the project could alter the levels not only of carbon monoxide, but of particulates, hydrocarbons, lead, nitrogen dioxide, sulfur dioxide and photochemical oxidants. The MPCA is charged with monitoring these pollutants to insure compliance with state and national standards. All potential air pollutant levels impacted by the project need to be discussed in an EIS.

Iowa • Minnesota • North Dakota • South Dakota • Wisconsin
AMERICANS COMMITTED TO CONSERVATION

RESPONSES:

21. The air quality analysis was limited to carbon monoxide by the scoping decision (p. 2-3). Monitoring and previous studies of automotive emissions of hydrocarbons, nitrogen oxides, and lead have indicated that concentrations of these pollutants are below the applicable air quality standards in the metropolitan area. Vehicles operating on paved highways are not a significant source of particulates or sulfur oxides. Photo chemical oxidants are problems on a regional scale and are evaluated by the Metropolitan Council regionally rather than on a project specific basis.

Due to the uncertainties about the specific types of development to be constructed, point sources of pollution could not be identified. Major point sources would be regulated by the Minnesota Pollution Control Agency. The commercial and residential uses proposed for the District will not be major sources of air pollution.

Aircraft emissions were taken into account in the carbon monoxide analysis. The background monitoring was conducted while aircraft were operating so some component of the background concentrations are a result of aircraft emissions. The background concentrations were added to local concentrations to determine total carbon monoxide concentrations.

Section 6.5.3-(Stormwater) Runoff Quantity:

It is unclear how this statement could be correct: "the net effect of development on runoff within the proposed Airport South District ... (from) the annual runoff volumes to Long Meadow Lake from the watershed would increase only about six percent . . . for a year with average precipitation".

Summarizing the text, it is evident that:

<u>Watershed</u>	<u>Stormwater Volume Increase</u> (with proposed Airport South Project:
Old Shakopee Road	Less than 5%
80th Street	26%
Bluffs	Slight (-) decrease
22nd Avenue	3%
Pond C	2% (includes 4 stormwater treatment and retention basins)
Pond 1	Unclear - no projections for storm sewer and collection system to be built.

Adding the column of stormwater volume increase does not provide a value close to the 6% increase values as stated on the text (even allowing for retention amounts in Pond 1 and Pond C watersheds). More information is needed for clarification.

Also, outfalls from the 80th Street and Old Shakopee Road watersheds will discharge directly into Long Meadow Lake without the benefit of treatment. The text states that "This additional runoff volume is not anticipated to create significant adverse impacts to water quality in Long Meadow Lake provided this additional runoff is treated prior to being discharged (emphasis added) into the lake." However, only Pond C and Pond 1 watersheds are designed to retain water, and only the Pond C watershed is designed to treat the retained water. Thus, the discharge from the outlets for 80th Street and Old Shakopee Road watersheds will enter Long Meadow Lake untreated, and this effect needs to be further discussed as such in the test.

The quantity of runoff affects the water levels in the Refuge, and thus its inhabitants.

Section 6.5.3 Stormwater Runoff Impacts on Receiving Bodies:

Data on water quality of Long Meadow Lake in summer is essential to foretell whether the Minnesota Valley Refuge can maintain a quality environment for the species living there. It is not sufficient to state that during construction water quality will be at the lowest point. How does that level of quality affect the species which use the lake and the Refuge.

RESPONSES:

22. The percentage increases in stormwater runoff volume from each of the watersheds cannot be added to find an average increase in stormwater runoff volume from the Airport South District since the runoff volume is not the same for each watershed. Even if the runoff volume was the same for each watershed the average for the Airport South District would be the same as the value for each watershed, not the total for all watersheds. The percentage increase was calculated by adding the typical runoff volume from all watersheds in Table 6.27 for both the existing and proposed conditions. Because 22nd Avenue is part of the Pond C watershed the runoff volume is already included in the Pond C values and should not be added in again. Therefore, the typical annual runoff volume under the existing conditions is 1,630 acre-feet, and in the proposed condition is 1,728 acre-feet. This is a six percent increase. $[(1728 - 1630)/1630 = .06.]$

23. Treatment basins for the 80th Street and Old Shakopee Road watersheds were evaluated and dropped in the DEIS. These two watersheds only represent seven percent of the forecast six percent increase in runoff volume from the Airport South District to Long Meadow Lake. Runoff affects the water levels in the refuge but the increase in runoff to the refuge from this project would be undetectable compared to the total volume of runoff flowing into the refuge from other areas. See also FEIS Section 2.4.
24. See FEIS Section 2.4.

Section 6.6.3-Groundwater

25 What will the effect of removing a spring be on the Minnesota Valley
Refuge?

Section 6.6.5-Evaluation of Groundwater Impacts:

26 Of what would a "permanent implace dewatering system in the interchange area"
consist? How will this control existing groundwater levels which serve as recharge
to Long Meadow Lake, which abuts the Minnesota Valley Refuge?

Section 6.12.3-Plans of Federal and State Agencies:

27 The City of Bloomington should accelerate their review and adoption of
shoreland zoning ordinances in order for this proposal to proceed further.

Section 6.5.3-Rare, Threatened and Endangered Species:

Before these proposals advance any further, a "detailed site examination
spanning one growing season" should be completed for potential rare, threatened
or endangered plants.

28 Before any actual property adjacent to the Minnesota River Valley bluff is
considered for development, a systematic habitat survey should be undertaken to
determine the parcel's suitability for species included on the Rare, Threatened
or Endangered list. These inventories should be conducted in time for inclusion
in the EIS. I would like to emphasize that a portion of the land proposed for
development in the Airport South project is proposed for acquisition by the
Minnesota Valley Refuge. The fact that the land in Parcel F is designed to be
adjoined to the Refuge indicates that it has inherent environmental qualities which
make it suitable as habitat for a variety of species. The EIS should include a
map indicating the proposed zoning without the Airport South Project, and designate
the entire area proposed as the Minnesota Valley Refuge as a "conservation district."
We appreciate the opportunity to comment on this proposal.

Sincerely,



Carol M. Beim
Regional Representative

RESPONSES:

25. Springs occur at many locations along the bluff. The most prominent
springs occur in a ravine which runs from the 24th Street/Killebrew Drive
intersection down to the Izaak Walton Bass Ponds. These springs occur at
many different elevations in the ravine with the highest spring at elevation
789. The groundwater analysis indicated that development activities adja-
cent to the bluff top could potentially affect the discharge to this upper
level spring should the infiltration of water be reduced adjacent to the
bluff top. However the flows from the other springs should not be
affected. Through the use of infiltration systems on these sites the
infiltration of water can be maintained. Should the upper spring become
dry (which is not expected) it would only affect a portion of the ravine
ecosystem since the lower springs would continue to maintain the present
environment.

26. See FEIS Section 2.5. The development activities and roadway construction in the Airport South District will not affect the volume of water flowing to Long Meadow Lake. However, it may affect the way it gets to Long Meadow Lake. Long Meadow Lake and the Minnesota River are recharged by both surface runoff and groundwater flows. Development activities in the District may increase the amount of impervious surface and therefore result in more surface runoff and less water infiltration. Dewatering the proposed TH 77/Killebrew Drive interchange area would collect groundwater and empty it into Pond C which has an outflow to Long Meadow Lake.
27. The City of Bloomington staff has been in contact with the Department of Natural Resources staff regarding a revised classification of wetlands in Bloomington. Shoreland zoning is scheduled for adoption in the third quarter of 1984 in the Department of Community Development Goals for 1984, but awaits response from the Department of Natural Resources regarding the reclassification of wetlands.
28. Parcels A, B and F have been examined by a qualified plant ecologist for the possible occurrence of rare, threatened and endangered plant species. No rare, threatened or endangered plant species were discovered. Due to the lateness of the season when the search was conducted, it was possible that the presence of ginseng might not have been detected. Therefore, the recommendation was made that a full season search be made of these three parcels as well as an evaluation of parcels C, D1, D2 and E. The search may be done for each site independently as specific proposals are submitted for each site. Alternatively, the City may contract to have all sites evaluated simultaneously. The results of the rare, threatened and endangered plant species survey for Parcels A, B and F are described in Appendix 9.7.

The habitat survey for rare, threatened and endangered animal species will be completed concurrently with the plant search to make the most expeditious use of the field effort.

Single season inventories for rare, threatened and endangered plant and animal species are not preferred since it is possible to miss some species. Therefore, it is not practical nor desirable to conduct such a search at this time. This inventory will be a requirement of the site development approval process.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

Minnesota Valley National Wildlife Refuge
4101 East 78th Street
Bloomington, Minnesota 55420

September 4, 1984



State of Minnesota
Environmental Quality Board
c/o Mr. Greg Downing
Room 100 Capital Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Mr. Downing:

We appreciate the opportunity to review the Draft Environmental Impact Statement prepared for the Airport South District of the City of Bloomington.

A number of questions remain insufficiently resolved pertaining to the impacts of the proposed developments on the environment of the Minnesota River bluffs and floodplains. Specific deficiencies are detailed on pages which follow.

In general, there are two major problems with the DEIS. First, the DEIS fails to adequately review the effects of habitat loss resulting from the build alternatives. The DEIS conclusion regarding the habitat loss on wildlife are poorly substantiated. Secondly, the DEIS fails to adequately evaluate the inconsistency between the Bloomington Comprehensive Plan and the Minnesota Valley National Wildlife Refuge, Recreation Area, and State Trail Comprehensive Plan.

29

We are concerned that these issues were not resolved in the DEIS and that greater attention to these and other concerns expressed in this letter should be made in the final EIS.

Based on the facts which are presented in the DEIS we strongly encourage the City of Bloomington to reject development alternative #1.

Sincerely,

Edward S. Crozier
Refuge Manager

RESPONSES:

29. See Responses to specific comments.

- 30 iii - The DEIS is correct in concluding that the development alternative #2 which prohibits development below the 800' contour elevation would have less impact on the vegetation and wildlife than alternative #1 which would permit development to the 760' elevation. However, the DEIS is understating the overall loss of habitat on wildlife by concluding it is insignificant. Clearly the impacts of alternative #1 would severely affect many species including white-tailed deer, woodpeckers, and other wildlife.
- 31 iv - The City of Bloomington cannot excuse itself from responsibility for resolving the difference between the Minnesota Valley National Wildlife Refuge, Recreation Area and State Trail Comprehensive Plan and the Cities proposed land use plan. The City continues to ignore the proposed boundary of the refuge and recreation area by classifying the tract adjacent to the refuge headquarters as employment oriented mixed use. To be consistent with other land use designations in the DEIS for the refuge and recreation area this parcel of land adjacent to the headquarters should have land use designation "Conservation."
- 32 v - The Fish & Wildlife Service recognizes the inadequacy of the present storm water treatment system and is very interested in discussing mitigation efforts that are proposed by the City of Bloomington. Before further stormwater runoff problems associated with any proposed developments occur we would want to see a comprehensive stormwater runoff treatment system developed.
- 33 2-5 The DEIS does not, as it was directed to by the EQB scoping decision, evaluate the Bloomington Comprehensive Plan's inconsistency with the Minnesota Valley National Wildlife Refuge Recreation Area and State Trail Comprehensive Plan. The incompatibilities were not identified on maps or adequately explained in the text.
- 34 3-5 Proposed Land Use Map should re-classify the area adjacent and to the east of the refuge headquarters to "Conservation" or note the present conflict between City and Federal comprehensive plans.

