

# REPORT / RECOMMENDATION



**To:** MAYOR AND COUNCIL

**Agenda Item #:** VII.B.

**From:** Cary Teague, Community Development Director

**Action**

**Discussion**

**Information**

**Date:** September 3, 2013

**Subject:** Resolution 2013-70 Adopting the Final AUAR, Alternative Urban Areawide Review – Update for Pentagon Park

**Action Requested:**

Adopt the attached resolution 2013-70.

**Information/Background:**

Attached is the Final AUAR Update, including comments made by three agencies, Met Council, MnDot, and Hennepin County. Responses to those comments have been sent to the agencies, and are also included in the Final AUAR Update.

No agency objected to the AUAR Update, so the City can adopt the Update. Hennepin County believed that the AUAR was incomplete, which is not an objection. The County was looking for specific detail that is typically found in a specific development proposal; which is not the purpose of an AUAR. That kind of detail and analysis would follow as part of a specific development proposal.



**RESOLUTION NO. 2013-70**  
**ADOPTING THE FINAL ALTERNATIVE URBAN AREAWIDE**  
**REVIEW (AUAR) UPDATE FOR THE GATEWAY STUDY AREA**

BE IT RESOLVED by the City Council of the City of Edina, Minnesota, as follows:

Section 1. BACKGROUND & FINDINGS.

- 1.01 A AUAR Update has been completed for the project pursuant to Minnesota Rules 4410 and identifies and assesses the environmental impacts and mitigation measures associated with the Gateway Study Area.
- 1.02 The Gateway Study Area is located on approximately 135 acres generally between TH100, the Fred Richards Golf Course, France Avenue and Edina's border with Bloomington within the City of Edina in Hennepin County as shown in the AUAR.
- 1.03 The AUAR was updated pursuant to Minnesota Rules 4410.3610.
- 1.04 The AUAR Update was distributed for the required 10-day comment period.
- 1.05 Comments received on the AUAR Update have generated information adequate to determine mitigation measures associated with the potential redevelopment in this area.
- 1.06 No agency objections were filed for the AUAR Update.
- 1.07 The comments received and responses developed are included in the public record for the AUAR.
- 1.08 Redevelopment in the Gateway Study Area is expected to comply with all Edina and review agency standards as well as the mitigation measures outlined in the AUAR Update.

Section 2. APPROVAL.

NOW THEREFORE, it is hereby resolved by the City Council of the City of Edina the following:

The City of Edina adopts the Final Gateway Study Area Alternative Urban Areawide Review Update dated September 3, 2013.

**CITY OF EDINA**

Adopted this \_\_\_ day of \_\_\_\_\_, 2013.

ATTEST: \_\_\_\_\_  
Debra A. Mangan, City Clerk

\_\_\_\_\_  
James B. Hovland, Mayor

STATE OF MINNESOTA            )  
COUNTY OF HENNEPIN        )SS  
CITY OF EDINA                    )

CERTIFICATE OF CITY CLERK

I, the undersigned duly appointed and acting City Clerk for the City of Edina do hereby certify that the attached and foregoing Resolution was duly adopted by the Edina City Council at its Regular Meeting of \_\_\_\_\_, 2013, and as recorded in the Minutes of said Regular Meeting.

WITNESS my hand and seal of said City this \_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
City Clerk



City of Edina  
4801 West 50th Street • Edina, MN 55424  
(952) 826-0460

Original AUAR: September 2007

Update 1: September 2013

# FINAL ALTERNATIVE URBAN AREAWIDE Review UPDATE

Gateway Study Area - Update

City of Edina, Minnesota

WSB Project No. 1686-37



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**FINAL ALTERNATIVE URBAN AREAWIDE REVIEW UPDATE**

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**GATEWAY STUDY AREA – UPDATE (Final)**

**FOR THE  
CITY OF EDINA, MINNESOTA**

**Original AUAR: September 2007  
Update 1: September 3, 2013**

**Prepared By:**

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# TABLE OF CONTENTS

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## TITLE SHEET

## TABLE OF CONTENTS

I.	Introduction and Purpose .....	1
II.	Approved Development/Current Conditions.....	2
III.	Areas Remaining to be Developed.....	2
IV.	Update to the Environmental Review .....	2
V.	Mitigation Summary and Update.....	7
VI.	AUAR Update Review.....	14

## List of Figures

Figure 1	Location Map
Figure 2	USGS Location Map
Figure 3	Aerial Photo
Figure 4-1	Scenario 1
Figure 4-2	Scenario 2
Figure 4-3	Scenario 3
Figure 4-4	Scenario 4
Figure 5	Adjacent Developments

## Appendix A – Figures

## Appendix B – Agency Correspondence

**I. Introduction and Purpose**

The Gateway Study Area (Study Area) is approximately 135 acres. The Study Area is bounded by Minnesota Trunk Highway 100 (TH 100) on the west; France Avenue on the east; 76<sup>th</sup> Street West and Fred Richards Golf Course on the north; and Edina’s border with Bloomington on the south. The area is shown on **Figures 1, 2, and 3**. The Study Area currently contains a mixture of light industrial/warehouse, commercial, office and residential uses. There is a total of 1,904,000 gross square feet (gsf) of these uses in the existing conditions.

The City of Edina adopted the Final AUAR on November 5, 2007. Pursuant to Minnesota Rules 4410.3610 Subp. 7, for the AUAR to remain valid as the environmental review document for the area, the document needs to be updated every five years until all development in the study area has received final approval. Since redevelopment has not occurred in the study area and the AUAR expired in November 2012, the purpose of this document is to update the AUAR pursuant to Minnesota Rules.

The 2007 AUAR included an analysis of the following development scenarios (**Figure 4-1 to 4-4**):

- Scenario 1 – Comprehensive Plan
- Scenario 2 – Master Plan Scenario
- Scenario 3 – Maximum Commercial Build Scenario
- Scenario 4 – Maximum Residential Scenario

**Table 1: Summary of Redevelopment Scenarios**

	<i>Existing Conditions</i>	<i>Scenario 1: Comprehensive Plan</i>	<i>Scenario 2: Master Plan</i>	<i>Scenario 3: Maximum Commercial</i>	<i>Scenario 4: Maximum Residential</i>
Office	1,873,000	1,546,000	1,862,000	3,261,000	1,094,000
Commercial / Retail/Hotel		15,000	174,000	15,000	15,000
Office & Light Industrial Mix		1,296,000	1,296,000	1,296,000	1,296,000
Residential	31,000	31,000	914,000	31,000	1,581,000
<b>TOTAL:</b>	<b>1,904,000</b>	<b>2,888,000</b>	<b>4,246,000</b>	<b>4,603,000</b>	<b>3,986,000</b>

In 2008, the City updated their Comprehensive Plan. However, Scenario 1 is still consistent with the Comprehensive Plan.

This AUAR Update serves as an update of the 2007 AUAR, and includes a review of the areas that have and have not developed, an update to the environmental analysis as needed, and a review of the mitigation measures. The original 2007 AUAR is available

for review on the City's web-site at  
<http://edinamn.gov/index.php?section=community-development-planning>.

## II. **Approved Development/Current Conditions**

No redevelopment has occurred within the study area. **Figure 3** shows the aerial photo for the site. In 2008, the City updated their Comprehensive Plan. However, Scenario 1 is still consistent with the Comprehensive Plan.

## III. **Areas Remaining to be Developed**

No redevelopment has occurred within the study area. The initial potential redevelopment that triggered the initial AUAR in 2007 did not come to fruition. Recently, there has been renewed interest in redevelopment of the area. The redevelopment plans are within or below the densities analyzed in the AUAR.

**Timeline:** The 2007 AUAR anticipated redevelopment of the Pentagon Towers and Pentagon Quad areas (approximately 39 acres) to begin in 2008 and be completed within 5-7 years. The remaining 96 acres did not have a specific timeline for redevelopment. This redevelopment has not occurred. The current estimate for redevelopment timeline for the area is 5-10 years.

## IV. **Update to the Environmental Review**

**Wildlife:** The DNR Natural Heritage Database was reviewed to provide an update for any threatened and endangered species. This review and DNR correspondence is included in **Appendix B**. There are no new incidents of rare or endangered species within the study area.

**Contamination and Past Land Use:** Public MPCA database information was reviewed to update this section of the AUAR to identify verified or potential hazardous substances and petroleum release sites associated with the project area or surrounding area. The following databases were reviewed as part of this investigation:

- MPCA "What's in My Neighborhood?" website search
- MPCA Storage Tank Leak site website search

Twenty-nine database listings were identified for the project area. Some of the identified sites were listed on more than one database and the majority of the listings were for small quantity hazardous waste generator (15) and tank sites (7). Inclusions on these databases do not directly indicate an environmental hazard and no spills or mishandling of hazardous waste was identified during the review. However, the following database listings for the project area were determined to directly indicate historic or current environmental contamination:

#### Leaking Underground Storage Tank (LUST) Sites

- MPCA Leak #4105 – Pentagon Office Park located at 4930 West 77<sup>th</sup> Street, Edina, MN 55435. This site has been issued site closure by the MPCA. Site closure indicates that the contamination, if present, has been investigated and determined to not pose a threat to human health or the environment. Note: site closure does not indicate that the site is free of contamination.
- MPCA Leak #627 - Pentagon Office Park located at West 77<sup>th</sup> Street, Edina, MN 55435. This site has been issued site closure by the MPCA.
- MPCA Leak # 617 – Roberts Automatic Products located at 4451 West 76<sup>th</sup> Street, Edina, MN 55435. This site has been issued site closure by the MPCA.

#### Voluntary Investigation and Cleanup (VIC) Sites

- MPCA VIC #28660 – Hillcrest Development located at 4530, 4540, 4550, 4570, 4600, 4640, and 4660 West 77<sup>th</sup> Street, Edina, MN 55435.
- MPCA VIC #29410 – Hillcrest Development located at 4510, 4815, and 4901 West 77<sup>th</sup> Street and 7600 Parklawn Avenue, Edina, MN 55435.
- MPCA VIC #2890 – Parklawn located at 7625 Parklawn Avenue, Edina, MN, 55435.
- MPCA VIC #13540 – National Rental Car located at 7700 France Avenue, Edina, MN 55435.

#### Petroleum Brownfields Sites

- MPCA PB #4182 – Hillcrest Development located at 4530, 4540, 4550, 4570, 4600, 4640, and 4660 West 77<sup>th</sup> Street, Edina, MN 55435 (also a VIC site).
- MPCA PB #4239 – Hillcrest Development located at 4510, 4815, and 4901 West 77<sup>th</sup> Street and 7600 Parklawn Avenue, Edina, MN 55435 (also a VIC site).

**Wastewater System:** The AUAR analyzed the wastewater system in the area, including the Metropolitan Council's interceptor, BN-499. Since the 2007 AUAR, a wastewater project was completed in the area. As a result of the AUAR and potential re-development anticipated within the study area, the City of Bloomington, in conjunction with Met Council, upgraded Lift Station 10 (MCES L-55) to a near-term capacity of 1.8 million gallons per day (mgd). Project improvements also involved constructing a new 16-inch forcemain to replace the existing 12-inch forcemain in West 84<sup>th</sup> Street in Bloomington providing a long-term capacity in the forcemain of 4.8 mgd. Inter-community flows from Edina have been redirected to the new forcemain, essentially bypassing the gravity portions of MCES Interceptor BN-499 to provide additional capacity for re-development in Bloomington.

