

**Appendix C**  
Responses to Comments and Comment Letters



**Memorandum**

**To:** *Ronald Wieland, Department of Natural Resources  
William Goff, Minnesota Department of Transportation  
James Nelson, Eberhardt Advisory  
Kevin Bigalke, Nine Mile Creek Watershed District  
Phyllis Hanson, Metropolitan Council  
Tom Gastler  
Robert Byers, Hennepin County Transportation Department  
Gene Winstead, Mayor of Bloomington  
Rick Beaver, Seagate  
Nels Nelson  
Bette Anderson  
Neil Peterson*

**From:** *Andrea Moffatt, WSB & Associates*

**Date:** *September 26, 2007*

**Re:** *Responses to Comments  
Draft AUAR – Gateway Study Area , Edina, MN  
WSB Project No. 1686-04*

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On behalf of the City of Edina, please find outlined below responses to comments received on the Draft Gateway Study Area Alternative Urban Areawide Review (AUAR). The comment period ended on August 15, 2007. Comments were received by the deadline from Eberhardt Advisory, LLC; Nine Mile Creek Watershed District; Metropolitan Council; Tom Gastler; Hennepin County Transportation Department; City of Bloomington; Rick Beaver (at Seagate); Nels Nelson; Bette Anderson; Neil Peterson (Lindue LLC). Comments were received after the deadline from MnDOT and the DNR. All comments received are outlined below with responses provided. The comment letters are also attached.

**Comments from DNR**

**Comment 1: Item No. 17 Water Quality – Surface Water Runoff (pp. 40-44):** This item indicates that the existing storm water ponding is insufficient and that the receiving water, Nine Mile Creek, is impaired for turbidity, chloride and biota. This item suggests the use of low impact techniques to reduce impervious surfaces. Along that line, we might recommend that the developer utilize pervious pavement and pavers for parking lots and walkways, and design buildings with systems to capture and store precipitation for use in lawn watering, flush toilets, etc. This would help address both the storage and stream impairment problems.

**Response:** This recommendation will be shared with any developers for the area. The City will also encourage the use of Low Impact Development techniques to address storm water management in the area. No change to the AUAR is needed.

**Comments from MnDOT**

**Comment 1:** 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.

**Response:** The City is aware that there are no immediate plans to expand TH 100 and I-494. No changes to AUAR are needed.

**Comment 2:** 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.

**Response:** 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.

**Comment 3:** 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.

**Response:** 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.

**Comment 4:** Throughout the document, there are several references to Bush Lake Road. Mn/DOT believes these references should be East Bush Lake Road.

**Response:** This change has been made to the Final AUAR.

**Comment 5:** 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 cannot be easily mitigated, they should be quantified.

**Response:** 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.

**Comment 6:** 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.

**Response:** 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.

**Comment 7:** 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.

**Response:** 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.

**Comment 8:** 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.

**Response:** 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.

#### **Comments from Eberhardt Advisory**

**Comment 1:** The Draft AUAR represents a solid effort to address the potential environmental consequences of the redevelopment levels in the Gateway Study Area. With the addition of certain information more fully described below and other changes, the *Gateway Study Area Final Alternative Urban Areawide Review* ("Final AUAR") and the *Final Mitigation Plan for Gateway Study Area* ("Final Mitigation Plan") should accurately and completely portray these consequences.

**Response:** No response is necessary.

**Comment 2: 6. Description, B. Description of Redevelopment Scenarios, Tables 6-2 and 6-3.** Gateway Development's proposal for development on the Pentagon Towers and Pentagon Quads sites results in significantly less development than Scenario 2. We have reproduced below Tables 6-2 and 6-3 and added lines labeled "2D" that show the density of Gateway Development's proposal to indicate this difference.

**Table 6-2. Summary of Redevelopment Scenarios\***

Scenario	Office Space			Office Space, Warehousing, & Light Industrial		Retail & Commercial (Mixed Use)		Housing & Residential (Mixed Use)		Hotel	
	Total Acres Developed	Acres	Gross Square Feet (in millions)	Acres	Gross Square Feet (in millions)	Acres	Gross Square Feet (in millions)	Units	Gross Square Feet (in millions)	Rooms	Gross Square Feet (in millions)
1	122.68	70.95	1.546	49.59	1.296	2.14	0.015	36	-	-	-
2	122.68	31.84	1.862	49.59	1.296	41.25 <sup>a</sup>	0.094	856	0.914	150	0.080
2D	39.7	11.08	1.168	0	0	1.8	.080	820	.883	150	.080
3	122.68	70.95	3.261	49.59	1.296	2.14	0.015	36	-	-	-
4	122.68	31.84	1.094	49.59	1.296	41.25 <sup>b</sup>	0.015	1,536	1.581	-	-

\* Calculations do not take into account existing or proposed wetlands, storm ponds, roads, right-of-way, or utility easements in the Gateway Study Area.