RESPONSES:

30. See FEIS Summary.

31. The U.S. Department of Interior directs four comments to the same issue, that being the consistency between the U.S. Department of Interior Plan for the Minnesota Valley National Wildlife Refuge and Recreation Area and the adopted City of Bloomington Comprehensive Plan. The purpose of the Environmental Impact Statement is to determine the potential impacts of development, discuss alternatives and to identify mitigative measures. If the Environmental Impact Statement did not discuss development of the Northwest Airlines site it would not have accomplished the primary objective of the Environmental Impact Statement -- to identify potential impacts. Alternatives do exist -- no development on the bluff or for the U.S. Department of Interior to acquire the Northwest Airlines property. Mitigative measures are identified in the Environmental Impact Statement and are thoroughly documented.

32. The Airport South Area is presently served by a comprehensive storm water system designed to handle runoff from developed areas, and new areas as they are developed. The stormwater problems we are aware of are runoff from undeveloped areas which are not served by the storm sewer system and from old storm water systems which discharge directly into Long Meadow Lake without benefit of pretreatment in settling basins.

The City's approach to dealing with these problems is to require slope stabilization and runoff control on undeveloped areas which are disturbed by filling or excavation. The two older outfalls which discharge directly to Long Meadow Lake (identified as Old Shakopee Road outfalls in figure 6.28) carry only 46 acre-feet of the total 2,125 acre-feet runoff from the district (Table 6.27).

Revision of these outfalls is most likely when the Fish and Wildlife Service completes acquisition of this portion of the River Valley and is able to work with the City to locate a new treatment pond or reroute the outfalls to bypass Long Meadow Lake.

33. See response to comment 31.
34. See response to comment 31.

- 35 | 3-11 (Figure 3.5) Map of Existing Land Use is incorrect as shown. Not all of the publicly owned lands are depicted correctly.
- 36 | 3-12 Figure 3.6 does not correctly show the extent of the authorized boundary of the Minnesota Valley National Wildlife Refuge between the I-494 bridge and Appletree Square.
- 37 | 3-13 Figure 3.7 shows the east end of 86th St. (east of Old Shakopee Road) as a "local" road and has two lanes. Figure 3.9 indicates that this section of E. 86th St. is four lanes. This discrepancy should be explained.
- 38 | 3-22 The DEIS does not adequately address the problems that dewatering may create on the springs which feed the Bass Ponds Area.
- 39 | 4-2 Table 4.1 shows that a federal permit has been issued for the stormwater drainage system in the Minnesota Valley Refuge. Additional permits may be necessary to make any proposed modifications to the existing system as suggested in the mitigations section.
- 40 | 5-4 We note and commend the concern expressed regarding the need to provide improved public access to the refuge, recreational area and state trail yet feel opportunities for developing a comprehensive bicycle path network in the District is being overlooked.
- 41 | 5-10 This is the first documentation of plans to extend E 86th St. across the existing natural springs and wooded ravine and to extend E 80th St. east and north to connect with the Post Road. Both of the projects are of tremendous concern to the Fish & Wildlife Service. Even though the DEIS admits that both of these projects are not needed, they are considered by the DEIS to be beneficial. No evaluation of their impacts on the sensitive areas they would infringe upon are discussed.
- The extension of E 86th St. would cross a highly sensitive wooded stream environment, would severely disturb a natural area below the 760' contour, and would cross through a "Conservation" area ant through the proposed "Bluff Protection Zone".
- The east 86th St. extension should not be included in the DEIS for the aforementioned

RESPONSES:

35. The existing land use map is dated 1982. The map depicts the publicly owned lands in January, 1982.
36. It does appear that Figure 3.6 incorrectly defines the refuge boundaries between the I-494 bridge and Appletree Square. However, Figure 3.6 is titled "Relationship to Surrounding Land Uses" and is not intended as a map to depict exact boundaries.
37. Figure 3.9 is incorrect. East 86th Street east of Old Shakopee Road is only two lanes and is classified as a local road.
38. See FEIS Section 2.5 and see response to comment 25.
39. Change was made to Table 4.1. See FEIS Section 2.1.
40. See response to comment 3.

41. The Post Road connector roadway would require approximately 4,000 feet of new roadway construction and the 28th-86th Street connector would require approximately 3,000 feet of new roadway construction. Detailed engineering would be required in order to adequately address the environmental impacts of these projects. They are included in the generic Environmental Impact Statement as "desirable projects for traffic circulation" but not "necessary to relieve vehicular congestion". They are considered in the context, of the overall development of the area, and if they are developed, the recreational and environmental concerns of the U.S. Department of Interior and other agencies will be addressed on a project specific basis.

Bloomington staff has coordinated its initial investigation of the Post Road connector with the U.S. Department of Interior and the Minnesota Department of Natural Resources and will continue to involve these agencies.

- reasons and should require extensive environmental review (none is provided in this DEIS) should this development be considered.
- The Post Road extension would similarly encroach upon the proposed "Bluff Protection Zone" and would require the taking of land included in the refuge boundary. This road would impact greatly the deer migration corridor already restricted by the I-494 construction. This road would also adversely affect the proposed alignment of the authorized Minnesota Valley Trail. The EIS should carefully evaluate the impacts of this highway construction on the Fort Snelling State Park, Minnesota Valley National Wildlife Refuge and the State Trail. We suggest that until and unless both these highway projects can be better evaluated that they be deleted from the EIS.
- 41
- 42 5-13 The Post Road Connector is incorrectly described in the "Description" column. It is an extension of E 80th St. not "south frontage road."
- 6-76 Does the City of Bloomington insure that the oil and grease that collects in the skimmer on Pond "C" and Pond "1" is removed regularly and promptly. Who is responsible for maintenance of these skimmer units?
- 43
- We note the inadequacy of Pond "C" and question if the volume of the pond could be increased by raising the outfall sill to Long Meadow Lake.
- 6-86 No discussion of the proposed E 86th St. extension are included in the DEIS. Clearly this project would have tremendous adverse effects on the bluff springs and the stream which feeds the Bass Ponds. Either the E 86th St. extension should be taken out of the DEIS or this gross omission rectified.
- 44
- 6-91 The bluff face is described as a separating area between the residential and commercial development adjacent the bluff and the broad natural floodplain of the Minnesota River. Much of the development discussed in the DEIS occurs on the bluff and will reduce or eliminate the buffer effect the wooded bluff provides.
- 45
- 6-96 The sentence which concludes section 6.8.1.1 should be modified to change "could" to "would." There is no doubt about the deleterious influence on the aesthetics of the area if development
- 46

RESPONSES:

42. The south I-494 frontage road is being detached to East 80th Street on both sides of 34th Avenue as part of the I-494/TH 5 interchange project. This is shown on Figure 5.2 with dashed lines. The Post Road connector would connect this detached frontage road with the service road on the south side of TH 5 which runs westward from the Post Road interchange. Therefore it was described as an extension of the I-494 south frontage road. In either case the reference is to the same road.
43. The Minnesota Department of Transportation is responsible for maintenance of Pond C. When the storm sewer system draining into Pond 1 is completed, the City of Bloomington will be responsible for maintaining and servicing skimmers.
44. See response to comment 41.

45. This comment presupposes that the bluff will be developed for the most part down to the 760 elevation. If the bluff were developed to its maximum as per the Environmental Impact Statement at least 75 percent of the bluff would remain in its existing "natural" condition. If the bluff were developed behind the browline, as per the Scenic Views and Vistas recommendation, the bluff would remain nearly entirely in its present condition.
46. A change from "could" to "would" is appropriate.

- below the 800' contour is permitted.
- 47 | 6-97 | The discussion section should point out that under alternative #1 32% of the old growth deciduous forest would be eliminated. Under alternative #2 15% of their critical habitat will be lost.
- 48 | 6-98 | The discussion of white-tailed deer omits the important fact that the wooded bluffs are very important to the deer population, particularly during the winter. Any loss of this habitat will significantly impact the deer herd. The DEIS is wrong in concluding otherwise. The authors of this section apparently do not have a clear understanding of the specific habitat requirements of the deer in this portion of the Minnesota Valley.
- 49 | 6-102 | The proposed Post Road extension will greatly impact the deer herd by encroaching on an important migration corridor. The impacts of this project need to be expanded upon in the EIS.
- 50 | 6-102 | The writer of section 6.8.2.2 suggests that there are three explanations for the low number of songbirds killed by striking the tall office buildings in the area yet only two explanations are offered:
- 1.) The buildings are not transparent so birds don't try to fly through them.
 - 2.) The unusual wind turbulence surrounding the buildings whisk the birds away.
- These explanations offered by the buildings groundskeepers fail to adequately address the topic. A more likely explanation for the low number of reported bird collisions is that the caretakers do not find all the birds, either the birds are not found or they are consumed by a predator before discovery. It is likely that songbirds collide with the buildings during night time migration.
- The discussion section is grossly deficient in not recognizing the habitat loss problem and in emphasizing the "wildlife science" offered by two building's groundskeepers.
- Loss of wooded bluff habitat under both alternatives is significant to the particular

RESPONSES:

47. This discussion pertains only to the loss of vegetation types. Loss of old growth deciduous upland forest was described under the discussion of Alternatives 1 and 2. The loss of this vegetation type as it applies to wildlife habitat is discussed on page 6-101.
48. See FEIS Section 2.6.2.

49. Two explanations apply. The paragraph has been revised as follows:

There are two explanations for the low kill rate in this area. The Appletree Square Building is surfaced in copper-colored reflective glass and the Control Data Tower is greyish in color and therefore these buildings do not give the illusion of an open flight path. Because the buildings do not give the illusion of transparency, birds avoid these obstacles.

A second explanation was suggested in conversations with the building superintendents for Control Data and Appletree Square. They noted even on calm days when wind speeds are very low (approximately two miles per hour), measured wind speeds around the taller buildings were as high as fifteen miles per hour, with considerable turbulence. As wind velocities increase so does the turbulence around these buildings. It is quite likely that the birds, with their highly developed ability to detect pressure differentials, can sense this turbulence and avoid the buildings. Furthermore, birds in flight would be swept around the building by the accelerated wind currents.

50

population affected. The EIS must include more detailed discussion of these environmental impacts. We are disappointed by the Wildlife Section of the DEIS and feel a more serious attempt at discussing the complex issues of habitat loss is needed in the EIS.

51

6-126

We question whether the visual impacts of development are honestly revealed by the series of photographs. The photographs containing the artist's conception of alternative #1 development do not show how the tree line in front of the buildings would be eliminated. Are we to believe that trees on the bluff will remain if development is permitted below the 800' elevation? This is exactly what the photographs suggest. Because these photographs are apparently misleading there is no way to accurately judge the DEIS conclusion that there are no adverse impacts on the scenic quality of the area.

52

6-132

Again, Bloomington must accept some responsibility for resolving the difference between the Minnesota Valley National Wildlife Refuge, Recreation Areas and State Trail Comprehensive Plan and the City of Bloomington's Comprehensive Plan. The City is the agent which sets zoning and land use designations, not the present land owner. The City should recognize the wishes of the U.S Congress and to be consistent with other land use designations of the refuge, recreation area and state trail it should re-classify this tract to "Conservation"

53

7-13

Consideration for the development of bike paths should be included in the Travel Demand Management strategies listed.