**Water Supply System:** No changes to the water supply system have occurred in the area.

**Storm Water Management:** The Nine Mile Creek Watershed District adopted updated rules in 2008. Based on these rules, if a redevelopment project disturbs more than 50 percent of the existing impervious surface on the parcel (or increases the imperviousness of the entire parcel by more than 50 percent), retention of one inch of runoff from all the impervious surface will need to be provided. Also, peak flow runoff rates cannot exceed the existing conditions for the 2-year, 10-year, and 100-year storm events and the runoff from a 2.5-inch storm event from the parcel will need to be treated to remove at least 60% of the phosphorus and 90% of the total suspended solids.

Additionally, Edina Lake, which is north of the project area, was added to the impaired waters list in 2008. Edina Lake is impaired for nutrients/eutrophication. No TMDL study has been completed to date.

**Transportation:** The AUAR completed in 2007 analyzed the impacts of the four development scenarios for the years 2014 and 2030. The analysis for both years assumed a 1% per year growth in general background traffic, the approved development in the Cities of Bloomington and Edina (see Cumulative Impacts) and the proposed Gateway Development traffic. Updated traffic counts were conducted the week of April 1, 2013 at selected intersection and roadway segments on 77<sup>th</sup> Avenue. The updated traffic counts were then compared to those assumed in the 2007 AUAR to determine if the analysis and recommended mitigation measures were still valid.

The peak hour traffic counts ranged from 5% to 15% less than those counted for the base year in the AUAR in 2007. In addition, the 2013 counts were 65% to 75% less than the 2014 Scenario 1 condition, which had the smallest associated trip generation.

The Average Daily Traffic (ADT) counts used as a baseline in the AUAR were from the 2005 MnDOT State Aid counts. In 2009 these counts were updated and in general, these counts were at or slightly lower than those in 2005. The 2013 ADT counts compared to the 2009 ADT counts showed a slight increase (10%) on the section of 77<sup>th</sup> Street from TH 100 to Parklawn Avenue.

Based on the facts that 1) no Gateway Development has occurred in the area, and 2) the majority of the additional development has been in Bloomington and Edina and their traffic generation included in the new 2013 traffic counts, and 3) the area traffic levels have not changed significantly from those assumed in the AUAR for the baseline conditions (see Cumulative Impacts), it can be concluded that the future year analysis and recommended mitigation is still valid.

**Cumulative Impacts:** The Study Area and its surroundings are within a first-ring suburb of Minneapolis that is generally fully developed. Cumulative impacts will generally be driven by either individual parcel redevelopment or area-wide redevelopment. To analyze cumulative impacts for the Study Area, the information

from the 2007 AUAR was updated to reflect known or approved redevelopment projects within or near the TH 100 and I-494 area. **Table 2** summarizes the known redevelopment plans and updates the 2007 AUAR in the area and **Figure 5** shows the location of projects that are currently under construction or are planned for the future.

**Table 2. Summary of Adjacent Redevelopment Proposals**

<i>City</i>	<i>Development</i>	<i>Summary of Impacts</i>
<b>Bloomington</b>	<i>Duke-Weeks Realty Limited Partnership (Norman Pointe)</i>	Phase 1 and 2 completed Phase 3 to add an additional 312,000 sq. ft. of office in the future
	<i>Walser Real Estate II, LLC (Walser Toyota)</i>	50,000 sq. ft. car dealership project completed.
		Addition of 112,000 ft <sup>2</sup> of medical office space completed
	<i>Ryan Companies US, Inc. (Marketpoint)</i>	Phase 1 and 2 completed. Phase 3 to add an additional 250,000 sq. ft. of office in the future.
	<i>Hilton Hotel</i>	256 room hotel and adjoining restaurant completed
	<i>Normandale Investments, LLC</i>	122 space parking ramp to meet demand for existing offices completed
	<i>United Properties</i>	285,000 square foot office building at 8200 Norman Center Drive completed
	<i>Covington Apartments</i>	250 Apartment units – Approved, under construction.
	<i>8100 Office Tower</i>	255,000 ft <sup>2</sup> of office - Future
	<i>Hotel</i>	100 Rooms – Future
	<i>Luxembourg Apartments</i>	282 Apartment units - Approved, under construction
	<i>OATI Office/Data Center</i>	100,000 ft <sup>2</sup> of office - Future
	<i>Venture Bank Office</i>	37,000 ft <sup>2</sup> of office – Completed 2009
<i>Hotel</i>	257 Rooms - Future	

	<i>Norman Pointe III Office Tower</i>	312,000 ft <sup>2</sup> Office - Future
	<i>Marketpoint III Office Tower</i>	250,000 ft <sup>2</sup> Office - Future
	<i>6500 France Avenue</i>	209 Unit Senior Housing / Skilled Care - In review process
<b>Edina</b>	<i>Cypress Properties</i>	Redevelopment of 40,000 ft <sup>2</sup> of a movie theater to 86,000 ft <sup>2</sup> of retail development. (Completed)
	<i>Target</i>	Approved increase of retail space from 154,000 ft <sup>2</sup> to 196,500 ft <sup>2</sup> by 2008. (Completed)
	<i>Westin</i>	Approved construction of an 18 story building with 79 condominiums, a 225 room hotel, and 7,000 ft <sup>2</sup> restaurant (Completed)
	<i>York Place Development</i>	Approved construction of 18,000 ft <sup>2</sup> of retail space and 114 apartments. Replaces 52,750 ft <sup>2</sup> of office space. (Development Completed as CVS)
	<i>TE Miller Development (7380 France Office)</i>	Net increase of 2,000 gsf of office space (Completed)
	<i>6996 France Avenue</i>	3,000 ft <sup>2</sup> Retail and 5,000 ft <sup>2</sup> Office - Completed
	<i>Centennial Lakes Coffee Shop</i>	2,000 ft <sup>2</sup> Coffee Shop - Approved under construction
	<i>Fairview Southdale Expansion</i>	30,000 ft <sup>2</sup> Emergency Room expansion - Approved 2013
	<i>Southdale Residential</i>	232 Units - Approved under construction
	<i>Whole Foods</i>	32,000 ft <sup>2</sup> Whole Food Grocery store - Completed
	<i>YMCA</i>	21,000 ft <sup>2</sup> Expansion - Completed
	<i>Southdale Medical Building</i>	Addition of 22,870 ft <sup>2</sup> to existing building - Completed
	<i>Ebenezer Society Assisted Living</i>	Addition of 76 units - Completed
	<i>Crosstown Medical Building</i>	Replacement of 26,000 ft <sup>2</sup> building with new 75,017 ft <sup>2</sup> medical office - Completed
	<i>Hellmuth &amp; Johnson Law Firm</i>	35,000 ft <sup>2</sup> office building - Completed
	<i>Primrose School of Edina</i>	12,000 ft <sup>2</sup> child care and early childhood education building - Completed
<i>Lund Food Holdings</i>	47,119 ft <sup>2</sup> grocery store, 234 units apartment buildings, 21,873 ft <sup>2</sup> retail - Approved	

**V. Mitigation Summary and Update**

Many of the mitigation measures outlined in the 2007 AUAR still remain valid. The updated mitigation measures are outlined below and either remain in effect from the 2007 AUAR or have been updated based on new analysis as noted.

**A. Land Use Compatibility and Permitting**

- A1. The proposed change in land use of Scenarios 2, 3, and 4 at the Pentagon Towers and Pentagon Quads site will require a Comprehensive Plan Amendment.
- A2. Any redevelopment will be required to meet Edina zoning requirements.
- A3. Any project proposers will be required to obtain any necessary approvals and permits.
- A4. If components of a proposed project exceed Edina City Code requirements, variances from the City's requirement will need to be applied for by the developer. The City will review these variance requests and make a determination as to the approval or denial of the project as part of the review process. A project proposer could also seek to amend the City Code. This request would also be reviewed by the City.

**B. Geologic Hazards, Erosion Control, and Hazardous Material**

- B1. Prior to demolition an asbestos survey shall be completed by a project proposer. At the time of demolition, any necessary asbestos abatement will need to be completed by the project proposer in compliance with MPCA requirements.
- B2. The management, containment, and cleanup of any spills that may occur within the Study Area during construction will be addressed by the permit holders of the MPCA NPDES/SDS Storm Water Construction Permit and its accompanying Storm Water Pollution Prevention Plan preparation.
- B3. If a neighborhood convenience store and gas station is proposed, the project proposer will be required to adhere to State regulations for containment of underground petroleum tanks and an annual license would be needed.
- B4. The Storm Water Pollution Prevention Plan (SWPPP), including temporary and permanent seeding and staging plans, will be required to be submitted by each project proposer and reviewed by Edina.
- B5. The project proposer will need to develop an erosion control plan and submit this plan to the Nine Mile Creek Watershed District for review and approval.

- B6. During construction, the project proposer and their contractor will implement Best Management Practices as needed to prevent erosion and sedimentation of downstream water resources.
- B7. Edina will develop a SWPPP and obtain an NPDES permit for the construction of any public infrastructure improvements (sanitary sewer, storm sewer, water main) that disturb one acre of land or more.
- B8. Edina will conduct erosion control inspections during construction.
- B9. Project proposers will make environmental hazard investigation documents, such as Phase I Environmental Assessments, available to Edina.
- B10. Project proposers will be required to remediate any contaminated soils encountered in conformance with MPCA regulations.
- B11. Project proposers will be required to remove and properly dispose of trash and debris located within a project site, including all demolition materials that may include asbestos.
- B12. Municipal waste hauler companies will make residential and commercial recycling programs available to the Study Area. General municipal waste will be removed by these waste hauler companies.
- B13. The NPDES Construction Site permit requires a site specific SWPPP to be completed for the construction by the project proposer. This SWPPP is required to include pollution prevention management measures for solid waste and hazardous material spills that occur during construction.
- B14. Mitigation includes conformance with the Edina spill response plan. Spills will be reported to the fire chief and/or applicable City Staff. The fire chief and/or applicable City Staff will in turn notify any other appropriate officials depending on the nature of the spill.
- B15. Project proposers will be required to develop a temporary dewatering plan for construction activities, review this plan with Edina and Nine Mile Creek Watershed District for approval, and conform to the dewatering requirements of the Department of Natural Resources (DNR) and NPDES Construction permit.
- B16. If a redevelopment project involves permanent dewatering for underground facilities, a detailed dewatering plan is required to be developed by the project proposer. This plan would include anticipated dewatering amounts, direction of discharge, analysis of impact on adjacent ponds and downstream receiving waters, and impact on the organic material within the Study Area for the

potential for subsidence. The plan will need to be submitted to Edina, Nine Mile Creek Watershed District, and DNR for review and/or approval.

**C. Fish, Wildlife, Wetlands, and Ecologically Sensitive Resources**

- C1. Buildings to be removed as part of redevelopment will be field checked by the project proposer to determine if there are nesting Peregrine Falcons on the structure. If falcons are noted nesting on the structure, the site cannot be disturbed until the juvenile birds have fledged and left the nest.
- C2. The project proposer will be required to delineate wetlands within their project boundaries, if any, and review these delineations with the Nine Mile Creek Watershed District and Edina to determine jurisdictional status. The Nine Mile Creek Watershed District is the Local Government Unit for the Wetland Conservation Act and will review and verify any wetland delineations.
- C3. If wetland impact is proposed, the project proposer will be required to minimize impact to the maximum extent possible and mitigate for any unavoidable impacts in conformance with the Wetland Conservation Act.