<sup>a</sup> Acreage includes mixed use development with commercial, retail, and office space applications.

<sup>b</sup> Acreage includes mixed use development with office space applications.

**Table 6-3: Comparison of Redevelopment Scenarios with Existing Conditions**

	Existing Conditions	Scenario 1: Comp Plan	Scenario 2: Master Plan	Scenario 2D: Developer's Plan	Scenario 3: Maximum Commercial	Scenario 4: Maximum Residential
Office	1,873,000	1,546,000	1,862,000	1,168,000?	3,261,000	1,094,000
Commercial/Retail/Hotel		15,000	174,000	160,000	15,000	15,000
Office & Light Industrial Mix		1,296,000	1,296,000	0	1,296,000	1,296,000
Residential	31,000	31,000	914,000	883,000	31,000	1,581,000
<b>TOTAL:</b>	<b>1,904,000</b>	<b>2,888,000</b>	<b>4,246,000</b>	<b>2,211,000?</b>	<b>4,603,000</b>	<b>3,986,000</b>

The level of development proposed by Gateway Development does require a comprehensive plan amendment.

This comment is an observation to clarify what Gateway Development is proposing. We do not believe these tables need to be added to the Final AUAR.

**Response:** The City recognizes that the magnitude of Scenario 2 redevelopment outlined in Tables 6-2 and 6-3 in the AUAR represent the entire study area and not just the specific site redevelopment in the Pentagon Towers and Pentagon Quads site. The specifics of the Pentagon Towers and Quads site are summarized in the text in Item 6. No changes to the AUAR are needed.

**Comment 3: 6. Description, C. Anticipated Infrastructure Improvements, p. 20-21.** The Transportation paragraph fails to identify traffic mitigation measures that are already needed or will be needed based on already approved developments and expected increases in background traffic. Please see the more complete comment on this point in Paragraph 2.9.

**Response:** This section defines traffic mitigation measures needed to address redevelopment of the entire study area. Specific mitigation measures needed for a specific redevelopment project will be addressed through a separate process such as the redevelopment plan review process or through a request for this information outside of the AUAR process. The Final AUAR was revised to include an additional mitigation measure to address this issue.

**Comment 4: Project Magnitude Data, Project Magnitude Mitigation Plan, p. 22.** The text states that building heights may range “up to 14 stories for a proposed hotel.” The hotel proposed by Gateway Development is seven stories high, not 14 stories. Office buildings on the Pentagon Towers site may reach 14 stories. This information should be corrected in the Final AUAR.

**Response:** The reference to a proposed 14-story hotel has been removed from the Final AUAR and replaced with reference to a proposed 14-story office building.

**Comment 5: 7. Project Magnitude Data, Project Magnitude Mitigation Plan, p. 22-23.** This mitigation measure implies that variances are the only way to gain approval for project components that exceed Edina City Code requirements. A project proposer could also seek to amend Edina City Code, and this option should be added to the Final AUAR.

**Response:** The Final AUAR has been revised to indicate that a project proposer could also seek to amend the City Code.

**Comment 6: 8. Permits and Approvals, Table 8-1, p. 23-24.** Under the Geologic Hazards and Soil Conditions Mitigation Plan in the fourth bullet on p.63, the text suggests that permanent dewatering would need to be approved by the Nine Mile Creek Watershed District. This approval needs to be added to Table 8-1.

**Response:** This permit has been added to Table 8-1.

**Comment 7: 17. Water Quality – Surface Water Runoff, Water Quality – Surface Water Runoff Mitigation Plan, p. 44.** We do not understand the reference here in the third bullet to a reduction in runoff volume “so as not to negatively impact the existing storm sewer system.” We understand the need to reduce runoff volume to meet the City’s and the Nine Mile Creek Watershed District’s storm water standards. We cannot find any discussion in the Draft AUAR, however, about existing storm water volumes negatively impacting the storm sewers or any thresholds for volume reductions needed to eliminate this impact. This needs to be clarified in the Final AUAR.