54

7-35

The EIS should go beyond recommending that certain erosion and sediment controls be used and should develop a mechanism for requiring that the best control mechanisms are used and properly maintained. Those currently being used are woefully inadequate and during recent highway and commercial projects there have been serious problems of erosion down the bluff onto the floodplain or refuge. Developers must not only be required to use erosion control mechanisms but be responsible for damages and corrective action when the controls fail.

55

7-38

We are very concerned that the deficiencies in the present functioning of Pond "C" be corrected

RESPONSES:

50. See FEIS Section 2.6

51. The primary purpose of these illustrations is to show the impact of development alternatives upon the entire view shed. The possible removal of tree cover on the down hill side of a structure on the bluff is speculative for two reasons: 1) the trees from the midpoint down on the bluff are taller than the trees at the top of the bluff since their site conditions are more mesic and the trees have greater age, and 2) the removal of trees below the 800 elevation is restricted by the City of Bloomington and a permit for tree cutting on the bluff is not permitted without a careful case-by-case evaluation.

An additional consideration is that photographic illustrations emphasize the silhouette effect of buildings located above the 800-foot elevation and emphasize the backdrop effect of buildings located down to the 760-foot elevation. The net effect is that photographic illustrations over-represent the visual impact of buildings located above the 800-foot elevation and underrepresent the visual impact of buildings located on the bluff down to the 760-foot elevation.

- 52. See response to comment 31.
- 53. See response to comment 3.
- 54. It is the purpose of the EIS to identify potential impacts and mitigation measures. It is the responsibility of the implementing agencies to act on the recommendations in the EIS and see that mitigation measures are implemented where needed.

55

as soon as possible. The City of Bloomington should examine the possibility of connecting Pond "C" to Pond "1"; the Fish & Wildlife Service is interested in reviewing any proposals for this that the City develops.

56

7-41

The DEIS erroneously understates the impacts of the Airport South District Project on wildlife and wildlife habitat. There will be significant loss of woodland bluff habitat if development alternative #1 is selected. The U.S. Fish & Wildlife Service favors the adoption of development alternative #2 which prohibits development below the 800' elevation.

Mitigation measures described to reduce erosion and sediment problems should be required, not merely recommended.

57

7-45

The recommendations that building materials used below the brow line be of earth tones and that the contrast between the building's exterior color be minimized is in conflict with the DEIS recommendation on page 7-42 for minimizing the chance of bird/building collisions. The EIS should address and resolve this inconsistency.

RESPONSES:

55. See FEIS Section 2.4.
56. The preference of the U.S. Fish and Wildlife Service for adoption of development Alternative #2 is noted.
57. Resolution of this issue is based upon which problem receives higher priority, reduction of bird strikes or reduction of visual impact. It is not the purpose of the Environmental Impact Statement to resolve every issue, but to identify the issues, alternatives and mitigative measures. This has been done.



BOX , CENTENNIAL OFFICE BUILDING • ST. PAUL, MINNESOTA • 55155

DNR INFORMATION
(612) 296-6157

August 31, 1984

FILE NO. _____

Mr. John Pidgeon
City of Bloomington
2215 West Old Shakopee Road
Bloomington, Minnesota 55431



RE: Airport South
Draft Environmental Impact Statement (DEIS)

Dear Mr. Pidgeon:

The Department of Natural Resources (DNR) has reviewed the above-referenced document and we offer the following comments for your consideration.

In general, the DEIS is thorough in addressing the issues related to development of the Airport South District which are of the greatest concern to our Department. However, we feel that some of the discussions of impacts and conclusions are either inaccurate or misleading. Consequently, our comments refer, for the most part, to sections in Chapters 6 and 7 dealing with Vegetation and Wildlife, Scenic Views and Vistas, Park and Recreation Areas, and Conformance with Local and Regional Comprehensive Plans.

Vegetation and Wildlife

We feel that wildlife impacts will be more significant than the DEIS concludes and that proposed mitigation is not adequate to fully offset the potential impacts.

The discussion of impacts on wildlife habitat on pages iii and 6-101 concludes that loss of habitat in Airport South would not be significant because similar habitat exists in abundance elsewhere in the area. This conclusion is very misleading and, in the case of white-tailed deer, inaccurate.

58

The argument on which the conclusion is based could be used to justify any level of development because one can always find other areas with extensive habitat that makes the expected losses seem minor. However the argument is faulty because it fails to consider the carrying capacity of other habitat and the extent to which other habitat will be lost to development. In the case of white-tailed deer, which currently exceed the carrying capacity of the habitat in the Airport South District and nearby areas, loss of habitat will mean additional stress on the population and increased deer depredation and mortality.

AN EQUAL OPPORTUNITY EMPLOYER

RESPONSES:

58. See FEIS Section 2.6.2.

- 58 White-tailed deer populations, which are maintained above the carrying capacity of the habitat by artificial feeding, are very dependent on the mature, bluff forest above Long Meadow Lake. This habitat provides dense protective cover, less snow than the valley bottom because of the southern exposure, and proximity to food sources on the bluffs. Development down to the 760-foot contour would effectively cut off the only reliable travel corridor for deer, especially during flood periods. The fill embankment along the river, mentioned on page 6-100, would not be adequate for deer movement because of deep snow in the winter.
- 59 As mentioned on page 6-100 the loss of old field habitat will impact deer in the area. The DEIS should have expanded on this statement to indicate that the impact will be adverse and to describe the effects on the deer population. The loss of old field habitat should have been described in terms of the percentage of this habitat currently available to deer in the project area that will be lost to development. The development of parcels A, B, E, and F will result in a substantial loss of open feeding areas for a variety of wildlife species.
- 60 The discussion of impacts on pileated woodpecker habitat ends with a misleading conclusion. The sentence should be changed to indicate that loss of mature stands of deciduous hardwoods, as well as over-mature and dying trees, would adversely effect the suitability of the area for this species.
- 61 The discussion of impacts to waterfowl and songbirds on page 6-101 concludes that the major potential impacts to these species will be collisions with buildings. We disagree and believe that loss of habitat is potentially much more significant. Loss of from 86.7 to 89.6 percent of old field habitat and from 14.6 to 31.8 percent of the mature deciduous forest will have a much more significant effect than collisions with buildings.
- 62 The mitigation recommendations presented on pages 7-41 to 7-43 would only minimally offset the adverse impacts resulting from the full development alternative, and particularly from development down to the 760-foot contour. The only measure that we feel would be effective in mitigating the adverse vegetation and wildlife impacts would be to prohibit all development or alterations of the bluff below the 800-foot contour. Even if this measure were implemented, further mitigation would be needed to compensate for the loss of upland old field habitat. We also feel that the DEIS should include discussion of a deer management plan, coordinated with the DNR and the U.S. Fish and Wildlife Service, as a further mitigation measure.
- 63 If the City of Bloomington is unwilling to propose mitigation as we have suggested, then the DEIS should objectively describe the reduction in wildlife populations, increased deer-vehicle collisions, and deer depredation that will occur when the area is fully developed. We feel that the summary statement on pages iii and v, and Sections 6.8 and 7.5 should be revised to reflect our comments and concerns.
- 63 Scenic Views and Vistas
Section 6.10, Scenic Views and Vistas, provides a generally good analysis of the visual impacts of bluff area development. Our major concern with this section

RESPONSES:

59. The sentence will be changed to read as follows:

Loss of mature, over-mature and dying trees would adversely affect the suitability of the Airport South bluff area as habitat for the pileated woodpecker.

60. Section 6.8.2.2 will be revised as follows:

Pg. 6-101 The heading Discussion will be removed. The sentence "Construction of buildings along the bluff is the major potential impact" will be revised to read "Construction of buildings along the bluff is also a potential impact."

Section 6.8.2.2 describes the losses of habitat and the effects on waterfowl and songbirds. The section points out that local populations will be adversely impacted although the changes, except on a site specific basis, will not be detectable. Loss of habitat including the loss of old fields, old growth deciduous upland forest, and brushland is the most significant permanent impact potentially resulting from the implementation of Alternative 1. This habitat is important in the Airport South Development District because of the proximity to the natural habitat of the Minnesota Valley Refuge and the diversity it provides which complements the Valley bottomlands. The species present are those commonly present in other forested areas within the region.

61. In this area loss of permanent old field habitat is not critical. The land area beneath and adjacent to the I-494 bridge will revert to old field cover. The mitigation recommendations in Section 7.5.2.1 (page 7-42) recommend the creation of old field habitat in developed parcels to provide feeding areas for deer and nesting cover for birds. The loss of the old field habitat on top of the bluff may be replaced to some extent by allowing the cultivated fields in the valley bottom to revert to old field. There are 65.8 acres of agricultural field below the 760 foot elevation contour which could be managed by the Fish and Wildlife Service as old field habitat to replace to the extent possible the loss of blufftop old fields. The use of the bottomland old fields would be limited to some extent by periods of deep snow and river flooding.
62. Appropriate revisions have been made. The problem of deer-vehicle collisions and deer depredation is a function of deer herd size. Management responsibility for the size of the herd, and how the population is to be managed and reduced lies, by statute, with the Minnesota Department of Natural Resources. The City of Bloomington recognizes the potential for wildlife problems in an area where a natural area lies adjacent to a developing/developed area and is willing to coordinate with the resource management agencies in solving the problem.

is that Figures 6.39, 6.40 and 6.41 provide a misleading impression of the visibility of structures built below the 800-foot contour on the bluff.

These illustrations show buildings built down to 760 feet mostly concealed behind a tree line that would no longer exist if the structures were built. The top of the tree line in front of these structures would be much further down the bluff, so that most of the building fronts would be exposed. We feel that these illustrations give the reader the false impression that alternative 1 structures would be much less visible from the river valley than alternative 2 structures.

63

If the intent of the illustrations is to show the difference in building height above the bluff between the two alternatives, then silhouette drawings would be more appropriate. If an objective of the illustrations is to show vegetative screening, then the tree line in front of the buildings on the bluff face should be corrected. This correction would also serve to illustrate the visual intrusion impact that is described in the text and give the reader a better idea of the relative impacts of the two alternatives.

64

We believe that the mitigation measures described on page 7-44 would only partially offset the visual intrusion of development on the bluff face. As the first paragraph in Section 7.7 states, the most effective measure for reducing visual intrusion into the high recreational use areas is to keep structures behind the bluff browline.

65

Park and Recreation Areas

Our Department is concerned about the potential impacts of the Post Road Connector on a trail and camping area planned for the area where the road would go. We think that both the recreational and traffic needs can be met, but that close cooperation is needed between traffic engineers and recreation planners. We would appreciate the opportunity to provide input to the roadway design process.

66

Consistency with Adopted Local and Regional Comprehensive Plans

Section 6.12.3 generally understates the inconsistencies between the Comprehensive Plan for the Minnesota Valley National Wildlife Refuge and Recreation Area and the City of Bloomington's plans for development of the Airport South District. The degree to which bluff face development is allowed is a major difference between the two plans. This should be openly acknowledged in the DEIS, not reported as an "item of discussion" and then dismissed as is done on page 6-132.

The concerns that we have expressed earlier in this letter are relevant to this issue. It is more than controversy over whether or not the Northwest Airlines property should be developed. The City of Bloomington has had a role in the Northwest Airlines property debate by making changes in the city's comprehensive plan to allow development of the site. Likewise, the city has a very pivotal role to play in deciding whether or not future development of the Airport South District is consistent with the refuge and recreation area objective to protect the bluff face.