**D. Municipal Water Use and Service**

- D1. Edina will work with Bloomington to determine the needs for water system capacity improvements, water main upgrades, and future service to the Gateway Study Area.
- D2. In conjunction with their Comprehensive Plan update, Edina will complete an update to the 2002 Water Distribution System Analysis for the entire city to determine what current and future water system improvements may be necessary to continue to serve the City's water needs and maintain a water system firm capacity above the maximum daily water use within the City.
- D3. As redevelopment occurs, Edina will complete an analysis of the water mains within the Study Area to determine if performing water main replacement is necessary and if it should occur in conjunction with other potential infrastructure improvements, such as sanitary sewer, storm sewer, and transportation improvements.
- D4. Any abandoned wells found within the Study Area will be sealed in accordance with Minnesota Department of Health guidelines. This will be the responsibility of the project proposer.
- D5. In accordance with Edina's Wellhead Protection Plan, continued protection of the existing Drinking Water Supply Management Areas located within the Study Area will be required for redevelopment projects.

**Update:** Additionally, potential for well interference, impact of groundwater pumping on surface waters, and vulnerability to contamination will need to be reviewed if additional water appropriations are needed

- D6. There is potential for areas that redevelop within the Bloomington service area to request to be served by Edina. If this occurs, additional analysis and water main improvements will need to be completed by Edina in coordination with Bloomington.
- D7. Individual redevelopment may require the installation of service pumps to serve multi-story buildings and to provide adequate fire protection. The size and type of pumps will vary based on individual building characteristics, should meet the existing local building and fire protection codes, and will be the responsibility of the developer.

**E. Water Quality and Quantity**

- E1. Redevelopment projects will be required to be designed to meet the policies of the most current Edina Comprehensive Storm Water Management Plan.
- E2. Redevelopment projects will be required to be designed to meet the policies of the most current Nine Mile Creek Watershed District requirements.
- E3. Redevelopment within the Study Area will be required to limit peak runoff rates to at least existing conditions and reduce the runoff volume so as not to negatively impact the existing storm sewer system.
- E4. Redevelopment needs to reduce the amount of impervious surface within the project limits or develop a site specific storm water management plan that shows that the project will not impact downstream pollutant or volume loading.
- E5. If warranted by Edina's Nondegradation Plan, project proposers will need to include storm water management strategies that reduce the total suspended solid loadings, total phosphorous pollutant loadings, and storm water runoff volumes from the Study Area.
- E6. Any redevelopment project that disturbs more than one acre of land is required to develop a SWPPP and obtain an NPDES permit from the MPCA.
- E7. Edina and project proposer(s) will investigate the expansion of the existing ponding areas within the Fred Richards Golf Course to provide additional storage and treatment as outlined in Edina's Water Resource Management Plan.

- E8. The Cities of Edina and Bloomington will petition the Nine Mile Creek Watershed District to expand the South Pond (SP\_1) pond to provide additional storm water treatment for the area.
- E9. As Total Maximum Daily Load (TMDL) studies are completed for Nine Mile Creek, the results of these studies will be reviewed by Edina. Redevelopment in the Study Area will be required to meet any mitigation and pollutant load reductions that may be outlined within the TMDL studies.
- Update:** This mitigation measure also applies to Edina Lake.
- E10. The project proposer will review and determine which Low Impact Development (LID) practices are feasible to be used for each parcel. Edina will review the LID techniques and encourage their use to the greatest extent possible.
- E11. A maintenance plan is required to be reviewed and approved by the Nine Mile Creek Watershed District for privately constructed and maintained storm water management facilities.

#### **F. Wastewater Mitigation Plan**

- F1. Any redevelopment activities that may increase the total sanitary sewer flows within Service Area A beyond threshold limits for peak capacity will require upgraded facilities within the Gateway Study Area (Computer Avenue sanitary sewer) and Bloomington (MCES Bloomington Lift Station No. 10) to accommodate increased flows.

**Update:** Bloomington Lift Station No. 10 is also denoted at MCES Lift Station L-55. In 2011, the pumps in the existing lift station were upgraded to provide a near-term peak capacity of 1.8 million gallons per day (mgd). Future increases in flow for re-development will need to be evaluated as the final lift station site is proposed to be relocated with the proposed future realignment of I-494.

- F2. Edina, Bloomington, and Metropolitan Council Environmental Services will continue discussions and analysis regarding proposed capacity upgrades to Bloomington Lift Station No. 10 and the MCES BN-499 Interceptor along West 84<sup>th</sup> Street in Bloomington.

**Update:** Capacity to L-55 (Bloomington LS 10) was increased to a peak flow of 1.8 MDG as previously discussed. Also in 2011, The MCES BN-499 interceptor was replaced with a 16-inch forcemain from L-55 southerly and westerly along W. 84<sup>th</sup> Street to a gravity sewer approximately 600 feet west of France Avenue. The forcemain was designed to carry peak flows for the proposed redevelopment area.

- F3. Edina will complete its update to their Comprehensive Sanitary Sewer Plan.
- F4. Edina will upgrade Lift Station No. 22.
- F5. In conjunction with redevelopment activities, Edina will determine the condition of the existing sanitary sewer pipe within the Gateway Study Area to determine if repairs or replacement is necessary based on in-place pipe condition and infiltration potential.

**G. Traffic and Transportation**

G1. Scenarios 1 and 4

The following mitigation strategies are needed for Scenario 1 and 4 to accommodate future full development traffic projections:

Intersection: France Avenue / West 76<sup>th</sup> Street  
 Improvement: Extend one southbound thru lane on France Avenue to create a total of four thru lanes

Intersection: France Avenue / West 78<sup>th</sup> Street  
 Improvement: Eastbound dual right turn lanes on West 78<sup>th</sup> Street  
 Southbound lanes approaching the I-494 ramps restriped to provide exclusive lanes to both westbound I-494 and eastbound I-494. The right lane will drop at the westbound I-494 ramp providing an exclusive ramp lane. The second lane will also be an exclusive lane leading to I-494 eastbound, reducing the weaving and stacking of vehicles that occur today. The County has expressed interest in participation.

Intersection: Edina Industrial Boulevard / West 78<sup>th</sup> Street  
 Improvement: Eastbound dual left turn lanes on West 78<sup>th</sup> Street

Intersection: Edina Industrial Boulevard / Metro Boulevard  
 Improvement: Add southbound right turn lane on Metro Boulevard, restriping the existing two southbound lanes to accommodate an exclusive left turn lane, and a thru/left lane, providing dual left turn lanes.  
 Add 300 foot eastbound left turn lane on Edina Industrial Boulevard

Intersection: Northbound TH 100 / West 77<sup>th</sup> Street  
 Improvement: Add 150 foot northbound right turn lane on Frontage Road  
 Westbound dual right turn lanes on West 77<sup>th</sup> Street

G2. Scenario 2  
Scenario 2 will require **all the improvements listed above** in addition to the following:

Intersection: Minnesota Drive / France Avenue  
Improvement: Dual westbound left turn lanes on Minnesota Drive  
Eastbound dual left turn lanes on Minnesota Drive

Intersection: Northbound TH 100 / West 77th Street  
Improvement: Add 150 foot eastbound right turn lane on West 77th Street

Intersection: Computer Avenue / West 77th Street  
Improvement: Northbound dual left turn lanes on Computer Avenue

Intersection: Minnesota Drive / West 77th Street / Johnson Avenue  
Improvement: Southbound dual left turn lanes on West 77th Street

G3. Scenario 3  
Scenario 3 will require **all the above improvements listed under Scenarios 1, 2, and 4** in addition to the following:

Intersection: Minnesota Drive / France Avenue  
Improvement: Eastbound dual right turn lanes on Minnesota Drive

Intersection: France Avenue / West 78th Street  
Improvement: Westbound dual right turn lanes on West 78th Street

Interchange: TH 100 / West 77th Street  
Improvement: Six-lane section from Metro Boulevard to Computer Avenue  
Dual left turn turns at both TH 100 Ramps (Hence an eight-lane bridge)

G4. General  
The mitigation measures discussion above (G1 – G3) are needed to address full build-out of the site and surrounding area. Specific mitigation measures required for proposed development plans will be established through traffic and transportation studies required for each development proposal. These proposals will need to document compliance within the AUAR and mitigation plan.

G5. Transit/Non-Motorized Transportation  
As redevelopment occurs in the Study Area, consideration of site-specific improvements needs to be included as developments are proposed. These

would include upgrading the existing transit facilities, including bus shelters, to become ADA compliant and improving the sidewalk and/or path connections in and around each redevelopment.

#### **H. Odor, Noise, and Dust**

- H1. During construction activities, the project proposer and contractor shall observe all dust control Best Management Practices for fugitive dust.
- H2. Edina will limit construction activities and any other activities that produce noise audible outside the perimeter of a property to between 7:00AM to 9:00PM Monday through Friday and between 8:00AM and 7:00PM on Saturday, Sunday, and holidays.
- H3. Noise mitigation will be necessary if any residential units are constructed near Receptor 2, located in the southwest quadrant of TH 100/West 77<sup>th</sup> Street. Any residential buildings should be constructed using noise abatement methods. Noise abatement requirements to conform to state standards can be found in Minn. Rules 7030.0050, subp. 3.

#### **I. Archaeological, historical, or architectural resources**

- I1. Prior to redevelopment of the Pentagon Towers and Quads sites that would require razing of the existing structures, an evaluation and documentation of the historical and architectural significance of the sites will be needed by the project proposer. This information will need to be submitted to Edina.

#### **J. Cumulative Impacts**

- J1. Edina will work with Bloomington and potentially participate in a regional traffic study that will assist in anticipating future potential redevelopment within the TH 100/I-494 area and plan for infrastructure improvements.

Edina will also coordinate with other entities to address cumulative impacts. These items have been addressed in other areas of the AUAR and include mitigation plan items D1, D6, E8, F1, and F2.