**Response:** This mitigation item relates to the analysis on Page 41 about the capacity of the existing storm sewer system and **Figure 17-1**. There are several manholes that surcharge during a 10-year storm event. Therefore, the mitigation item addresses the need to prevent aggravation to the system by sending more water to the storm sewer that already surcharges during some storm events. No change to the Final AUAR is needed.

**Comment 8: 18. Water Quality – Wastewater, Impacts of Development Scenarios, p. 49.** The text in the first full paragraph on page 49 states that there are no other known developments occurring within Sanitary Sewer Districts A or B outside the Gateway Study Area that would impact Lift Station No. 10 or 6. No information or conclusion on this subject is offered for Sanitary Sewer District C. This missing information should be added to the Final AUAR.

**Response:** Sanitary Sewer District C does not extend beyond the Gateway Study Area. As such, no reference to potential development outside the Gateway Area was made for this District. This information has been added to the Final AUAR.

**Comment 9: 19. Geologic Hazards and Soil Conditions, Geologic Hazards and Soil Conditions Mitigation Plan, p. 63.** The first bullet indicates that a project's Storm Water Pollution Prevention Plan ("SWPPP") will be reviewed as part of the platting process. This review will occur as part of the City's general review process, the Nine Mile Creek Watershed District's permit review, and the Minnesota Pollution Control Agency's NPDES/SDS Construction Storm Water Permit review. We do not think the SWPPP will be subject to review during the platting process. This should be corrected in the Final AUAR.

**Response:** This statement was found on Page 39 in Item 16. The mitigation item has been revised to state that the SWPPP will need to be reviewed by Edina. Reference to when this review would occur has been removed.

**Comment 10: 21. Traffic, p. 65-109.** We have three main concerns related to the traffic analysis and traffic mitigation plan:

- The mitigation measures required as a result of existing conditions, background growth, and cumulative project impacts are not defined.
- The mitigation measures provide no means to determine when each measure is necessary or how it will be determined which landowner triggers which improvements.
- There is no indication whether the proposed mitigation measures can be constructed without major right-of-way or building impacts.

*Existing and Background Growth.* Even though the Draft AUAR is not required to evaluate a no build alternative, a complete traffic analysis should evaluate background traffic increases and the cumulative impacts of projects planned or under construction. Otherwise the City cannot separate the redevelopment scenario traffic impacts from background traffic impacts and cumulative project impacts. For example, the existing conditions described in the Draft AUAR indicate at least two intersections that currently operate at level of service ("LOS") E and three that operate at LOS D in the PM peak hour (Table 21-8). The freeway analysis also shows one merge/ramp junction that operates at LOS F and several more at LOS D in the PM peak hour (Table 21-9). Based on existing conditions, it is fully expected that background growth alone will result in additional intersection LOS impacts by year 2014 and 2030. But except for Table 21-21, which includes a 2014 No Build analysis, the Draft AUAR fails to provide this information.

The distinction between redevelopment traffic impacts versus background impacts and cumulative project impacts should be disclosed in the Final AUAR and Final Mitigation Plan. To do so, a no-build evaluation should be included in Tables 21-14 through 21-20 of the Draft AUAR.

**Response:** Each proposed redevelopment within the Gateway Area will be evaluated by the City prior to approval. The evaluation/study will determine which mitigation measures are necessary to adequately facilitate traffic generated within the specific proposed development, at what year the

mitigated improvements are needed, and quantify the portion of expense for the mitigation the specific development is responsible for. No changes to the Final AUAR are needed.

**Comment 11: *Mitigation Thresholds.*** The way the Roadway Improvements Mitigation Plan reads currently, the City's intent on when mitigation measures will be implemented is unclear. One could argue, the way the measures are currently written, that no measures are needed prior to 2014, and some not until 2030. Or it could be interpreted that no redevelopment can occur between now and 2014 until all the 2014 measures are in place, and none between 2014 and 2030 until all the 2030 measures are in place. We do not believe the City intended either of these interpretations, thus additional information is needed in the Final AUAR.