RESPONSES:

63. See response to comment 51.

64. No standards exist for the measurement of mitigating visual intrusion. The measures outlined on page 7-44 of the DEIS have been adopted as part of Bloomington's Comprehensive Plan and Zoning Ordinance. These are the most stringent municipal standards in the state to be applied to private property adjoining a wildlife area. As stated the most effective measure for reducing visual intrusion into the valley is to locate a building behind the browline and this remains a viable alternative.

65. The City of Bloomington is committed to coordinating roadway design with all governmental units interested in a project and will pursue coordination of the Post Road connector with the Department of Natural Resources.

66. The only inconsistency between the Environmental Impact Statement (Airport South District Land Use Plan) and the Minnesota Valley National Wildlife Refuge Plan within the boundary of the refuge is the classification of the Northwest Airlines site. This discussion is entirely academic if the U.S. Department of Interior acquires this parcel from Northwest Airlines.

With regard to the inconsistency issue, comprehensive planning and zoning is an exercise of local police power. Neither the Federal or State government have the authority to require Bloomington to change its plan or zoning. Furthermore, the property in question was designated in the land use plan and zoned for commercial use prior to the adoption of the Minnesota Valley National Wildlife Refuge Plan.

With regard to bluff development and its relationship to the refuge, both the Minnesota Department of Natural Resources and the United States Department of Interior have been closely involved in the development of the City's Bluff Ordinances and they have been repeatedly informed if they wish greater bluff protection they may acquire scenic easements from private property owners.

- 67 | The first paragraph of this section should also be amended to show that the refuge and recreation area acreage is 12,235, not 20,000+.

Other Concerns

- 68 | The DEIS indicates on page 6-86 that a permanent dewatering system will be required in the vicinity of the Cedar Avenue - Killebrew Drive intersection. Such a system will require a DNR water appropriation permit. This requirement should be indicated in Section 4.0 of the DEIS.

We appreciate the attention that you have paid to our Department's concerns during the development of this document. We feel that the differences between our respective viewpoints on bluff development have been addressed to some degree, but that a more objective discussion of those differences is needed. We believe it is in both of our best interests to retain the bluff face as an undisturbed buffer between the intensively developed upland area of Airport South and the natural, floodplain habitat and recreation area. We believe that these two sharply contrasting land uses can coexist, but that they should not mix. We hope you will find our comments helpful in revising the document.

Sincerely,

Thomas W. Balcom
Thomas W. Balcom
Environmental Review Coordinator

pje 55

c: Karen Loechler
Vonny Hagen
Kent Lokkesmoe
Earl Huber
Ron Harnack
Milt Krona
Tim Kelly
Ed Crozier - U.S. Fish and Wildlife Service
Gregg Downing - EOB✓
Richard Wolsfeld - BRW, Inc.

RESPONSES:

67. Correction noted.
68. Table 4.1 has been changed to indicate the need for a DNR water appropriation permit.

Friends of the



Box 20244
Bloomington, MN
55420

**Honorary
Board of Directors**

Elmer L. Andersen
Roseville, Minnesota

Raymond Black
Minneapolis, Minnesota

Dr. Walter Breckenridge
Minneapolis, Minnesota

Forrest A. Carpenter
Prior Lake, Minnesota

Horace F. Chamberlain
LeSueur, Minnesota

Wallace C. Dayton
Minneapolis, Minnesota

Dr. Adela Skipton Elwell
Bemidji, Minnesota

The Honorable Bill Frenzel
Washington, D. C.

Robert L. Herbst
Vienna, Virginia

Shirley K. Hunt
Edina, Minnesota

James E. Kelley
Bloomington, Minnesota

Charles M. Moos
Minneapolis, Minnesota

Samuel H. Morgan
St. Paul, Minnesota

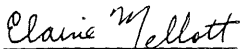
August 23, 1984

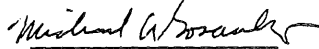
Environmental Quality Board
State of Minnesota
c/o Mr. Grey Downing
Room 100 Capital Square Building
550 Cedar Street
St. Paul, MN 55101

Gentlemen:

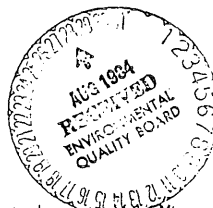
Please find attachments for the "Friends" letter of August 20, 1984 enclosed. This details our concerns about the Airport South District D.E.I.S.

Sincerely,


Elaine Mellott
Chairman


Mike Bosanko
Vice-Chairman

0912d



Working to conserve and manage wisely the cultural and natural resources of the Minnesota Valley.

Specific Concerns:

- 69 | What are the plans to meet state noise levels regulations south of Old Shakopee Road?
- 70 | pp iii - last sentence - significant needs to be defined since no statistics are presented, as to the expected permanency or quality of the habitats in other parts of the metro area, the quality of habitat changes is not dealt with and changes in the species and diversity of species is not addressed. Also there is no answer to the question as to how bluff development will impact the long term migratory and winter use of the bluff, marsh and river area by bald eagles, an endangered species.
- 71 | 2-2 #2 - The proposed alternate review system for project specific environmental reviews in the Airport South District is not adequately described in the D.E.I.S. It needs to be in order to evaluate the complete process.
- 72 | 5.1.1 - Consideration should be given to limiting construction permit approval periods to two years because of the lack of information of the impact of changes on the area subsequent to that.
- 73 | 5-2 - What are positive and negative travel management incentives - they need to be defined.
- 74 | 5-3 #7 line 4 - "Appropriate mitigation measures" need to be defined.
- 75 | Table 5-4 15A - Seems to allow road construction anywhere an agency chooses - limits and criteria need to be established.
- 76 | 5-6 - We appreciate development sub-alternative data to assess development down to the 760' and up to the 800' river bluff elevations.
- 77 | Noise 6-47 - We feel great concern over the fact that the D.E.I.S. plan facilitates changes in aircraft and auto noise levels far above what was expected when the Refuge was approved in 1976 and that the changes in aircraft take off routes are diminishing the values of this prime education area and wildlife facility. Freeway noise barriers on TH77 bridge and approaches are needed.
- Airports - "Structure performance standards adapted to mitigate aircraft noise". Why bother with windows and residential units. Who wants to live in Bloomington where they can't have open windows?

* Note 1983 eagle sighting data attached.

RESPONSES:

69. Along East Old Shakopee Road, no noise mitigation measures appear feasible or warranted due to the small increase in future noise levels over existing. No violations of state daytime noise standards were forecast and violations of state nighttime noise standards were limited to residential properties adjacent to East Old Shakopee Road between Killebrew Drive and the TH 77 interchange during two of the nine nighttime hours.
70. The last sentence specifically pertains to old field habitat. Also, see FEIS Section 2.6 and responses to the Department of Natural Resources letter. The Vegetation and Wildlife Technical Report (Appendix 9.7) presents lists of species currently present and those present under urbanized conditions. Reductions in absolute numbers of species present is a result along with some changes to species that are subjectively rated as less desirable.
71. The details of the alternative review process are still under review with the Minnesota Environmental Quality Board. The City of Bloomington has adopted the model environmental review ordinance contained in 6 MCAR 3.035; it is likely that the procedures in this model ordinance will be part of the alternative review process.

72. The conditions governing validity of construction permits issued by the City is described in Section 303(d) of the Uniform Building code. This section provides that a construction permit expires in 180 days, if work authorized by the permit is not commenced, is suspended or abandoned. The code provides for an additional 180-day extension upon the permittee's written request.
73. We do not find these terms used on page 5-2. The reference may be to the text explaining the travel demand management policy which states, "These travel demand management techniques will only be successful through positive incentives to encourage their use, and disincentives to the use of single occupant vehicles." Section 7.1.2 describes possible travel demand management techniques in detail.
74. The location referenced is one of seven general policies for conduct of the study. Section 7 of this report titled "Mitigation Measures" is a discussion of all feasible mitigation measures.
75. Table 5.4 (which should be labeled as 5.1) identifies goals, objectives and evaluation criteria which were used along with the policies on pages 5-1 through 5-3 in developing and evaluating the transportation plan for the Airport South District. These goals, objectives and evaluation criteria as well as the policies were developed early in the study process by the Project Management Team and were reviewed and approved by all of the study participants. Parklands were specifically identified as a critical area which should be avoided. However, the fact that other critical areas were not identified does not allow road construction anywhere an agency chooses.
76. No response needed.
77. As stated in the DEIS (p. 6-48), development in the Airport South District will not change aircraft operations at the Minneapolis-St. Paul International Airport. While it is true that the modified departure track from runway 04/22 (p. 6-55) would result in increased noise in the river valley, the Airport South development has no direct bearing on the decision to adopt the modified departure track. Aircraft noise will continue to impact the Minnesota River valley regardless of the development of the Airport South District.

Structures so built will encourage increased airport traffic over this area to the detriment of existing buildings both residential and non-residential. Nothing is discussed of the impact this will have on wildlife in the Refuge area. It is unnatural for them to experience and perhaps will be deadly to wildlife dependent on their hearing to find food. Work should be done to compare aircraft noise effects on wildlife versus a similar non-impact area at the west end of the Refuge.

77

Monitoring of noise levels should have been done at several sites within the Refuge, as was done at other sites in the Airport South District. This monitoring is all the more important as the change in the departure track from runway 04/22 (ref: 6-53) has placed most of the Refuge area in noise zones 3 and 4 (described as "significant" and "moderate"), a change which may be adopted by the FAA. To point out that people and wildlife who enjoy or live in the natural setting of the Minnesota River Valley cannot protect themselves from high noise levels by placing themselves within relatively noise-free buildings is to state the obvious. Mitigation measures should be proposed which will lessen or eliminate the impact of aircraft noise on recreational visitors and wildlife within the valley.

Air Quality page 6-31 - We feel that current and on-going air quality and noise monitoring also should be done at several points within the wildlife Refuge.

78

Although the air quality analysis of carbon monoxide concentration appears to be thorough and the conclusion that predicted CO concentrations will not violate state ambient air quality standards is reassuring, we again raise the question of why the cumulative effects of hydrocarbons, nitrogen oxides, particulates and lead were not analyzed. Surely auto emissions will not be the only source of air pollution resulting from future development. Although pollution from air traffic at the International Airport is said not to be the result of development within the district, it should be measured, and the amounts of such pollution be taken into account when predicting future levels of air pollution, just as the levels of aircraft noise were monitored and predicted in the sections on noise (6.3). It is inconsistent to measure the noise levels generated by air traffic, but not air pollution levels generated by the same source.