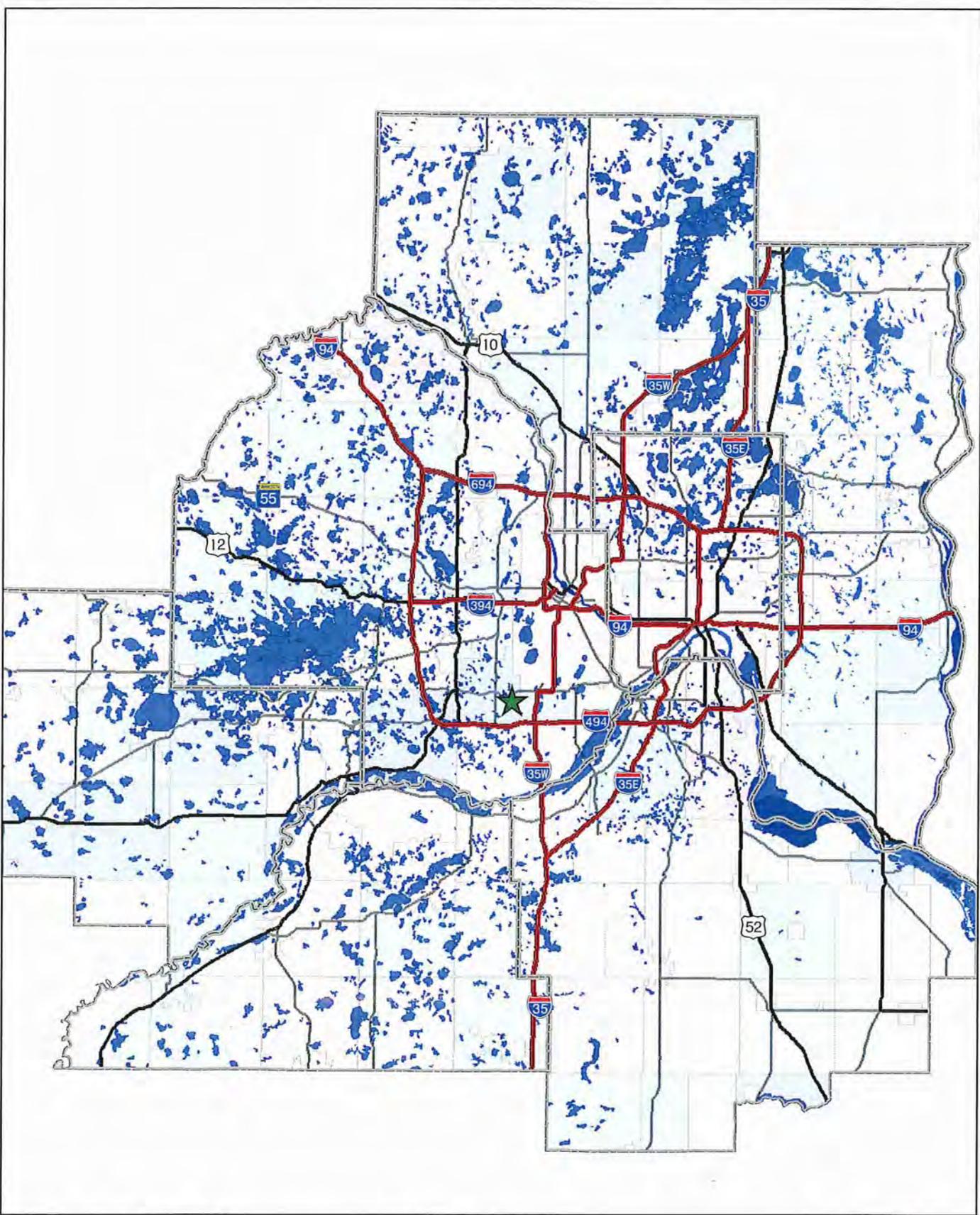
#### **K. Trails**

- K1. **Update:** The City will coordinate with the Three Rivers Park District to facilitate development of the Nine Mile Creek Regional Trail in the study area

#### **VI. AUAR Update Review**

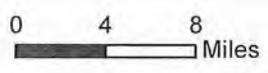
This AUAR Update has been reviewed pursuant to Minnesota Rules 4410.3610 Subp. 7. The Gateway Study Area AUAR will remain valid for an additional five years from the City Council adoption date.