Since the LOS impact evaluation is based on the number of trips in the AM and PM peak hours, traffic improvements could be linked to trip thresholds. Thresholds should first reflect improvements triggered by background trip growth and cumulative project trip growth and then improvements triggered by redevelopment net trip increases. As to redevelopment, attention would also need to be paid to the location of the redevelopment. For example, redevelopment on the west end of the Study Area is less likely to create trip increases on France Avenue as compared to development on the east end of the Study Area. The net increase in trips would also take into account the reduction of trips as a result of existing users being replaced with new users. For example, removal of 500 trips and the addition of 300 should not result in triggering any mitigation measures. Adding trip thresholds for each mitigation measure in the Final AUAR would help developers and public officials to plan for redevelopment.

However, given the number of redevelopment levels and locations and the number of mitigation locations, this may not be feasible in the Final AUAR. If not, then a mitigation measure should be added that requires each project proposer to prepare a traffic study that analyzes the traffic impacts of its proposed redevelopment (or redevelopment phase) and identifies any traffic mitigation measures triggered by it.

**Response:** See response to Comment 10.

**Comment 12: *Mitigation Feasibility.*** The Roadway Improvement Mitigation Plan provides no indication whether each proposed mitigation measures is feasible or practical. For example, the reconstruction of the TH100/77<sup>th</sup> Street interchange for Scenario 3 would require MnDOT to reconstruct the existing bridge. This is not something the City or Study Area landowners could be required to do, since they have no jurisdiction over this interchange. As another example, can the additional thru lane proposed on France Avenue be added without removing existing buildings or acquisition of additional right of way? In the Final AUAR, the feasibility and responsibility for the traffic mitigation measures should receive additional analysis.

**Response:** The indicated traffic mitigation measures are required for the level of development proposed for each scenario. The financial obligation for a specific improvement may limit the practicality of the proposed development. Often times large scale improvements are not fully funded by a single development. It is common for a development to only be responsible for their portion of the improvement proportional to the traffic generated from the proposed site. No changes on the AUAR are needed.

**Comment 13: 24. Odors, Noise, and Dust, Noise Analysis, p. 99.** Noise receptor R3 is identified as being "in an existing residential development." What does "in" mean? Inside a building? Inside a courtyard? The Final AUAR should clarify this.

**Response:** The location of a noise receptor is chosen using the following MPCA location criteria:

- Measurements must be made at or within the applicable Noise Area Classification at the point of human activity nearest the noise source;
- Measurements must be made outdoors;
- Measurements must be made at least three feet off the ground and away from natural or manmade structures which would prevent an accurate measurement (barriers, houses).

No changes to the AUAR are needed.

**Comment 14: 24. Odors, Noise, and Dust, Noise Analysis, p. 99-100.** The text describes why the locations of noise receptors R1 through R4 were chosen but gives no reasons for choosing the locations of receptors R5 and R6. This information should be provided in the Final AUAR.

**Response:** The text should have included R5 and R6 with R4 as commercial locations. The Final AUAR has been changed.

**Comment 15: 24. Odors, Noise, and Dust, Noise Analysis and Tables 24-2 and 24-4, p. 100-101.** On page 100, it indicates that all residential noise receptors are shown in bold in Tables 24-2 and 24-3. But receptor R3, which is identified on page 99 as being in a residential development, is not represented in bold in either table. This should be corrected in the Final AUAR.

**Response:** This has been changed in the Final AUAR.

**Comment 16: 24. Odors, Noise, and Dust, Table 24-3, p. 101.** Receptors R3 and R6 are on opposite sides of West 77<sup>th</sup> Street, approximately the same distance from the roadway. Yet in Table 24-3 the noise levels differ between the receptors by 10+ decibels or double the noise level. This needs to be checked or explained before publication of the Final AUAR.

**Response:** The R3 receptor location is near the existing industrial Seagate building and closer to I-494, therefore having a louder decibel reading. No changes in the AUAR are needed.

**Comment 17: 24. Odors, Noise, and Dust, Odors, Noise, and Dust Mitigation Measures, p. 102.** The mitigation measure in the third bullet would be more helpful if it noted that the applicable noise abatement requirements to conform to state standards can be found in Minn. Rules 7030.0050, subp. 3. This should be added to the Final AUAR.

**Response:** This change has been made to the Final AUAR.

**Comment 18. 26. Visual Impacts, Visual Impacts Mitigation Plan, p. 103.** This mitigation measure implies that variances are the only way to gain approval for project components that exceed Edina City Code requirements. A project proposer could also seek to amend Edina City Code, and this option should be added to the Final AUAR. See also comment in Comment 5.