RESPONSES:

78. See response to Comment 21.

- 78 Does the city only care about noise level violations or does the general character of the impact of auto and aircraft traffic noise on the Refuge matter?
- 79 6-37 - It is noted that if bluff development occurs as planned down to and below the 760' contour that 15 to 32% of the woodland area and 3.6% of the brushland area will be developed. These percentages seem very significant and they are important to area wildlife and residents in terms of wildlife survival in those lands and on the Refuge.
- 80 White-tailed Deer - How many deer can survive in the D.E.I.S. area after development? It should also be noted that current 494 construction east of the 24th Avenue has destroyed significant wildlife habitat. How many other animals and what kinds of wildlife will die as a result of the proposed development? pp 6-100 - define "not expected to significantly impact deer survival".
- 81 6-72 - Table 6.27 - The fact that chloride levels continue to increase over time is a major concern - how can this be mitigated and who will be responsible for it? (Note 15% increase).
- 82 6-76 - It appears that water pollution treatment during construction will be ineffective which is of grave concern - does the city not want understand how elevation of the pollutants is to be contained and do that.
- 83 6-88 - It is of grave concern that the city plans that the high level springs will probably become dry due to construction impacts on ground water movement and that the ravine ecosystem will likely be destroyed due to lack of the high springs flow.
- Concerns
- 84 6.5.4 page 6-76 - Stormwater from watersheds, Old Shakopee Road, 80th Street and Bluffs, will enter Long Meadow Lake receiving no treatment. We request that treatment occur. Water from shed 22 will flow into Pond "C" and then into Long Meadow Lake. During periods of high volume of runoff, water could actually flush water and solids out of Pond "C" into Long Meadow Lake depending on the amount of maintenance performed on the central structure. There is no clearly defined responsibility on the city to perform the maintenance or how they might do it.

RESPONSES:

79. See FEIS Section 2.6.
80. See FEIS Section 2.6.2.
81. Chloride loadings are a function of the parking lot and roadway area that is in use within the watershed. Therefore, as the Airport South District is developed; and more land is devoted to parking lots and roadways; and as traffic levels increase, an increase in the chloride loadings is expected. Erosion control measures will have little affect on the loadings of chloride. However, reducing surface runoff through infiltration techniques or providing a combined Pond 1-Pond C treatment system would mitigate the chloride loadings to Long Meadow Lake. On-site mitigation such as infiltration systems or on-site ponding could be required during site plan approval. Providing off-site treatment basins would require coordination with state and federal agencies.

82. The paragraph referred to is a description of the potential impact if "only limited erosion control practices were employed." In other words, this is a description of a worst-case analysis. It is true that if only minimal erosion control is used during construction, pollutant loadings and in particular suspended solid loadings to Long Meadow Lake can be expected to increase significantly. Section 7.4.2 describes measures which can be implemented to effectively reduce water quality impacts caused by run-off from construction sites. Table 6.29 was revised to show the expected loadings during construction assuming extensive erosion control. See Table 2.4 page 10 of FEIS.
83. The City of Bloomington does not plan to dry up the upper level springs along the bluff. See FEIS Section 2.5. See response to comment 25.
84. See FEIS Section 2.4.

- 85 | 6.5.4 page 6-79 - Holding Pond 1 - plan describes a 13.5 acre wetland as part of the water treatment plan and is used in calculating the effectivity of Pond 1. This results in Pond 1 being considered as much more effective in removing the solids and nutrients from the water than it should be.
- 86 | 6.8 - Vegetation and wildlife.
6-91 - Is the area referred to in paragraph 5 last sentence Control Data property? It does not appear to be identified in a category in the text.
- 87 | 6.8.1.1 - Alternative 1 - we support development only above the 800' contour on parcels A and B. The ravine should be conserved.
- 88 | 6.8.1.3 - Discussion - where else in Bloomington and the Minnesota Valley is it expected that old pastures and open fields will remain available to wildlife for any substantial period of time? What is that time?
- 89 | 6.8.2 - Wildlife #3 - What is viable population of a given species?
6.8.2.1 - The most critical issue is species survival. The second most critical issue is as stated.
- 90 | 6.8.3.2 - Animals - Bald Eagle
6-103 - Provision for ongoing use of the bluff, Long Meadow Lake and Black Dog Power Plant by wintering and migratory bald eagles (a threatened species) should be made. The impact of the bluff development and the test and proposed TH77 aircraft corridor landings and take-offs on runways 4 and 22 on eagle activity must be evaluated and the eagle's use protected. No response to EAW Question 26b is included in the D.E.I.S. as requested by the U.S.F.W.S. 1983 eagle observation data is attached. We want the eagles to continue use of the area. They can only if we manage for that.
- 91 | 7.5 - Mitigation - Landscape designs should include species selected for their food and nesting habitat value for songbirds.
7.5.3.1 - Rare, threatened and endangered species - how will the recommendations in this section be enforced and who will enforce them?

RESPONSES:

85. The Pond 1 treatment basin was designed so that water from Pond 1 would flow through the 13.5 acre wetland prior to emptying into Long Meadow Lake. The system was designed in this manner because wetlands are very effective in removing nutrients from the water while most of the solids would be settled out in the holding pond. Since the system was designed to utilize the wetlands for nutrient removal it is only reasonable to assume this in the analysis.
86. The area is Control Data property.
87. The preference for Development Alternative 1 on Parcels A and B is noted. A development proposal for Parcel A presently being considered for approval by the City of Bloomington does not propose any development below the 800 foot elevation contour.

88. Open fields are part of the Fort Snelling State Park management plan as well as for management units within the Minnesota Valley Refuge, Recreation Area and State Trail. Hundreds of acres of prairie and oak savanna are preserved in the Hyland Lake unit of the park reserve. Prairie preservation and restoration is a primary function of the Hyland Lake Unit and this prairie will be preserved permanently. Other conservation areas within Bloomington preserve hundreds of acres of old field, marsh and meadow grasses. The mitigation recommendations also call for incorporating old field habitat into the development design of parcels adjacent to the bluff.
89. A viable population is the minimum number of individuals of a given species required to ensure the continued presence of the species in suitable habitat so that the species is not extirpated. The absolute number will vary from one species to another and from one locality to another. In the case of the Airport South project the continued survival of populations of species was not threatened. Individuals within populations will be lost and populations of some species depending on old growth deciduous forests will be reduced. This reduction will not, however, result in the extirpation or extinction of any species in the Minneapolis-St. Paul Area.
90. See FEIS Section 2.6.3.
91. Nesting habitat is generally not a problem in large scale landscaping projects. The selection of those species having food value to songbirds is often overlooked, however. No mechanism is now identified for incorporating plant inventories into development reviews. Development in the Airport South area with permanent zoning requires final site and building plan approval. Implementation of the CO-1 and RO-50 rezoning along the bluff would establish a review procedure which presently does not exist.

- 92 | 6-10 - Scenic Views and Vistas - Comments relating to the harmonious man-made elements and color contrast (6-113) as opposed to the remarks about the south bluff appear inconsistent and subjective. The D.E.I.S. is concerned with the view from the Minnesota River Valley as it relates to the Airport South District.
- 93 | Figure 6-39 - The view from Minnesota Valley state trail is misleading. Removal of the mature vegetation is not shown and would be extensive if development is allowed to the 760' contour. This would effect not only the vista but wildlife habitat. Development would impact adversely Refuge user's experience of the wildlife Refuge.
- 94 | 6-120 last paragraph - What does this mean?
6-126 - 2nd paragraph, last sentence - why not give people a pleasant view? The last sentence of scenic views and vistas is a subjective statement of rationale when there are supposed to be two mitigative measures to be dealt with and at this point in time no determination of the preferred measure.
- 95 | 6-12 and page 6-131 - Fully developed area policy. Is there any certainty that the Kelley property will be developed? Rather a broad statement without facts to document.
- 96 | Historic and archeological resources page 7-43-44 - Mitigation Section 7-43, 44 - Do "appropriate management measures" that are pursuant to state laws and regulations require the notification and approval of appropriate Indian tribal authorities before excavation and earth-moving activities occur, since burial mounds constitute a sacred and holy area in the Indian culture? Is there a permit requirement here?

0903d

RESPONSES:

92. Visual analysis is a subjective matter. The attempt was made to apply subjective criteria in a consistent manner. The Environmental Impact Statement does direct its visual analysis to the view of the Airport South area, but this requires a discussion of the context of a viewer, hence the discussion of the south bluff.
93. See responses to comment 51.
94. The U.S. Department of Interior and the Minnesota Department of Natural Resources prefer buildings to be built at the top of the bluff or behind the browline rather than on the bluff. The Scenic Views and Vistas section is subjective by its very nature, but it does note that locating development off the bluff has the least intrusion into the river valley.
95. The Fully Developed Policy Area is a Metropolitan Council description of a majority of the urbanized metropolitan area. Within this policy area the general character will be that of a substantially developed area, but it does not guarantee that any given parcel will develop.

96. In areas of archaeological probability in which there are existing or destroyed mound groups, the City will contact the State Archeologist's Office for a determination of the exact location of the prehistoric site. The State Archaeologist Office will contact the Indian Affairs Council concerning any archaeological testing or surveying or excavation or earth-moving within the immediate site area. This procedural activity is basically required by law. Any work on a mound would require a permit from the State Archaeologist's Office.

The burial mounds are protected by MN Stat. 307.08 which prohibits the disturbance of burial mounds by anyone including persons engaged in archeological research. Development of the sites is not prohibited. Prior to any anticipated disturbance the Minnesota Indian Affairs Intertribal Board must be contacted. The Minnesota Historical Society should be a participant in any discussions with the Intertribal Board to plan for the relocation of any remains to appropriate burial grounds. Notification of the Archeologists Office at the Minnesota Historical Society will expedite the site evaluation process and the relocation of any remains.

*Eagles seen at Black Dog

Competent birders are needed for this year's Christmas Bird Count

by Karol Gresser

Hungry hawks and owls were numerous in the Minnesota River Valley the past two weeks. Most unusual was the great grey owl seen for a week in the Prior Lake area and then found dead Dec. 10.

Malnutrition may have been the cause of death as is often the case for northern owl species driven south by the scarcity of rodents in deep snow.

At least three adult bald eagles have been on the river near Black Dog Lake and other eagle reports were from Hyland Park, Bloomington, and one flying over the Burnsville Center.

Red-tailed and rough-legged hawks, kestrel and an adult goshawk were seen between Cedar Avenue and I-35W along the river. Kestrel, sharp-shinned hawk and great horned owl were seen in Bloomington.

Other carnivorous birds seen were three glaucous gulls and a Thayer's gull among many herring gulls on Black Dog Lake and a northern shrike at Fort Snelling. The gulls feed at dumps from Pine Bend to Burnsville and will stay around as long as open water is available.

A species to watch for is the Bohemian waxwing since 125 were reported at O'Brien State Park north of Stillwater in Washington County. They seem to be moving south in large flocks this year. These unpredictable winter visitors are sometimes found mixed in with cedar waxwings.

In spite of the cold temperatures, a Harris' sparrow and an immature white-crowned sparrow are coming daily to our feeder. We're hoping to keep them around for the annual Christmas Bird Count.

The count compiled by the Minnesota River Valley Audubon Club will be conducted January 1, and competent birders are needed to cover areas in Bloomington, Eagan and Burnsville.

Contact Tom Bloom, 825-7175 evenings for information. National Audubon Society issues the rules for hundreds of bird counts taken during a two-week period from Alaska to South America. Results are published annual in *American Birds* magazine.

Karol Gresser and her husband Jerry were featured in *The Minneapolis Star and Tribune's Outdoor Section*, Sunday, Dec. 18. Gresser is a member of the *Minnesota Ornithologists Union* and the *Minnesota River Valley Audubon Club*. Her columns appear fortnightly in this newspaper. She lives in Burnsville.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE MATTER OF SOUTH AIRPORT
PUBLIC MEETING

DRAFT GENERIC ENVIRONMENTAL
IMPACT STATEMENT

The above-entitled matter came duly on for
hearing on the 21st day of August, 1984, at the Bloomington City
Hall, Bloomington, Minnesota, commencing at 7 p.m.