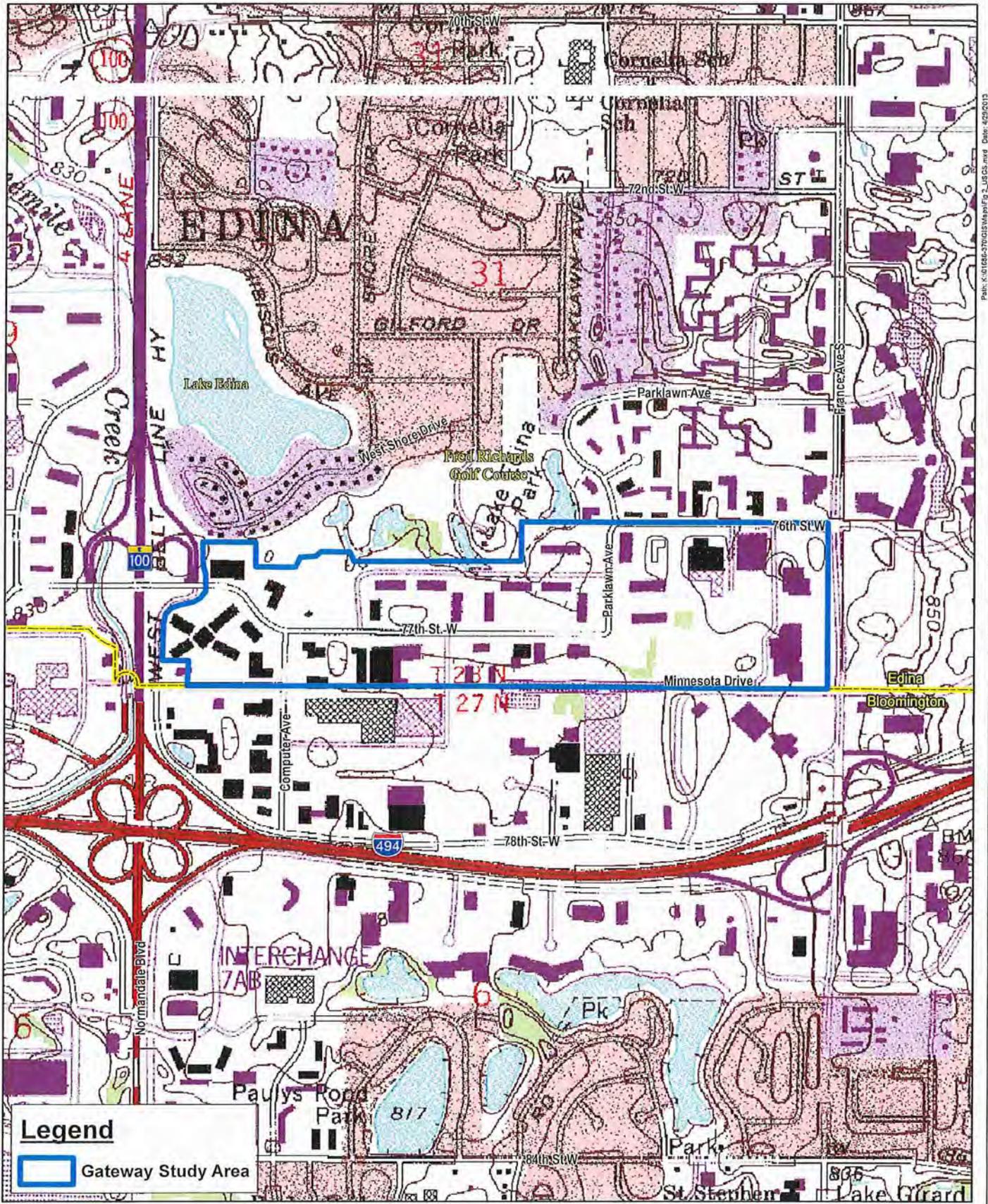
## **Appendix A – Figures**



**Figure 1**  
**Location Map**  
**Gateway AUAR**

**Legend**  
★ Project Location





Path: c:\0166e-370\03\Map\Fig\_2\_UGS.mxd Date: 4/29/2013

**Legend**

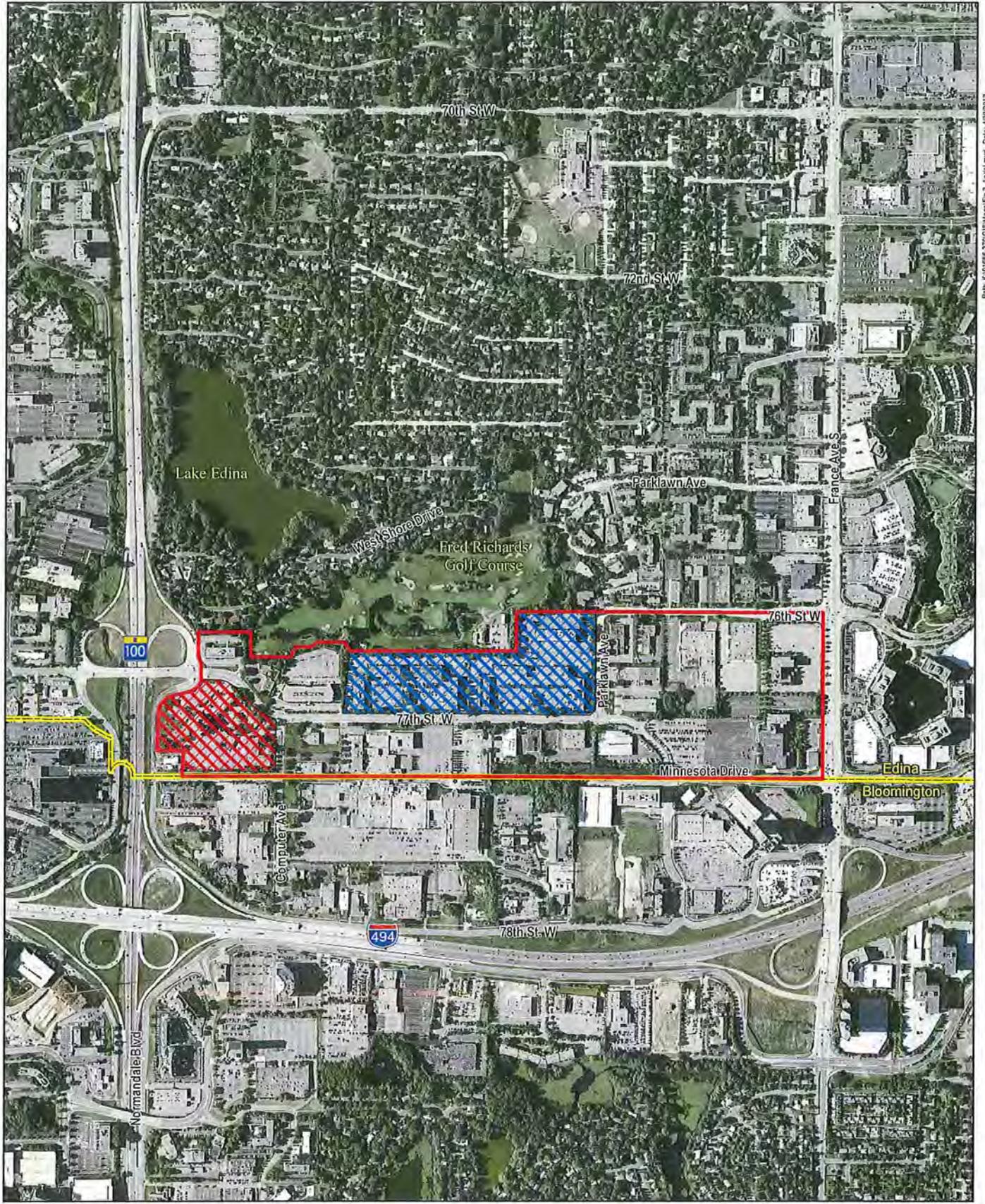
 Gateway Study Area



**Figure 2**  
**USGS Location Map**  
**Gateway AUAR**

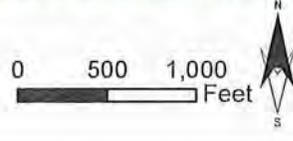
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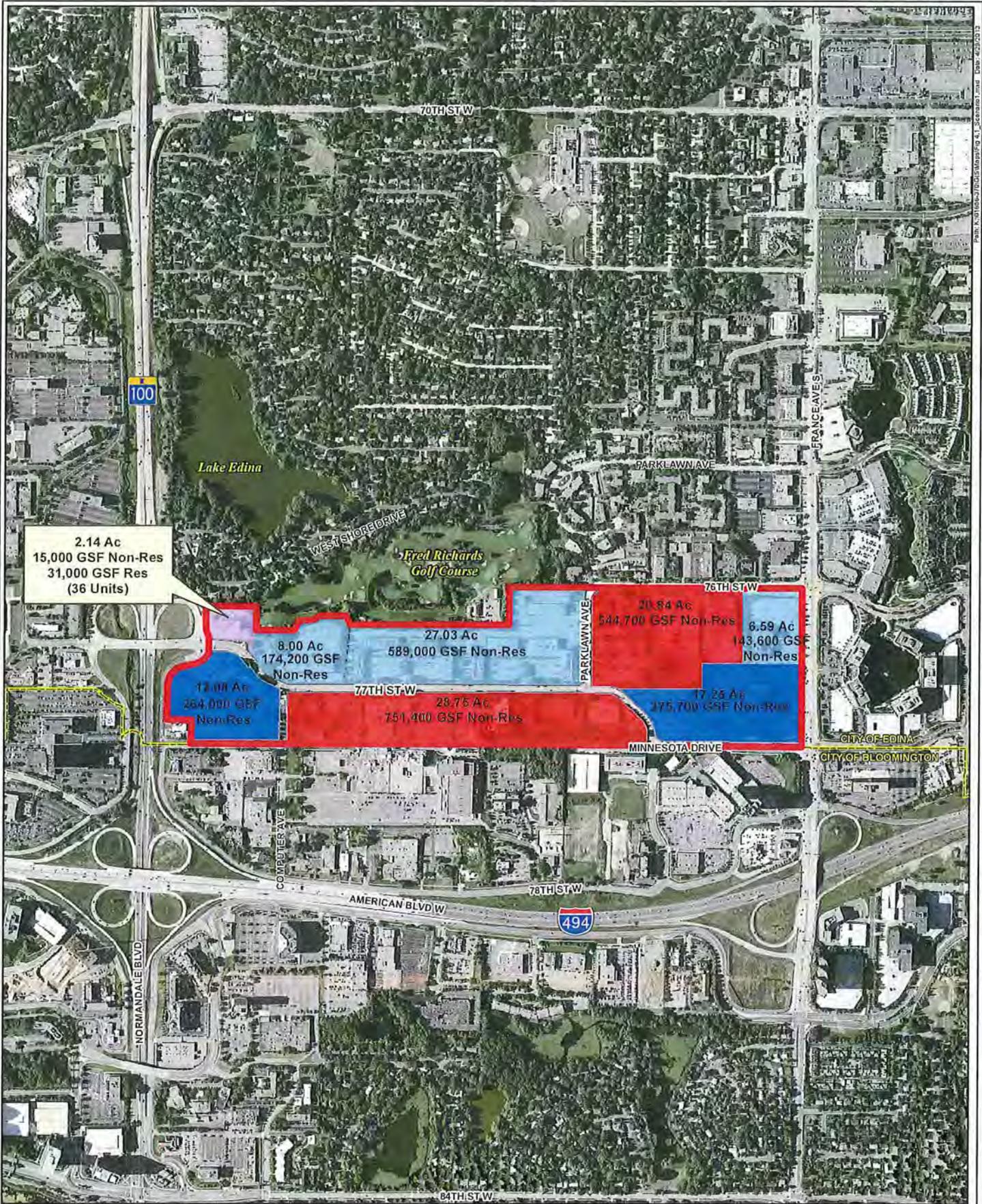




**Figure 3**  
**Aerial Location Map**  
**Gateway AUAR**

- Legend**
- Gateway AUAR Study Area
  - Pentagon Quads
  - Pentagon Towers

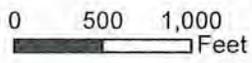


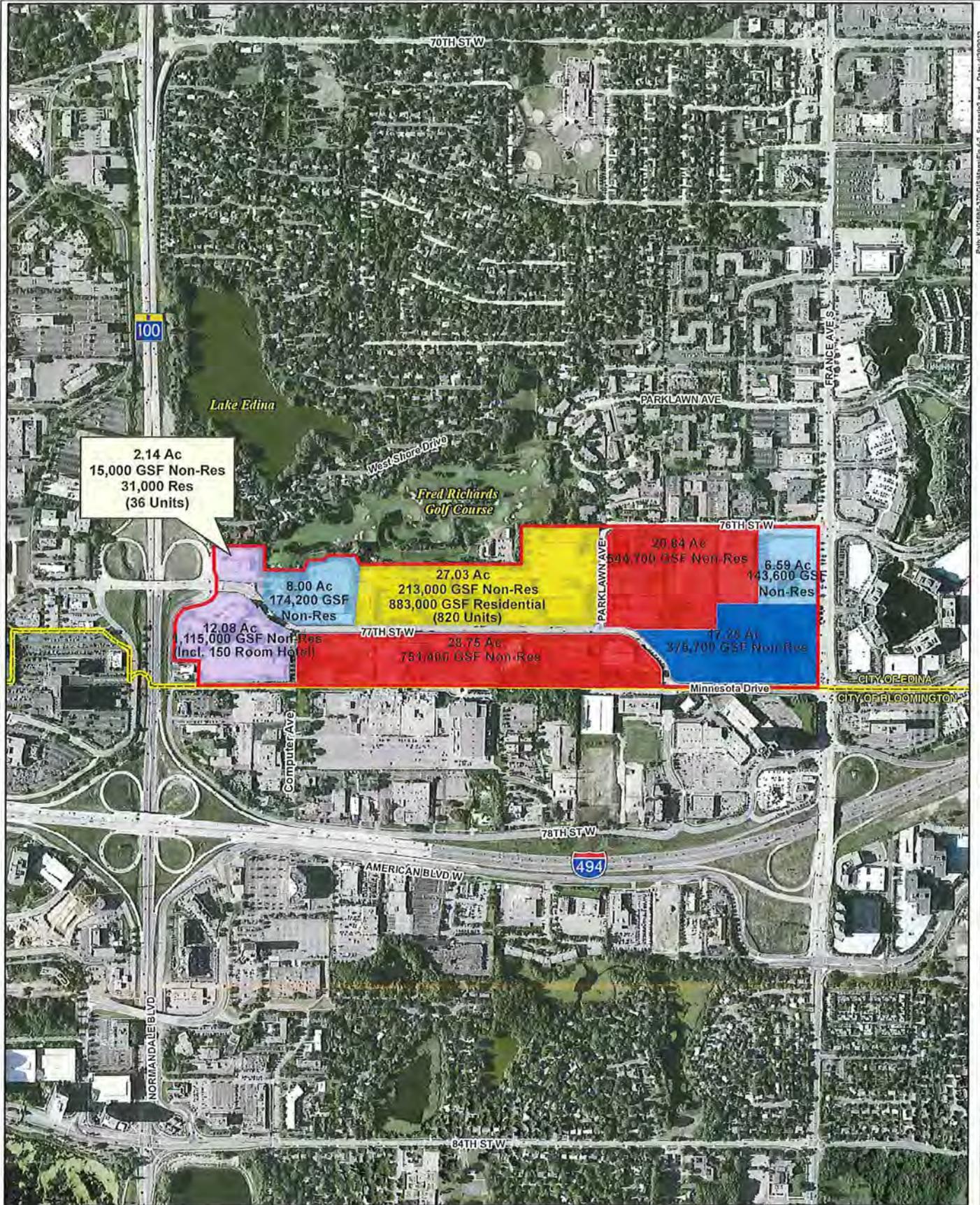


**Figure 4-1**  
**Gateway AUAR**  
**Scenario 1:**  
**Comprehensive Plan**

**Legend**

- Gateway AUAR
  - POD-1
  - PCD-3
  - PID
  - POD-2
- \* GSF = Gross Square Feet





**Figure 4-2**  
**Gateway AUAR**  
**Scenario 2:**  
**Master Plan**

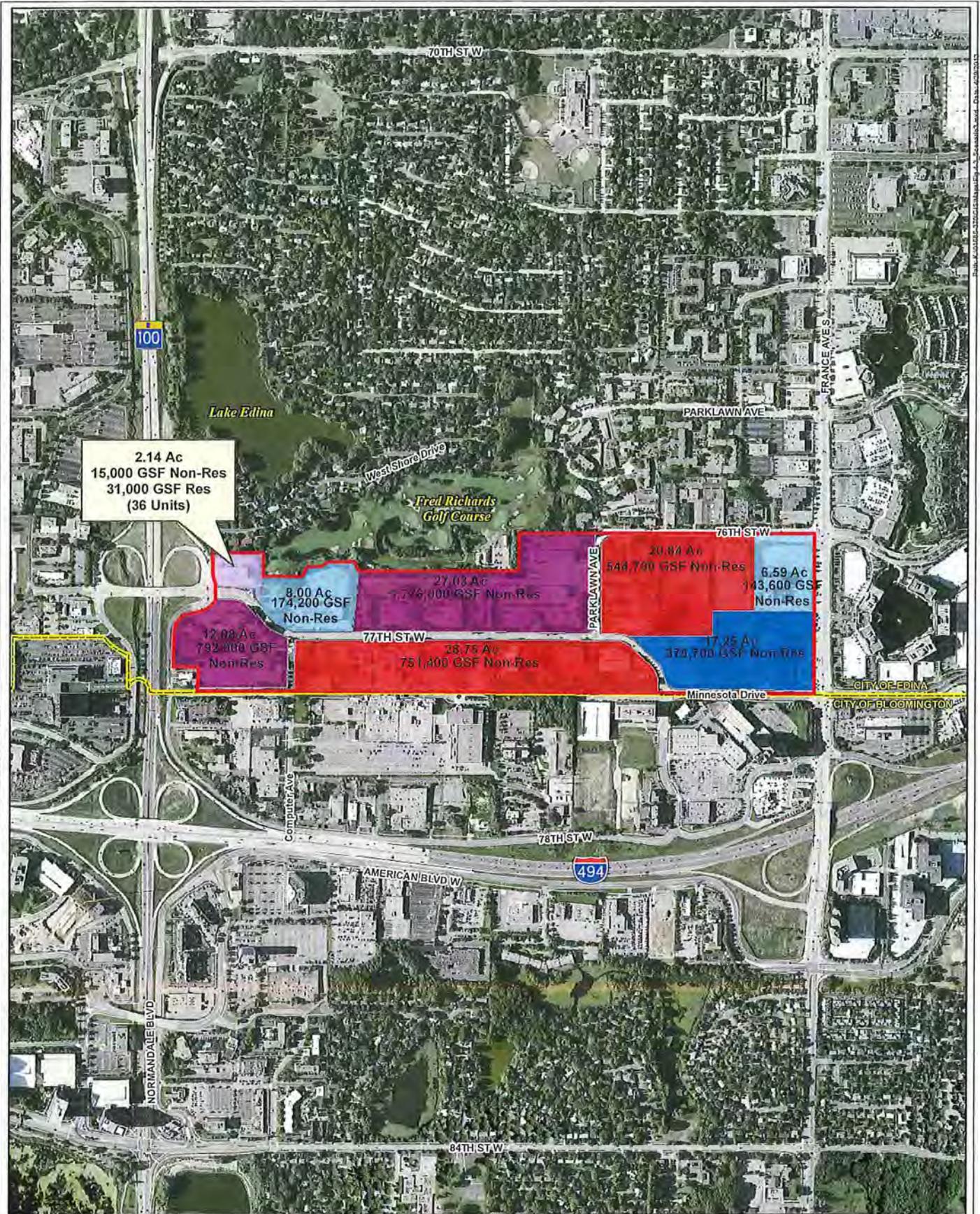
**Legend**

- Gateway AUAR
- POD-1
- PCD-3
- PID
- POD-2
- PSR-4

\* GSF = Gross Square Feet

0 500 1,000 Feet





**Figure 4-3**  
**Gateway AUAR**  
**Scenario 3**

**Legend**

- Gateway AUAR
  - POD-1
  - PCD-2
  - PID
  - POD-2
  - PCD-3
- \* GSF = Gross Square Feet