**Response:** See response to Comment No. 5

**Comment 19: [The following comments were also submitted with this letter. Responses relate back to previous comments]**

- **Land Use Compatibility and Permitting, A4, p. 8.** As to mitigation measure A4, see the Comments 5 and 16.

- **Geologic Hazards, Erosion control, and Hazardous Material, B4, p. 8.** As to mitigation measure B4, see Comment 9.
- **Water quality and Quantity Mitigation Plan, E3, p. 11.** As to mitigation measure E3, see Comment 7.
- **Traffic and Transportation, p. 12-13.** For comments on mitigation measures G-1 through G3, see Comment 10.
- **Odor, Noise, and Dust, H3, p. 13.** As to mitigation measure H3, see Comment 15.

**Response:** Responses are included with previous comments.

**Comment 20: Cumulative Impacts, p. 14.** As we read the Draft AUAR, there are several more places where Edina proposes to cooperate with other jurisdictions to address cumulative impact, for example, with Bloomington and the Nine Mile Creek Watershed District and with the Metropolitan Council on sanitary sewer capacity. All these efforts should be listed in the Final AUAR.

**Response:** The AUAR includes mitigation measures to coordinate with Bloomington, Metropolitan Council, and Nine Mile Creek Watershed District. These are listed in the Mitigation Plan as D1, D6, E8, F1, and F2. A reference to these other mitigation measures will be included with the Cumulative Impacts measures.

#### **Comments from Nine Mile Creek Watershed District**

**Comment 1:** As stated in the AUAR, permits will be needed from the Nine Mile Creek Watershed District (NMCWD) before any construction activities on the project can commence.

**Response:** No response is necessary. No changes to the AUAR are needed.

**Comment 2:** The AUAR mentions the need to address rate and volume control of storm water. The NMCWD is currently in a rule-making process that will require rate and volume control. The NMCWD would encourage the developer to follow the proposed new rules to help reduce storm water runoff rates and volumes.

**Response:** This comment will be shared with potential developers. No changes to the AUAR are needed.

**Comment 3:** As mentioned above, the NMCWD is currently developing new rules. These rules will include wetlands, storm water management, sediment and erosion control, and floodplains. The storm water management rule will require rate and volume control for all developments and redevelopments. The NMCWD is considering a volume control requirement that will require the retention on site of the first one (1) inch of runoff generated from all impervious surfaces from existing conditions for the 2-, 10-, and 100-year storm events. It is anticipated that the new rules will be adopted in early 2008.

**Response:** Any redevelopment in the area will be required to meet the current standards of the various permitting agencies. No changes to the AUAR are needed.

**Comment 4:** Water quality treatment of storm water will need to provide removal efficiencies of at least 60% for phosphorus and at least 80% for total suspended solids.

**Response:** This comment will be shared with potential developers. As areas redevelop, the City will encourage the use of Low Impact Design techniques and projects will be required to meet the

policies of the Watershed District. The MPCA's Storm Water Manual anticipates removal efficiencies for selected LID practices to be between 60% and 100% for Total Phosphorus and 80% to 95% for Total Suspended Solids. No changes to the AUAR are needed.

**Comment 5:** Maintenance of storm water management facilities will be critical to ensuring the long-term viability of such facilities. Maintenance plans that identify and protect the design, capacity, and functionality of storm water management structures should be developed.

**Response:** A mitigation measure stating that privately constructed and maintained storm water management facilities will require that a maintenance plan be reviewed and approved by the NMCWD has been added to the Final AUAR.

**Comment 6:** The NMCWD is pleased to see that Low Impact Development (LID) techniques are being encouraged by the City of Edina. The NMCWD also encourages the use of LID techniques to reduce impervious surface of developments and help reduce storm water runoff.

**Response:** No response is necessary. No changes to the AUAR are needed.

**Comment 7:** As the AUAR stated, Nine Mile Creek is listed on [the] State's impaired waters list for turbidity, biota, and chlorides. The NMCWD is working the Minnesota Pollution Control Agency to develop TMDL studies for these impairments. The NMCWD encourages the developer to identify practices that will reduce the runoff of sediments and chlorides from the project sites. This will help improve the water quality of Nine Mile Creek.