1 APPEARANCES:

2 GREG DOWNING, of the Environmental Quality Board,
3 100 Capital Square Building, 550 Cedar, St. Paul,
4 Minnesota 55101.

5 TOM RULLAND, Manager, Policy Analysis and Review,
6 Minnesota Environmental Quality Board, 100 Capitol
7 Square Building, 550 Cedar Street, St. Paul,
8 Minnesota 55101.

9 Also present: Dick Wolsfeld, Project Manager.

10 * * *

11
12 WHEREUPON, the following proceedings were duly had:

13 * * *

14
15 MR. RULLAND: Let's call the meeting to order
16 My name is Tom Rulland. I am with the State Plannin
17 Agency and I am the Chair at tonight's public meet-
18 ing.

19 Along with me is Greg Downing who is the
20 Coordinator of the State's Environmental Review
21 Program for the Minnesota Environmental Quality
22 Board.

23 The purpose of tonight's meeting is to take
24 comments on the Draft Environmental Impact State-
25

1 ment which has been prepared for the Airport South
2 District of the City of Bloomington.

3 A Draft Environmental Impact Statement has
4 been prepared. It has been circulated. I hope
5 everyone has had an opportunity to take a look at
6 it.

7 As I say, the purpose of tonight's meeting
8 is to take comments related to information contained
9 in the draft environmental impact statement or
10 directed toward comments toward items that are not
11 in the statement that people feel should be.

12 If possible and if appropriate, we have
13 representatives from the City of Bloomington and
14 Met Council and the consulting firm that prepared
15 the draft impact statement and they will attempt
16 to respond to questions, as appropriate. We don't
17 want to get drawn into some long discussions because
18 we are just trying to raise comments now. All
19 comments will be responded to, all reasonable
20 comments will be responded to when the final
21 impact statement is prepared.

22 Just a word of background on the draft
23 impact statement for airport south district. It
24 came about at the request of the City of Bloomington
25 and Metropolitan Council to address the impacts

1 applicable to certain levels of development in the
2 district area. The Environmental Quality Board
3 has a provision in its rules, 6MCAR, Section 3.036
4 which provides that the EQB can direct the prepara-
5 tion of a generic EIS for certain instances and the
6 case of the Bloomington airport south district,
7 they met the requirements and so the EQB, at the
8 request of the City of Bloomington, directed that
9 the impact statement be prepared.

10 As you probably have noticed, we have a
11 court reporter who will be transcribing all the
12 remarks that you have this evening. Please, when
13 you are to speak, identify yourself and spell
14 your name out, if it a complicated name. When
15 directing comments toward the map or chart,
16 verbalize what you are saying. Don't say, over
17 here, as indicated in this part of the map.
18 That doesn't do any good to the people when they
19 are going back and reviewing the record. Identify
20 such and such a map and spell out as specific as
21 you can.

22 Subsequent to tonight's meeting, as I men-
23 tioned, the comments that will be given tonight
24 will be responded to in preparation of the final
25 impact statement. I believe Greg Downing has the

1 dates for which the record will remain open and for
2 when it is anticipated the Environmental Quality
3 Board will review it.

4 MR. DOWNING: Thank you, Tom. The first
5 date to be aware of is for the comment period, for
6 written comments, runs through September 5. Then,
7 after that time, the draft document will be put
8 into final form to the response to the comments.
9 We are anticipating a final EIS document will be
10 ready approximately the 15th of October and we are
11 anticipating that the Environmental Quality Board
12 will act on that document and decide adequate or
13 inadequate on the 15th of November. If anybody
14 supplies comments on the draft, when you see the
15 final, if you feel the comments are not responded
16 to, you have the recourse of going to the Environ-
17 mental Quality Board meeting and making your petition
18 known.

19 MR. RULLAND: Because we have a small group
20 here, I can identify about 8 people who are not
21 connected with the draft EIS in some form, either
22 project management team or its preparation. I would
23 like to operate really informally. We will take
24 first come, first serve in terms of people who want
25 to make comments. Before we do take those comments,

1 Dick Wolsfeld, one of the principal preparers of
2 the draft impact statement has volunteered to
3 describe the project area and what's all involved,
4 various impacts, what have you. Dick.

5 MR. WOLSFELD: The study area for airport
6 south is bounded by 494 on the north, by Cedar
7 Avenue on the west; by the Minnesota River on the
8 south and east. Presently, there is about 3.2
9 million square feet of commercial development in
10 the area that's primarily composed of offices.
11 There is 975 dwelling units; and just over 2,000
12 hotel rooms today. It's 3.2 million square feet
13 of office; 1,000 dwelling units and 2,000 motel
14 rooms. The proposed increment of development,
15 additional development expected in the area is
16 an additional 4.2 million square feet of office;
17 900,000 square foot retail complex and additional
18 2300 dwelling units and an additional 2500 hotel-
19 motel units so that's the increment of development
20 that's proposed within the project. Our charge
21 was to identify the environmental impacts of that
22 proposed development, not only within this primary
23 study area, but also within a secondary area which
24 is about a mile to a mile and a half in addition to
25 that primary study area and we did that analysis in

1 a 2-step process. For the first process, was
2 called a scoping process where in July of 1983,
3 there was a scoping document prepared; there was
4 a public meeting and testimony was taken as to
5 what issues should be analyzed and studied for
6 that proposed project and on the basis of that,
7 the Environmental Quality Board determined there
8 were various issues that were to be studied and
9 documented in the Environmental Impact Statement
10 which has now been completed and is reported in
11 this document.

12 What I would like to do next is to briefly
13 summarize the major impacts in the area and we
14 can answer any questions on some of the other
15 impacts. The primary impact area that was
16 analyzed was that of transportation. The question
17 of the ability of the existing street system to
18 accommodate the additional development associated
19 with that project that I talked about. We did
20 a couple of things. First, we defined transporta-
21 tion alternatives to service the area. One area
22 we focused on a great deal was the Cedar Avenue
23 area between 494 and 86th Street which is down
24 here. We held a series of neighborhood meetings.
25 We appeared in front of the City Council and I

1 think we looked at some 24 of 25 different alterna-
2 tives to address the roadway improvement on the
3 Cedar Avenue project. This is the alternative
4 that is currently, preferred alternative to
5 provide access to the airport south area.

6 I will spend a second on the project. The
7 project really starts at the western curb line of
8 the existing westerly frontage road. No
9 right-of-way acquisition exists on the west side
10 of Cedar; all the right-of-way is taken from the
11 old Metropolitan Stadium site. There is an
12 interchange at Killebrew to allow southbound
13 vehicles to exist and have access to the property
14 and similarly for people who want to go southbound
15 on Cedar, they can exit the property. We have
16 also added a loop off of exiting southbound traffic
17 on Cedar, commonly referred to as a Texas turn
18 which provides direct access into the site.
19 We have also provided a return to allow people
20 to exit from the site and access Cedar and head
21 in a northbound direction. Another feature of
22 this improvement is to make 79th Street continuous
23 from the west to the east side of Cedar where it
24 presently is not continuous today and that would go
25 down underneath Cedar Avenue and connect the

1 east and west sides of land on either side of
2 Bloomington in this particular area. This is the
3 proposed improvement to Cedar Avenue. There is
4 also proposed improvement at 24th Avenue which
5 would detatch the frontage road and remove them
6 and add 2 additional exits; 3 additional lanes
7 across 494, left turn lane and 2 through lanes.
8 Those are 2 of the major transportation improve-
9 ments within the area.

10 In addition, we also looked at the ability
11 of 494 to accommodate that development traffic.
12 One of the transportation constraints that we used
13 on the project is the existing 6 lane segment of
14 494 would continue to be in existence throughout
15 the 20 year planning horizon that we had.

16 The conclusion of that analysis was that 494
17 is not capable of accommodating the traffic associated
18 with the development in the airport south and also
19 accommodate expected increases in the background
20 traffic with the continuation of that as a 6 lane
21 roadway. We would expect traffic operational
22 problems on 494 with its present geometrics.
23 This graphic shows that problem -- this is time
24 across the bottom and this is the travel demand
25 on the "Y" axis and you can see as the traffic would

1 grow over time, somewhere in the 1990's the
2 capacity or the capability of 494 would be reached.
3 If we implement some travel demand management
4 strategies, car pooling, van pooling; increased
5 bus service; stagger work hours, we can extend
6 the life of 494 in the neighborhood of 3, 4, 5
7 years. With the increase in background traffic,
8 plus the traffic associated with the airport south,
9 we would exceed the traffic carrying capabilities
10 of 494 in the 1990's.

11 The draft environmental impact statement
12 identifies a series of potential mitigation measures
13 to resolve that problem; one would be metered
14 freeway which would increase the capacity somewhat.
15 Another would be to add an additional lane in each
16 direction which would resolve the issue. Another
17 one would be to try to attempt to control the
18 amount of land developed in airport south. Other
19 options to go into the entire 494 travelshed
20 and either try to encourage additional travel
21 management strategies or to attempt to control
22 land use in order to reduce the amount of vehicles
23 on the facility during the peak hours. The sixth
24 mitigation measure would be simply to live with
25 the congestion.

KIRBY A. KENNEDY & ASSOCIATES
PHONE: (612) 922-1955

411 EDINA EXECUTIVE OFFICE PLAZA
5200 WILLSON ROAD
MINNEAPOLIS, MINNESOTA 55424

HEARING ROOM AVAILABLE
ST. PAUL, MINNESOTA

1 Two other areas of significant analysis
2 was air quality and noise. We would not violate
3 any state or federal air quality standards even
4 with the increased traffic on 494 with the full
5 development associated with the project. There
6 would be some increases in the 1 hour concentration,
7 but the increases would be below the 30 parts per
8 million for carbon monoxide which is the state
9 standard.

10 Relative to noise, there are state day time
11 standards and state night time standards for noise.
12 Presently, Cedar Avenue, the residential properties
13 along the west side of Cedar, we took noise read-
14 ings out there. Presently, that area is in viola-
15 tion of state law. The plan is to lower the
16 main line of Cedar about 20 feet through this area,
17 even though there would be a reduction in the noise
18 levels at those selected residential properties, it
19 still is in excess of the existing state day time
20 and night time noise standards.

21 Some of the mitigation measures for that,
22 we can build a noise wall along the west side of
23 the facility, a 14 foot high noise wall, will
24 mitigate the state day time standard relative to
25 residential properties. You would still have viola-

1 tion of night time standards. The other alterna-
2 tive. Obviously, you can talk about a change in
3 land use from residential to something else which
4 would mitigate the problem. That is a concern.

5 Other areas that were analyzed, let me just
6 go over them. Waste water; surface water; ground
7 water; district heating; vegetation and wildlife;
8 historic and archeological resources; scenic
9 views and vistas; park and recreational areas;
10 conformance with local and regional comprehensive
11 plans; economic impact and sociological impacts.
12 Of all of those, we think there are 3 areas of un-
13 resolved issues and that is the issue of 494 in
14 terms of traffic impact. Secondly, the funding
15 of the transportation improvement on Cedar Avenue
16 is still being discussed and thirdly, is that
17 noise issue where we are in violation of state day
18 time and night time standards relative to the
19 project.