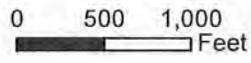
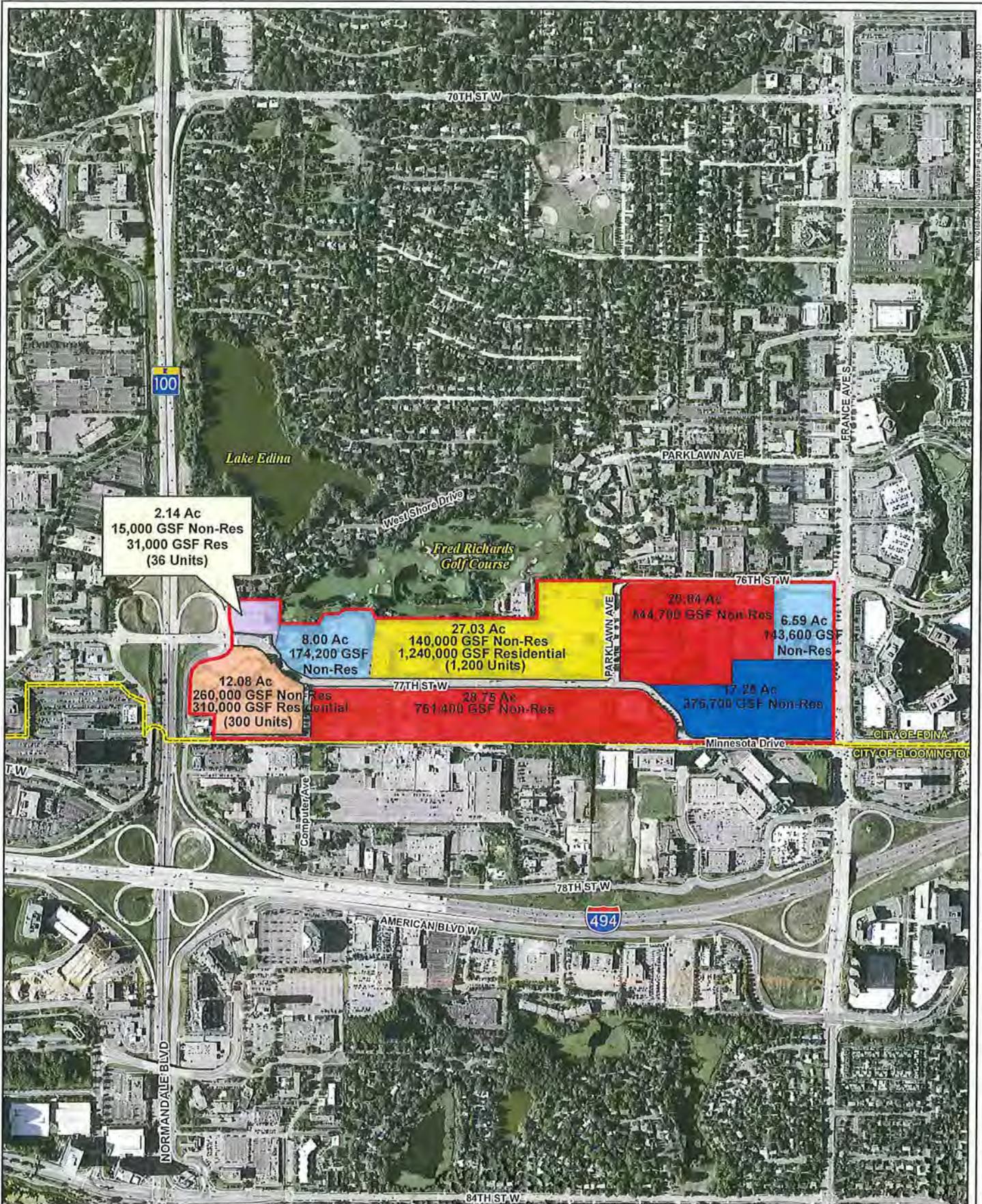


Photo courtesy of Google Earth, City of Edina, and City of Bloomington



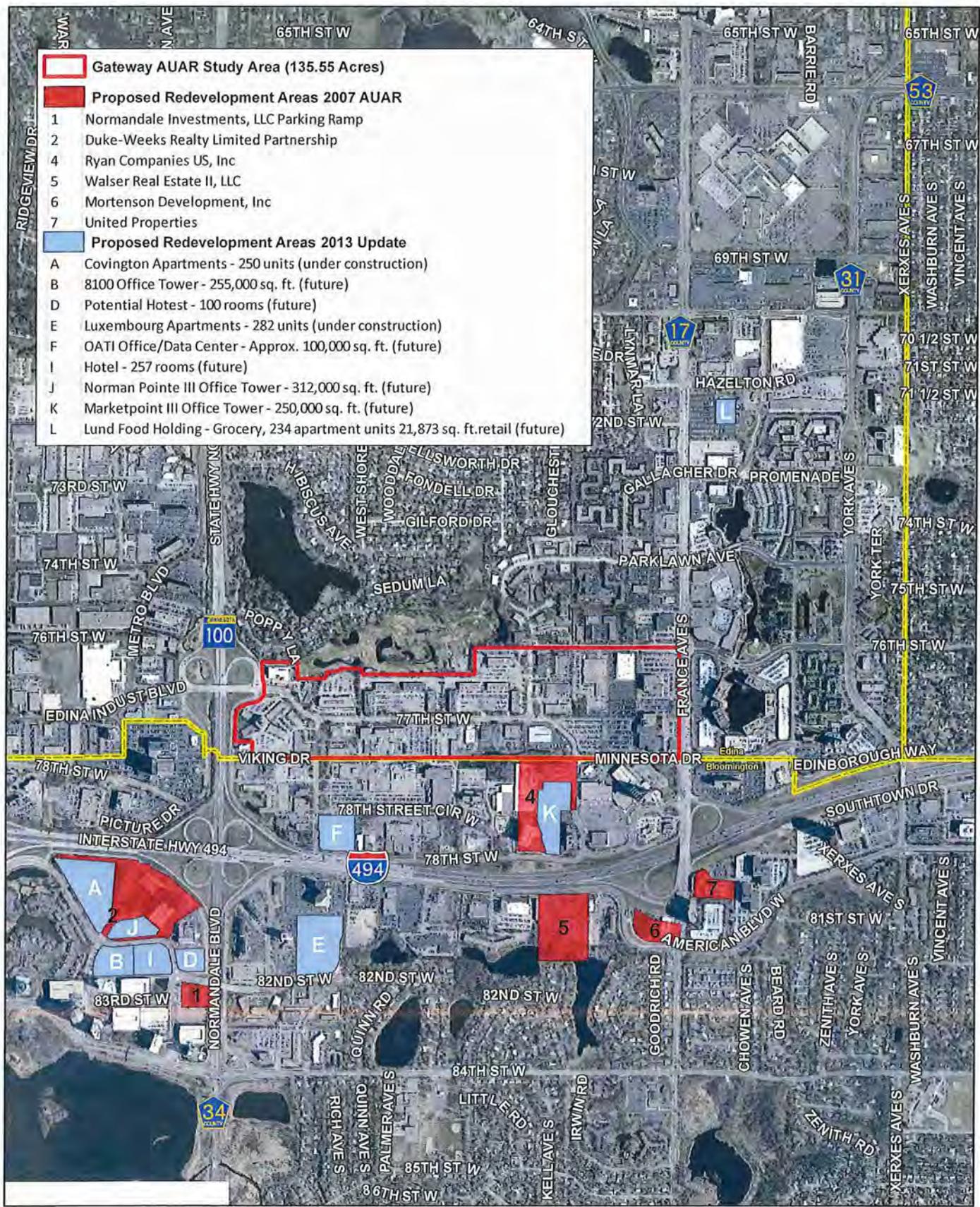
**Figure 4-4**  
**Gateway AUAR**  
**Scenario 4**

**Legend**

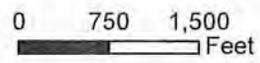
- MDD-5
- POD-1
- PCD-3
- Gateway AUAR
- PID
- POD-2
- PSR-4

\* GSF = Gross Square Feet





**Figure 5**  
**Adjacent Developments Map**  
**Gateway AUAR**



## **Appendix B – Agency Correspondence**

**From:** [Bump, Samantha \(DNR\)](#)  
**To:** [Andi Moffatt](#)  
**Cc:** [Doperalski, Melissa \(DNR\)](#)  
**Subject:** RE: Data Request - Edina AUAR Update  
**Date:** Wednesday, March 27, 2013 12:39:11 PM

---

Hi Andi,  
I have reviewed the NHIS regarding the above project. There are no new records in the vicinity of the project. As such, the Natural Heritage letter dated 4 April 2007 is still valid.

Thank you for consulting us on this matter. If you have any further questions, please feel free to contact me.

Have a great day,  
Samantha Bump  
NHIS Review Technician  
(651) 259-5091  
Division of Ecological and Water Resources  
Minnesota Department of Natural Resources  
500 Lafayette Road, Box 25  
St. Paul, MN 55155

[samantha.bump@state.mn.us](mailto:samantha.bump@state.mn.us)  
[www.mndnr.gov/eco](http://www.mndnr.gov/eco)

---

**From:** Andi Moffatt [<mailto:AMoffatt@wsbeng.com>]  
**Sent:** Thursday, March 21, 2013 12:59 PM  
**To:** \*NHIS, Review (DNR)  
**Cc:** Doperalski, Melissa (DNR)  
**Subject:** Data Request - Edina AUAR Update

Hi Lisa and Melissa - attached is an NHIS request (full request, not review our assessment) for the Edina Gateway AUAR Update. The original AUAR was done in 2007 and ERBD number at that time was 20070643. Let me know if you need anything else for this request. Thanks!

Andi Moffatt, PWS  
Environmental Planning & Natural Resources Group Manager, Principal  
d: 763-287-7196 | c: 612-360-1301  
WSB & Associates, Inc. | 701 Xenia Avenue South, Suite 300 | Minneapolis, MN 55416



Engineering • Planning  
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## Responses to Comments of the Gateway AUAR Update

August 26, 2013

An Alternative Urban Areawide Review (AUAR) was prepared for the Gateway Study Area. The comment period ended August 19, 2013. Comments were received from the Metropolitan Council, Hennepin County, and Minnesota Department of Transportation. A summary of the comments received are outlined below along with responses to these comments. The original comment letters are attached for reference.