20 That's kind of a capsule of the program.
21 I would be happy to answer questions or I think we
22 are ready to have the solicitor listen to comments.

23 MR. RULLAND: Does anybody have questions in
24 terms of what was done, differentiate between
25 questions and comments on the applicability of the

1 adequacy of the document and the information.

2 Then, at this time, what we would like to do
3 is receive comments on the draft EIS.

4 MR. CORBETT: I am wondering about Cedar
5 Avenue by Killebrew Drive. I am wondering when
6 they are going to get around to put that viaduct
7 or whatever they call it on Killebrew Drive to
8 make the turn.

9 MR. WOLSFELD: You live right here. The
10 first house north of the apartments, which will be
11 an extension of 83rd Street and the west frontage,
12 right?

13 MR. CORBETT: That's right. I want to find
14 out when they come this way. When them sand trucks
15 go back and forth now for the last 3 years. I don't
16 where they move them, Golden Valley to Minneapolis
17 or what, they are going all the time. They have
18 to stop there at the stop sign and every time they
19 start out you can see a cloud of exhaust going up
20 in the air. Then right up in here where they
21 build all the office places on the other side of
22 82nd. In the evening when they go home, we can't
23 even get out of our driveway. They have cars
24 lined up to 82nd. All that from the automobiles,
25 carbon monoxide, you have to breath all that. I

1 lived there since '42. We have to breath that
2 kind of junk.

3 MR. WOLSFELD: Let me respond to that.
4 First off, the signalized intersection at Killebrew
5 and Cedar will be eliminated and trucks that are
6 hauling gravel from wherever to wherever will now
7 go through that area without having to stop at the
8 intersection because the roadway will be depressed
9 about 20 feet. There will be no starting point.
10 There is no firm construction schedule for Cedar
11 Avenue, mainly because there is no financial plan
12 that's agreed upon by the state and the city in
13 terms of the funding for the roadway improvement.
14 Meetings have been held with the Minnesota Depart-
15 ment of Transportation. I think this is viewed
16 as the number one priority of transportation improve-
17 ment required to service the airport southdistrict
18 and in terms of implementation schedule, I think
19 we would hope that within approximately 2 years,
20 we can start construction and hopefully by the fall
21 of 1989, that improvement could be in place.

22 MR. CORBETT: This part here, where you make
23 the turn, the way I understood it, they were going
24 to get that house back in here. The way we under-
25 stood it, they were going to take our houses and

1 make a ramp in here. That's the way it was
2 explained to us.

3 MR. WOLSFELD: I think you are referring
4 to the public meeting. There was a public meeting
5 held in which five different alternatives
6 for Cedar Avenue were considered and one of those
7 did have a loop which required the acquisition
8 of residential properties on the west side of
9 Cedar. That was not selected as the preferred
10 alternative so at this point, the preferred
11 alternative does not require any property acquisi-
12 tion on the west side of Cedar.

13 MR. CORBETT: How about all the people that
14 live here? This guy by the Mets Center, you can
15 go through all the expense and you can't do nothing
16 for us over here.

17 MR. WOLSFELD: The primary genesis --

18 MR. CORBETT: You have a little money and
19 we don't have any.

20 MR. WOLSFELD: The Bloomington comprehensive
21 plan which we took some direction from, does not
22 show any direct planned access from Cedar Avenue
23 to the west side of Cedar. I think one of the
24 reasons for that is shown on this graphic which
25 shows the accessibility from the regional roadways

1 system to the various areas in the various sub
2 areas within the airport south district. I think
3 the feeling was if direct land access was provided,
4 via an interchange to the west side of Cedar that
5 that could cause a major change in land use within
6 that entire residential area and that was not some-
7 thing that Bloomington wanted.

8 MR. RULLAND: Does that answer your question?

9 MR. CORBETT: If that don't change, I won't
10 have a wife. She is down to 95 pounds now. Breath-
11 ing that crap all the time. It don't make sense
12 we have to sit and take all that junk.

13 MR. RULLAND: That is something I know you
14 have talked to Lyle Berg, the City of Bloomington
15 Transportation Engineer. I suspect that's where
16 you will have to pursue any concerns you might have.

17 MR. CORBETT: When are they going to quit
18 hauling that sand so they quit going up and down
19 the road?

20 UNIDENTIFIED SPEAKER: Never.

21 MR. RULLAND: We are not familiar enough
22 with what's --

23 MR. CORBETT: If it isn't trucks going by,
24 it's airplanes going overhead. Some day they are
25 going to take our chimneys off. We have it coming

1 both ways. Traffic and up in the air.

2 MR. RULLAND: At this time, I would like --

3 MR. HALVORSON: I agree with him. I have
4 no more to say other than what he has to say.
5 The noise and the fumes are bad.

6 MR. RULLAND: I appreciate your comments.
7 One of the purposes of the doing the impact,
8 environmental impact statement was to identify
9 noise and air problems and to hopefully look to
10 ways which they can be mitigated, the noise
11 quieted and the dust held to a minimum. Whether
12 that's going to all happen in the next week,
13 that's improbable. Over a period of time, hopefully
14 this area does become developed, those considera-
15 tions will be taken into account.

16 MR. CORBETT: If they spend that
17 money on the Met Stadium there, why can't they
18 do something for us?

19 MR. RULLAND: That's something you will
20 have to talk to --

21 MR. HALVORSON: How about devaluation of
22 property?

23 MR. RULLAND: These are all legitimate
24 questions that should be raised with the City of
25 Bloomington in regards to their concerns.

1 MR. LEE: I have been involved in the study.
2 I think you do get some benefits if this road is
3 constructed. The study has identified that the
4 noise level at your houses would be less than
5 today even with the year 2000 traffic.

6 MR. CORBETT: We aren't going to be there
7 that long.

8 MR. LEE: The single thing we can do is
9 to advance this construction is to do this study.
10 Had we not done the study, the road would be 2
11 years further away than it is today. This study
12 is in aid of advancing construction of the road.
13 As I hear you describe your problems, this road
14 is going to marginally improve your situation
15 in terms of noise and it is going to significantly
16 improve your situation in terms of having traffic
17 stop at Killebrew and start up and it won't be in
18 your view when it's doing that. It will be
19 depressed 20 feet. You won't be able to see the
20 traffic.

21 MR. CORBETT: Are they going to dig the road
22 down?

23 MR. LEE: When the road is depressed, the
24 main line will be depressed by 20 feet. A through
25 vehicle, you won't be able to see from your house.

1 MR. CORBETT: How about Killebrew Drive?

2 MR. LEE: Those cars that are coming across
3 into the stadium site will be at the same level as
4 the current frontage road. That will be the same
5 as the current situation you have now. But, at
6 least the through traffic will be depressed down.
7 and won't be visible to you. That's why the
8 noise level is reduced.

9 MR. CORBETT: That won't get you away
10 from the smell of carbon monoxide gas.

11 MR. LEE: You can't smell carbon monoxide
12 gas. Whether it will change any odor you have
13 from deisel engines, I don't know.

14 MR. CORBETT: I wish some of you big shots
15 here in Bloomington come over the sit in our yards
16 and listen to that noise and see the cars and
17 the trucks and suffer with it. We were out there
18 long before the freeway.

19 MR. RULLAND: I would like to move along.
20 There are some other folks here that want to provide
21 comments.

22 MS. UNDERKOFER: The question may not be
23 appropriate at the time. I am wondering who would
24 have the influence or power to use some of the
25 mitigated measures you have mentioned as far as

1 transportation; car pooling; flex time; buses.
2 It's easy to say these mitigated measures, who can
3 implement them; who has that authority?

4 MR. WOLSFELD: Well, the authority -- there
5 is no one single agency in the Metropolitan area
6 that has clear authority to implement each of
7 those possible mitigation measures.

8 One of the measures is to increase the bus
9 transit service to the area. That would be
10 Metropolitan Transit Commission.

11 There is also the discussion of potential
12 extension of transit from the Hiawatha Corridor
13 to the Stadium and that responsibility would
14 rest with the new regional transit board and
15 possibly even the Hennepin County Regional
16 Railroad Authority. The City of Bloomington has
17 some control in terms of the way they implement
18 and allow the development of the project to proceed
19 in terms of requirements they make of the developer
20 in terms of the number of parking spaces provided,
21 the kinds of commitments they have to make and the
22 ride sharing and other aspects, how they manage
23 their project so from that standpoint, the City of
24 Bloomington could have some influence on how those
25 activities are implemented and/or if they are

1 implemented, so really, the responsibility is
2 spread amongst many agencies.

3 If there were air quality violations,
4 you do require indirect source permits for develop-
5 ment of this magnitude. We do not anticipate any
6 violations of state or federal air quality standards
7 so we would not expect the Pollution Control Agency
8 to have influence in terms of mitigation. I summar-
9 ize by saying the Metropolitan Transit Commission,
10 the City of Bloomington and probably the Regional
11 RTB.

12 MR. RULLAND: Does anyone wish to start out
13 by making comments regarding the adequacy of the
14 information contained and not contained in the
15 draft impact statement?

16 MS. MELLOTT:: My name is Elaine Mellott.
17 I live at 9400 Cedar Avenue, Bloomington. My
18 presence here, however, is as Chairwoman of a
19 group called Friends of the Minnesota Valley.
20 I have long had an interest in how the city develops,
21 particularly wildlife and I would like to comment
22 before we start in 1974, as Chairman of the Natural
23 Resources Commission for the City, we hoped that
24 a generic environmental impact statement process
25 would occur so we could get a look at impacts for

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

large areas of the City rather than trying to look at one area or one development at a time, so we are very glad to see this process move ahead.

However, some of our comments are very critical and I would like to proceed at this time and I am sure that this is what the process is all about that it can hear what the concerns of other individuals in the impact preparers are.

Our letter is directed to the EQB in care of Greg Downing.

"Gentlemen: Thank you for the opportunity to review this D.E.I.S.

As we understand it, an Environmental Impact Statement is a guarantee that public policies take explicit account of environmental costs with respect to proposed development and that it should offer solutions to unacceptable environmental costs.

The Airport South District D.E.I.S. is a forecast of great change for East Bloomington. It contains many telling comments which reveal the development biases of the document preparers. We feel the D.E.I.S. does not offer enough substantial solutions to maintain the quality of life expected and experienced

1 by current residents and wildlife; or, for
2 future workers and future residents. It is
3 instead a document of development accommodation.
4 Our general concerns are:

5 No refuge air quality measurements have
6 been taken and no information made available
7 on the impact of air quality changes, other
8 than CO on humans. We also need to know the
9 effects on flora and fauna, many of which
10 are less able to cope with both long and
11 short term changes than humans.

12 Responsibility for district water quality
13 maintenance is not clearly defined except
14 for spills.

15 The D.E.I.S. maintains airport south area
16 development will not impact airport operations.
17 But there are many indications that closeness
18 to the airport will be a principal development
19 market thrust and will encourage air traffic
20 to increase. Test plan aircraft use of the
21 TH77 corridor in conjunction with Airport
22 South District development is already stress-
23 fully, physically and monetarily, impacting
24 area wildlife and residents.

25 The aircraft corridor change, if enacted,

1 will negatively impact the quality of
2 education and recreation experience for which
3 the valley is famous. 675,000 visitors a year
4 (1,850 per day) are expected to use the state
5 trail system. 45,000 high school students
6 are expected to use the bass ponds education
7 facility and another 300-400,000 visitors are
8 expected to visit the planned refuge visitor
9 center and Long Meadow Lake Refuge demonstra-
10 tion sites yearly. The D.E.I.S. does not
11 appear to acknowledge or place a high value
12 on these refuge benefits and activities by
13 providing a quality esthetic and low noise
14 level experience for refuge visitors.

15 We do not feel the D.E.I.S. should be
16 approved as adequate by the EQB without review
17 of: The Bloomington Implementation Plan in
18 response to the Metropolitan Council Guidelines
19 for Land Use Compatibility with Aircraft Noise
20 and approval of the City of Bloomington's plan
21 for implementation of a city shore line zoning
22 ordinance in accordance with the State of
23 Minnesota regulations.

24 The "Friends" feel that inadequate concern
25 is shown for the refuge as a natural and

KIRBY A. KENNEDY & ASSOCIATES

PHONE: (612) 922-1958

411 EDINA EXECUTIVE OFFICE PLAZA
5200 WILLSON ROAD
MINNEAPOLIS, MINNESOTA 55424

HEARING ROOM AVAILABLE
ST. PAUL, MINNESOTA

1 educational resource. Since the refuge
2 comprises more than half of the D.E.I.S. land
3 area, this is a serious and costly oversight.

4 We noted mention of only one impact con-
5 sidered significant by the authors in the
6 entire D.E.I.S. This does not seem realistic
7 in view of what is proposed. We feel the
8 proposed development accommodations should be
9 less intense and more considerate of area
10 wildlife and residents or the D.E.I.S. should
11 not be approved. We want the E.I.S. to work
12 and we want the forecast growth to be managed
13 to maintain a decent quality of life for area
14 residents and workers. We must take care of
15 ourselves and our natural resources. Other
16 specific comments will be forwarded to you
17 before September 5, 1984."

18 I don't think you would want to hear them
19 tonight but we have about, somewhere between 6 and
20 10 pages of specific comments addressed to the
21 document. I guess to some of the individuals in
22 the office, I have long been excited about the many
23 of the things the City of Bloomington Planning staff
24 has done. I think they are far ahead of many plann-
25 ing groups in the entire country. One of the things

1 I was most excited about was the fact that they
2 felt that we can live and work in the same area.
3 I tried that. Based on -- I am doing it now.
4 Based on the premise that it seemed like a good
5 idea, but I really wonder if future residents,
6 in view of the airplane noise, the use we see on
7 494, Cedar Avenue, etc., will encourage people
8 to want to move and use the area. It really sounds
9 kind of overwhelming right now.

10 Also, I would like to say, in addition to my
11 earlier comments on the process, that since we
12 don't understand what happens from this point
13 forward, with respect to specific project E.I.S.
14 statements, we are a little bit afraid of this
15 process because it is so broad in nature and we
16 don't want to lose our rights to be concerned
17 about how the area does develop and what happens
18 to the wildlife refuge.

19 I also request that information on the
20 budget for this specific individual parts of the
21 E.I.S. be made public so we know how much of the
22 budget was spent for transportation planning versus
23 the others and again, we do feel that the City and
24 Metropolitan Council do good work in this area.

25 Thank you very much.

1 MR. RULLAND: There are a couple of comments
2 I would like to make. One. In terms of the budget,
3 making public of the breakdown as to how much is
4 spent for transportation. That is something that
5 you would have to request of the City. They
6 have footed the bill for the preparation of the
7 E.I.S. and whatever their policies area. The EQB
8 has no say over how they spend the money. We are
9 concerned about the information that was developed
10 and how it was presented.

11 As far as what happens next, that's a very
12 legitimate question and I think one we should try
13 and get some understanding.

14 A generic E.I.S. is sort of an unusual animal.
15 This is the first one that's ever been done. In
16 essence, it's a environmental analysis of an area
17 in this case, that covers a number of possibilities
18 of probable or possible development. It is not the
19 final sign off in terms of the environmental impacts
20 that will occur when specific development happens.
21 A generic E.I.S. gives many advantages. I won't
22 run through all of them right now, beyond the
23 principal one of being able to address a series
24 of development rather than taking a look at them
25 each individually. It is going to give the City of

1 Bloomington and other permitting agencies an up-
2 front view of what's going to happen should certain
3 development levels occur. When it comes to a
4 specific proposal for a development, within the
5 district boundaries of Airport South, each one
6 of those is subject to further environmental
7 review pursuant to the individual, the environmental
8 review rules of the Environmental Quality Board.
9 That doesn't mean each and every one of those
10 developments that occur will have either an EAW,
11 environmental assessment worksheet, or an environ-
12 mental impact statement prepared. There is the
13 possibility, unless they are specifically exempted
14 from our rules, of such review happening.

15 In other words, if somebody comes in and wants
16 to put in a major shopping center on the Metropolitan
17 Stadium site, and that shopping center is covered
18 by our rules, then the environmental assessment
19 worksheet or impact statement must be prepared.

20 Does that respond to what happens next?

21 UNIDENTIFIED SPEAKER: It helps.

22 MR. RULLAND: By the completion of this
23 generic E.I.S., does not mean further environmental
24 review will not occur on site.

25 MR. LEE: The distribution of the cost of this

1 study have been public since the time the City
2 Council decided that undertaking 2 years ago and
3 when they reviewed the budget, I believe the
4 distribution was roughly 60% for the transportation
5 portion of the study; 30% for the environmental
6 Impact Statement, and 10% to the indirect
7 source permit. That's the way the budget for the
8 study was laid out from the time it was considered
9 and approved by the City Council.

10 MR. RULLAND: Thank you.

11 MR. BOSANKO: I would like to follow up on that
12 question. Having been part of the Friends of
13 Valley group here in analyzing the E.I.S., the
14 question comes to me is whether or not we, at this
15 point, are satisfied. Let's say we have a final
16 E.I.S. What I need to know is who polices the
17 document; who enforces it; who takes the recommenda-
18 tions and make sure the developers carry them out?
19 I don't know. Maybe it's in there and I missed it.
20 Is this the EQB that does it? Who says, okay,
21 we are mitigating this. We have these recommenda-
22 tions now; 5, 10 years from now, again, who is going
23 to make sure that's going to be done? We have a
24 nice set of principals and a nice set of recommenda-
25 tions. See what I am getting at? Maybe there are

1 things here that say you have to do this. You have
2 to put in a sound wall or whatever.

3 MR. RULLAND: That's a very good question
4 as to now that you have done the work, spent all
5 the money, what happens next?

6 The answer to me is, as well as the philosophy
7 of the environmental review program, the purpose
8 of the environmental review of preparing these
9 documents is to identify for the public and for the
10 decision makers what the anticipated impacts of
11 their decisions are going to be. I am talking about
12 the decision makers; I am talking primarily about
13 government agencies that have to make the zoning
14 changes; issue the variances; grant the permits;
15 do the financing; review proposals from other people.
16 Those are decision makers. The purpose of doing
17 this document and subsequent documents is to lay
18 out for everybody to see what's going to happen
19 should development proceed as proposed. In terms
20 of policing, if you want to use that type of
21 phraseology, it's up to the City of Bloomington
22 in this case; it's up to individual citizens who
23 become aware of what's happening; aware of what's
24 contained in the document; it's up to different
25 state agencies and regional agencies who have to

1 issue permits or give other approval of different
2 developments that occur. There is no police
3 mechanism that the EQB has. It has been suggested
4 over time. We never got the funding to put a
5 staff person in the community. Implementation
6 of the rules of the process rests, in this case,
7 primarily with the City of Bloomington. There are
8 people that play a role. The Friends of Minnesota
9 Valley. A whole slew of state and regional agencies.
10 It is primarily the city. Does that answer your
11 question?

12 MR. BOSANKO: That's helping.

13 MR. RULLAND: Any other comments on the informa-
14 tion contained or not contained in the draft impact
15 statement?

16 UNIDENTIFIED SPEAKER: I have a personal comment
17 to make. I don't live in the study area, but I live
18 nearby and what happens in the study area has an
19 impact on me. For example, this morning as a
20 result of the test airport pattern, 26 commercial
21 jets came over my house at an elevation lower
22 than 1,000 feet. That has an impact on me, a
23 very significant one. It concerns me to see the
24 reaction between the professional people here and the
25 people who live in the area and who are impacted

1 by it. That's really what it's all about. I would
2 really like to see a little more concern and
3 reaction to issues such as these gentlemen bring.
4 It's interesting to me that people in the peripheral
5 area who are here to see what the meeting is all
6 about.

7 MR. RULLAND: Thank you. Any other comments
8 regarding the information contained in the draft
9 E.I.S.? Any other questions regarding to the process?
10 What happens next? What we are trying to do?
11 What the City is trying to do?

12 I would like to note for the record there are
13 no further comments or questions. I would like
14 to reiterate what Greg Downing said earlier that
15 written comments will be accepted through September
16 5. All comments should be directed toward the
17 adequacy of the information contained or not con-
18 tained in the E.I.S. and they should be sent to
19 Greg Downing, The Environmental Quality Board,
20 100 Capital Square Building, 550 Cedar Street,
21 St. Paul, Minnesota 55101. Greg will see that
22 comments are distributed to the City of Bloomington
23 and other people on the project management team.

24 Anything else from anybody on anything?

25 MS. UNDERKOFER: Who will be receiving comments

1 City of Bloomington? Those of us who make comments,
2 will we get a copy of all the comments received?
3 How do we find out what other people are thinking?

4 MR. RULLAND: What I am asking for is that
5 all comments be submitted and funneled through Greg.
6 The City of Bloomington is responsible for the
7 preparation of the final E.I.S. The final E.I.S.
8 is a composite of the draft document plus comments
9 made on that draft document plus responses to those
10 comments. That's why Greg will pass on any comments
11 received from the City of Bloomington. It's easier
12 if we have to identify one person.

13 As far as your seeing or obtaining comments
14 that come in during this open period, where
15 written comments will be accepted, that's up to you.
16 If you want to see what comes in, you should contact
17 Greg. You can call the Environmental Quality Board.
18 His direct line is 296-8253. Greg and whoever
19 calls can make arrangements for getting other
20 responses. Anything that comes in to us is public
21 document.

22 Anything further?

23 Thank you very much.
24
25

1 STATE OF MINNESOTA)
2 : SS.
3 COUNTY OF HENNEPIN)

4 Be it known that I recorded the hearing In the
5 Matter of South Airport Public Meeting, Draft Generic Environ-
6 mental Impact Statement at the Bloomington City Hall, Bloomington,
7 Minnesota, on August 21, 1984.

8 That the proceedings were recorded in Stenotypy by
9 myself and transcribed into typewriting under my direction, and
10 that the hearing is a true record of the proceedings to the best
11 of my ability.

12 That I am not related to any of the parties hereto
13 nor interested in the outcome of the action.

14 WITNESS MY HAND AND SEAL this 27th day of August,
15 1984.

16
17 Mary Reichling
18
19
20
21
22
23
24
25

KIRBY A. KENNEDY & ASSOCIATES
PHONE: (612) 922-1955

411 EDINA EXECUTIVE OFFICE PLAZA
5200 WILLSON ROAD
MINNEAPOLIS, MINNESOTA 55424

HEARING ROOM AVAILABLE
ST. PAUL, MINNESOTA