Summarized Comment	Response
<b>Metropolitan Council</b>	
Met Council concluded the AUAR Update is complete and accurate.	No response necessary.
The AUAR Update notes that a Comprehensive Plan submittal may be needed depending on the development scenario. The City can work with the Met Council if this scenario is chosen.	If a Comprehensive Plan amendment is needed based on future proposed development, the City will contact and coordinate with the Met Council.
Regarding water system capacity improvements within Edina and Bloomington, there is potential for well interference, potential impacts of groundwater pumping, and vulnerability to contamination. If additional water	Mitigation item D6 has been revised to include the following: "Additionally, potential for well interference, impact of groundwater pumping on surface waters, and vulnerability to contamination will need to be reviewed if additional water appropriations are needed."

August 26, 2013

Page 1 of 6

appropriations are needed, this should be addressed.	
The study area is within the Drinking Water Supply Management Area for Edina. Storm water management for development should take this into consideration.	Storm water will be managed to meet local and state guidelines.
The Met Council is currently reviewing the sanitary sewer system capacity in this area. Additional information regarding timing of development should be provided to the Met Council as this information becomes available.	Comment is noted.
Three Rivers Park District has planned for the Nine Mile Creek Regional Trail to border the Gateway Study Area. The City is encouraged to work with Three Rivers Park District to facilitate the development of the regional trail through this area.	Mitigation Item K1 has been added that states the following: "The City will coordinate with the Three Rivers Park District to facilitate development of the Nine Mile Creek Regional Trail in the study area."

**Minnesota Department of Transportation**

*MnDOT re-submitted their comment letter from the 2007 AUAR. Responses to these comments were provided with the Final AUAR in 2007. Those responses are provided here for ease of review.*

<p>In reviewing the draft AUAR, there will be substantial increased traffic demands for TH 100 (both directions) and I494 west of East Bush Lake Road (both directions). Please note that Mn/DOT has no immediate plans to expand TH 100 or I494 in that area.</p>	<p>The City is aware that there are no immediate plans to expand TH 100 and I-494. No changes to AUAR are needed.</p>
<p>Page 66, Table 21-1 describes its source as "Derived from Highway Capacity Manual (2000)". Level of Service is generally a measure of hourly traffic flow, rather than a measure of daily traffic. It would be possible for the daily traffic to be at a level that would appear uncongested, but for the peak periods, to still experience congestion. Therefore, the Level of Service should be derived from the peak period.</p>	<p>Capacity assessment based on daily traffic volumes has been removed from the Final AUAR, including removing Table 21-1, Table 21-7, and modification to Table 21-14. The methodology used is a common planning level analysis for typical development. This methodology has shown to be less applicable to France Avenue due to the traffic flow patterns near a high volume interchange (I-494). Capacity assessment will be limited to peak hour traffic modeling. The Final AUAR has been revised.</p>
<p>Mn/DOT has adopted Table 21-3 as a universal freeway assessment standard. Therefore it is suggested that Table 21-4 on Page 69 be removed and only Table 21-3 be used.</p>	<p>Table 21-4 Ramp Junction Level of Service Measures has been removed and Table 21-21 Future (2014) Freeway Level of Service has been modified to use the Table 21-3 Freeway Level of Service Measures Criteria. The Final AUAR has been revised.</p>
<p>Throughout the document, there are several references to Bush Lake Road. Mn/DOT believes these references should be East Bush Lake Road.</p>	<p>This change has been made to the Final AUAR.</p>
<p>There should be discussion regarding traffic impacts to the loops at the I-494/France Avenue interchange. Also, Mn/DOT would appreciate discussion of specific traffic impacts from the</p>	<p>Ramp/loop analysis has been added to sections 21.B3 and 21.C1(ii) including ramp/loop volume increases and capacities. The Final AUAR has been revised.</p>

<p>proposed redevelopment on the TH 100/I-494 interchange, particularly the south to east movement. Even if these impacts cannot be easily mitigated, they should be quantified.</p>	
<p>The mitigation plan includes construction of an eight-lane bridge at the TH 100/West 77<sup>th</sup> Street interchange. There is no funding allocated in Mn/DOT's 20-Year Transportation System Plan for the reconstruction of this interchange.</p>	<p>The City is aware Mn/DOT has no plans or funding to improve the TH 100/West 77<sup>th</sup> Street interchange in the 20-year Transportation System Plan. No changes to the AUAR are needed.</p>
<p>Mn/DOT's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from this highway could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation. Minnesota Rule states that municipalities are responsible for taking all reasonable measures to prevent land use activities listed in the MPCA's Noise Area Classification where the establishment of the land use would result in violations of established noise standards.</p> <p>Mn/DOT policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures in such areas.</p>	<p>The City is aware that any noise mitigation measures would be addressed by the City or Developer and would not have any Mn/DOT funding participation. No changes to the AUAR are needed.</p>
<p>Any work impacting Mn/DOT right-of-way will also require a permit.</p>	<p>Any project proposer will be responsible for obtaining necessary permits. Permits from Mn/DOT are listed in Item 8 of the AUAR. No revisions to the AUAR are needed.</p>

### Hennepin County Comments

<p>France Avenue currently experiences moderate vehicle delay and queuing along the corridor. With a high percentage of southbound traffic on France destined for I-494, the unbalanced lane utilization leads to weaving and traffic queues that spill back to upstream intersections. <i>(Similar comment to 2007 AUAR)</i></p>	<p>The analysis and findings of the traffic analysis used the SimTraffic micro-simulation traffic analysis software to assess the impacts of the proposed development scenarios. This analysis software is specifically suited to analyze similar situations as France Avenue. No changes to the AUAR are needed.</p>
<p>What traffic operations analysis tool was used in the 2007 AUAR? What were the detailed findings of the 2007 AUAR?</p>	<p>The 2007 AUAR contains the detailed findings of the traffic analysis. The arterial level of service assessment was completed using the SimTraffic micro-simulation traffic analysis software. SimTraffic is designed to model networks of signalized and unsignalized intersections. SimTraffic is especially useful for analyzing complex situations that are not easily modeled macroscopically (using Highway Capacity Manual methods) including:</p> <ul style="list-style-type: none"> <li>• Closely spaced intersections with blocking problems</li> <li>• Closely spaced intersections with lane change problems</li> <li>• The effects of signals on nearby unsignalized intersections and driveways</li> <li>• The operation of intersections under heavy congestion</li> </ul> <p>All of these issues are present in the Gateway Area, therefore SimTraffic was the tool chosen to analyze the traffic operations, and is the Mn/DOT accepted tool for arterial traffic analysis. No changes to the AUAR are needed.</p>
<p>Background traffic growth rate on France seemed low. What is the updated forecast ADT for this roadway with background growth and development trips for the various scenarios?</p>	<p>Table 21-14 and associated text in the 2007 AUAR was revised. The Average Daily Traffic (ADT) volume forecast has been revised. The forecast methodology used to derive the peak hour traffic forecast has been applied to the daily traffic forecasts. The revised forecast ADT's show an annual growth rate more similar to the 0.5% listed in previous studies. No changes to the AUAR are needed.</p>

<p>Signing should be considered on France in various locations to reduce weaving.</p>	<p>This type of mitigation will be considered as development is proposed in the area. As indicated in Mitigation G4 – General, the mitigation measures outlined in the AUAR are for the full build out of the site and surrounding area. Specific measures required for the proposed development plans will be established through traffic and transportation studies required for each development proposal. No changes to the AUAR are needed.</p>
<p>Access management along France should be implemented as traffic increases.</p>	<p>As discussed in the previous response to comments, this type of mitigation will be considered as development is proposed in the area. No changes to the AUAR are needed.</p>
<p>Some of the mitigation strategies involve lane designations that are not frequently used by motorists, such as dual right turns. These improvements should be studied further to determine potential safety impacts on vehicles, pedestrians, and bicyclists.</p>	<p>As indicated in Mitigation G4 – General, the mitigation measures outlined in the AUAR are for the full build out of the site and surrounding area. Specific measures required for the proposed development plans will be established through traffic and transportation studies required for each development proposal. Impacts of specific mitigation measures will be completed with the detailed analysis. No changes to the AUAR are needed.</p>
<p>It is unclear to what level of detail the feasibility of the mitigation elements have been studied. The document should summarize the details of the traffic operations analysis and access constraints, impacts, and likely cost options.</p>	<p>The AUAR and the Update are planning level documents and as such, the level of detail on the traffic study is commensurate with that level of detail. A specific engineering level feasibility or preliminary design has not been completed, nor have costs been developed as that is beyond the scope of and AUAR. As development is proposed, the City will coordinate with the County to evaluate specific road improvements and associated costs. No changes to the AUAR are needed.</p>
<p>The County believes that the AUAR is incomplete from a traffic standpoint due to impacts to France Avenue.</p>	<p>As indicated in the previous response to comments, the AUAR is a planning level document. Detailed analysis and mitigation improvements will be analyzed and recommended as specific development proposals are submitted. No changes to the AUAR are needed.</p>



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

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

Phone: 612-348-4077

Fax: 612-348-9710

www.hennepin.us

August 19, 2013

Mr. Cary Teague  
City of Edina  
4801 West 50th Street  
Edina, MN 55424

Re: Comment to the Alternative Urban Areawide Review Update – Gateway Study Area

Dear Mr. Teague:

This letter provides comments on the July 2013 Alternative Urban Areawide Review (AUAR) Update for the Gateway Study Area located north of Minnesota Drive, south of West 76th Street, east of Trunk Highway (TH) 100 and west of CSAH 17 (France Avenue), in the City of Edina. The original AUAR was adopted by the City in September 2007. Hennepin County provided comments to the draft AUAR on August 9, 2007 (see below). This memo provides a follow-up to our initial comments, in addition to a review of the updated traffic mitigation proposed in the 2013 AUAR Update.

**Comments on 2007 AUAR**

Based on our initial comment letter in response to the 2007 Gateway Study Area AUAR, the county had the following concerns regarding traffic operations along France Avenue and anticipated traffic growth. The 2013 AUAR Update does not provide sufficient information to determine if our initial comments have been addressed.

- The operations analysis for existing conditions in the 2007 Gateway Study Area AUAR indicated that the key intersections along France Avenue were “uncongested.” Based on county experience within the study area and prior observations of traffic operations along this corridor, France Avenue currently experiences moderate vehicle delay and queuing along the corridor. With a high percentage of southbound traffic on France Avenue that is destined for the I-494 ramps (55% based on Hennepin County studies) the unbalanced lane utilization leads to weaving and traffic queues that spill back to upstream intersections.
- Due to the close intersection spacing and complexity of the roadway network, the use of a microscopic traffic model such as SimTraffic is necessary to assess the traffic impacts along the corridor. This is particularly true with the lane imbalance on France Avenue between West 76th Street and the I-494 ramp intersections. What traffic operations analysis tool was used in the 2013 AUAR Update? What were the detailed findings of the original 2007 Gateway Study Area AUAR traffic analysis?
- The background growth rate assumed on France Avenue between West 76th Street and Minnesota Drive seemed low in the 2007 analysis. The current ADT on France Avenue, between West 76th Street and Minnesota Drive is 31,200 vehicles per day (2012 counts). This now exceeds the original 2030 traffic volume projections (29,600 ADT) for Scenarios 1 and 4 in the 2007 Gateway Study Area AUAR. What is the updated forecast ADT on this section of roadway with background growth and development trips for the various scenarios?

**Comments on 2013 AUAR Update (Traffic and Transportation)**

Pages 12 -13 of the 2013 AUAR Update identifies the mitigation strategies needed for the development scenarios 1-4. The following points provide general comments on the mitigation measures regarding access management, vehicle weaving and traffic signing considerations on France Avenue.

- Southbound France Avenue, between West 76th Street and the I-494 ramps is a relatively short roadway section with minimal weaving distance for vehicles to access the I-494 east and west ramps. Advanced signing will be key in directing motorists into the correct lane to minimize the weaving that may occur as they approach I-494. In addition to signing on France Avenue, advance signing should be considered on West 78th Street and Minnesota Drive for the following movements to guide motorists into the correct lane before they turn onto France Avenue:
  - Eastbound dual right-turn lanes on West 78th Street
  - Westbound dual left-turn lanes on Minnesota Drive
  - Eastbound dual right-turn lanes on Minnesota Drive
- Access management along France Avenue should be implemented as traffic volumes continue to increase between West 76th Street and the I-494 West Ramp. Research has consistently shown that crash rates increase as access density increases. Possible strategies to reduce the current number of driveways and share access between multiple properties should be considered. For example, the gas station driveway on France Avenue just north of the westbound I-494 on-ramp is a significant concern.
- Some of the mitigation strategies involve lane designations that are not frequently used by motorists at standard full-access intersections, such as dual right-turn lanes. These intersection improvements should be studied further at similar types of intersections to determine potential safety impacts. In addition, the effect of these mitigation elements on bicycle and pedestrian traffic should also be evaluated.
- As with the original 2007 Gateway Study Area AUAR, it is unclear to what level of detail the feasibility of the mitigation elements have been studied. The document should summarize the details of the traffic operations analysis and address the constraints, impacts, and the likely cost options for the proposed mitigation measures.

### Summary

In conclusion, we believe that the 2013 AUAR Update is incomplete from a traffic/transportation standpoint as it is currently presented. The eventual full redevelopment of the Gateway study area may have significant impacts to the operations of France Avenue, especially in the vicinity of the I-494 ramps. Serious consideration needs to be given for traffic mitigation beyond those measures mentioned in the 2013 AUAR Update.

I appreciate your consideration of Hennepin County comments at this time and look forward to your response. If you have any questions, please contact me (612-348-5714) or Bob Byers at (612) 596-0354 [robert.byers@co.hennepin.mn.us](mailto:robert.byers@co.hennepin.mn.us) or Carla Stueve at (612) 596-0356 [carla.stueve@co.hennepin.mn.us](mailto:carla.stueve@co.hennepin.mn.us).

Sincerely,

  
 David Jaeger  
 Manager, Environmental Policy

cc: Jim Grube, Director of Transportation and County Engineer  
 Tom Johnson, Manager Transportation Planning

August 14, 2013

Cary Teague  
City of Edina  
4801 W. 50<sup>th</sup> Street  
Edina, MN 55424

**RE: City of Edina, Gateway Study Area, AUAR Update**  
Metropolitan Council Review File No. 20052-3  
Metropolitan Council District 5

Dear Mr. Teague:

The Metropolitan Council received the City of Edina's (City) Alternative Urban Area Review (AUAR) Update for the Gateway Study Area on July 30, 2013. The City of Edina adopted the Final AUAR for the Gateway Study Area on November 5, 2007. Pursuant to Minnesota Rules 4410.3610 Subp. 7, an AUAR must be updated every five years in order to remain valid.

Council staff has conducted a review of this AUAR Update to determine its accuracy and completeness in addressing regional concerns. The staff review has concluded that the AUAR Update is complete and accurate with respect to regional concerns and raises no major issues of consistency with Council policies. However, staff offers the following technical comments in response to *Section V: Mitigation Summary and Update*.

**Land Use Compatibility and Permitting, p. 7** (Todd Graham, 651-602-1322)

The AUAR Update acknowledges that if one of the alternative land use scenarios is pursued (Scenario 2, 3 or 4), a Comprehensive Plan Amendment would be required. At the time of amendment submittal, Metropolitan Council and City staff can discuss an upward revision of the population and/or employment forecasts that would likely accompany a review submittal to the Metropolitan Council.

**Municipal Water Use and Service, pp. 9-10** (Lanya Ross, 651-602-1803)

The AUAR notes that Edina will work with Bloomington to determine the needs for water system capacity improvements, water main upgrades, and future service to the area. The *Metropolitan Area Master Water Supply Plan*, jointly approved by the Metropolitan Council and Minnesota Department of Natural Resources in 2010, states that "prior to requesting additional appropriations or as part of future updates to local water supply plans, communities will need to outline the actions to address issues identified in the community profiles". Considering both Edina and Bloomington's profiles, there is potential for well interference, potential impacts of groundwater pumping on surface water features (including trout habitat or calcareous fen), and significant vulnerability to contamination. This information should be included under item D6.

**Water Quality and Quantity, p. 10** (Lanya Ross, 651-602-1803)

This section lays out actions to address surface water quality and quantity. These should include actions to address possible impacts to local drinking water supplies by stormwater management and infiltration. The project site is located within two *Drinking Water Supply Management Areas* (Edina wells #10 and #11), both of which have been designated as highly vulnerable to contamination by the City and the Minnesota Department of Health (MDH). MDH provides guidance for stormwater infiltration in vulnerable drinking water areas.

Cary Teague  
August 14, 2013  
Page 2

**Wastewater Mitigation Plan, p. 11** (Roger Janzig, 651-602-1119)

Metropolitan Council staff is currently reviewing the capacity in this area for future regional improvements. Additional information regarding timing of development, as it becomes available, should be submitted to the Council to assist with the planning of these improvements.

**Transit/Non-Motorized Transportation, p. 13** (Jan Youngquist, 651-602-1029)

Three Rivers Park District has prepared a master plan for the Nine Mile Creek Regional Trail, which will travel through Edina as it connects the Minnesota River Bluffs LRT Regional Trail in Hopkins to the Minnesota National Wildlife Visitor Center in Bloomington. The regional trail alignment is planned to be located on the border of the Gateway Study Area and the Fred Richards Golf Course. This section of the AUAR Update should acknowledge the planned regional trail. Council staff encourages the City to work with Three Rivers Park District to facilitate the development of the regional trail through this area.

This will conclude the Council's review of the AUAR. The Council will take no formal action on the AUAR. If you have any questions or need further information, please contact the listed technical reviewer or Michael Larson, Principal Reviewer, at 651-602-1407.

Sincerely,



LisaBeth Barajas, Manager  
Local Planning Assistance

cc: Julie Monson, Minnesota Housing  
Tod Sherman, Development Reviews Coordinator, MnDOT Metro  
Steve Elkins, Councilmember, District 5  
Michael Larson, Sector Representative/Principal Reviewer  
Raya Esmaeili, Reviews Coordinator



Minnesota Department of Transportation

Metropolitan District  
Waters Edge  
1500 West County Road B-2  
Roseville, MN 55113-3174

August 15, 2007

Mr. Cary Teague  
Planning Director  
City of Edina  
4801 West 50<sup>th</sup> Street  
Edina, MN 55424

Subject: Gateway Study Area Draft Alternative Urban Areawide Review (AUAR)  
Minnesota Department of Transportation (Mn/DOT) Review # AUAR07-003  
TH 100 and 70<sup>th</sup> Street  
City of Edina/ Hennepin County  
Mn/DOT Control Section # 2733

Dear Mr. Teague:

Thank you for the opportunity to review the Gateway Study AUAR. Please note that Mn/DOT's review of this AUAR does not constitute approval of a regional traffic analysis and is not a specific approval for access or new roadway improvements. As plans are refined, we would like the opportunity to meet with our partners and to review the updated information. Mn/DOT's staff has reviewed the document and has the following comments:

*Traffic:*

In reviewing the draft AUAR, there will be substantial increased traffic demands for TH 100 (both directions) and I494 west of East Bush Lake Road (both directions). Please note that Mn/DOT has no immediate plans to expand TH 100 or I494 in that area.

Page 66, Table 21-1 describes its source as "Derived from Highway Capacity Manual (2000)". Level of Service is generally a measure of hourly traffic flow, rather than a measure of daily traffic. It would be possible for the daily traffic to be at a level that would appear uncongested, but for the peak periods, to still experience congestion. Therefore, the Level of Service should be derived from the peak period.

Mn/DOT has adopted Table 21-3 as a universal freeway assessment standard. Therefore it is suggested that Table 21-4 on Page 69 be removed and only Table 21-3 be used.

Throughout the document, there are several references to Bush Lake Road. Mn/DOT believes these references should be East Bush Lake Road.

There should be discussion regarding traffic impacts to the loops at the I-494/France Avenue interchange. Also, Mn/DOT would appreciate discussion of specific traffic impacts from the proposed redevelopment on the TH 100/I-494 interchange, particularly the south to east movement. Even if these impacts can not be easily mitigated, they should be quantified.

The mitigation plan includes construction of an eight-lane bridge at the TH 100/West 77th Street interchange. There is no funding allocated in Mn/DOT's 20-Year Transportation System Plan for the reconstruction of this interchange.

Please feel free to direct questions regarding these issues to Jolene Servatius, of Mn/DOT's Traffic Support Section, at (651) 234-7841, or Wayne Norris, Mn/DOT's West Area Engineer, at (651) 234-7724.

*Residential Noise Statement:*

Mn/DOT's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from this highway could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation. Minnesota Rule 7030.0030 states that municipalities are responsible for taking all reasonable measures to prevent land use activities listed in the MPCA's Noise Area Classification (NAC) where the establishment of the land use would result in violations of established noise standards.

Mn/DOT policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures in such areas. The project proposer should assess the noise situation and take the action deemed necessary to minimize the impact of any highway noise. If you have any questions regarding Mn/DOT's noise policy please contact Peter Wasko in our Design section at (651) 234-7681.

*Permits:*

Any work impacting Mn/DOT right of way will also require a permit. Permit forms are available from Mn/DOT's utility website at [www.dot.state.mn.us/tecsup/utility](http://www.dot.state.mn.us/tecsup/utility). Please include one full size plan set and one 11" x 17" plan set with each permit application. Please direct any questions regarding permit requirements to Buck Craig, Mn/DOT's Metro Permits Section, at (651) 234-7911.

As a reminder, please address all initial future correspondence for development activity such as plats and site plans to:

Development Review Coordinator  
Mn/DOT - Metro Division  
Waters Edge  
1500 West County Road B-2  
Roseville, Minnesota 55113

Mn/DOT document submittal guidelines require three (3) complete copies of plats and two (2) copies of other review documents including site plans. Failure to provide three (3) copies of a plat and/or two (2) copies of other review documents will make a submittal incomplete and delay Mn/DOT's 30-day review and response process to development proposals.

We appreciate your anticipated cooperation in providing the necessary number of copies, as this will prevent us from having to delay and/or return incomplete submittals.

If you have any questions, please feel free to contact me at (651) 234-7797.

Sincerely,

William Goff  
Intermediate Planner

cc: Bob Byers, Hennepin County Transportation Planning Section, Medina, MN  
Andrea Moffatt, WSB & Associates, Minneapolis, MN

File copy to:  
Mn/DOT LGL file: City of Edina/Hennepin County  
Mn/DOT District file: CS: 2733

**Copy via Groupwise:**

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