**Response:** This comment will be provided the potential developers. No changes to the AUAR are needed.

#### **Comments from Metropolitan Council**

**Comment 1:** The DAUAR doesn't mention bus service. In addition to being a significant mode of transportation, bus transit service is also a potential method of mitigating traffic congestion in the AUAR study area. The high-density development proposed in Scenarios 2, 3 and 4 would support increased transit use, especially if high-density housing is provided as proposed in Scenario 4. This is supported in the DAUAR document, (page 107), where it states, "As the general population of Edina continues to age, there will be an increasing need for senior housing, especially in mixed-use developments where acquisition of personal goods and services do not require driving." The final AUAR, (FAUAR) should address transit service.

Metro Transit's main concern regarding the DAUAR is for pedestrian safety and pedestrian access to transit facilities. Access to transit and pedestrian/transit facilities are generally deficient in the study area and, in addition, will be negatively affected in the development scenarios proposed in the DAUAR.

The City's "Draft Mitigation Plan" for the Gateway Study Area, found on the blue pages 8 through 14, addresses traffic and transportation mitigation in Section G. The measures described in the mitigation plan seem to accommodate automobiles to the exclusion of other modes, such as bicycle and pedestrian traffic. The measures described add additional through lanes on already wide, pedestrian-unfriendly roads such as France Ave. (at Minnesota Drive) and double left turn and double right turn lanes at most of the intersections. Neither sidewalks nor pedestrian access are mentioned. This is a real concern for transit service in the Gateway Study Area because bus riders are also pedestrians. Particular areas of concern for improved access and facilities include:

1. **Route 540/76<sup>th</sup> – 77<sup>th</sup> Street.** The key bus route in the Gateway Study area is Route 540 76<sup>th</sup>/77<sup>th</sup> Street. This route provides a cross-town service from the Edina industrial area west of Hwy. 100 to the Mall of America. Plans call for improved route frequency and the extension of the route to the Normandale Lakes Office Park in Bloomington.
2. **Route 6/France Avenue.** Metro Transit provides frequent service on France Ave. to/from Minneapolis to the Gateway Study Area via Route 6. Increased service is planned along France Avenue for this route and better pedestrian facilities are needed.
3. **France Ave., Minnesota Drive, Parklawn Ave. and W. 77<sup>th</sup> Street.** These streets have inadequate sidewalks in most areas. Sidewalks are discontinuous, most notably along France Ave. northbound and along W. 77<sup>th</sup> St. westbound. Where sidewalks exist, they are narrow, yet next to high volume roadways. Most bus stops are not currently ADA compliant.

**Response:** With each development proposal, the City requires a specific travel demand management (TDM) plan that addresses transit service as well as pedestrian accommodations. In addition, the City's Transportation Plan, currently being prepared, will address the transit issues and pedestrian issues in this area. A section has been added to the Final AUAR to discuss the existing transit service and outlines general mitigation measures.

**Comment 2:** These safety deficits should be addressed by the FAUAR. How and where will sidewalks, not just roads, be widened or provided in this study area? In addition to addressing safety concerns, the FAUAR also needs to describe improvements to non-motorized access both to and within the Gateway Study Area to create an up-to-date plan that recognizes the alternatives that exist to the single occupant automobile. There should be a section on this subject added to the FAUAR, complete with maps that, a) show existing bus stop locations and those stops requiring improvements to be ADA compliant, and b) document the sidewalk system and facilities as they now exist and how these systems should be enhanced. The City should also address pedestrian access to transit in its comprehensive plan update, (CPU).

**Response:** See response to Comment 1 above. In addition, a mitigation measure to address pedestrian use and sidewalk/trails has been added to the Final AUAR.

**Comment 3: Comprehensive Plan.** The City's 2008 CPU should incorporate policy and implementation measures to mitigate the effects of redevelopment in the Gateway Study Area. The DAUAR, page 104 indicates that implementing Scenarios 2, 3 and 4 would require the City's current comprehensive plan to be amended to allow for the proposed land uses and densities. The FAUAR should provide details on how such mitigation will be addressed in the City's 2008 CPU and/or in a comprehensive plan amendment (CPA).

**Response:** The City anticipates that a Comprehensive Plan Amendment will be submitted to address a specific development within the Gateway Study Area, ahead of the 2008 Comprehensive Plan Update that is underway. The City's 2008 Comprehensive Plan Update is anticipated to reflect any amendment that may occur. With a specific development plan, the mitigation measures outlined within the AUAR will need to be adhered to and this would be part of any CPA approvals. This process is outlined in Item 27 of the AUAR.

**Comment 4: Population and Household Forecasts.** Edina is estimated to have 21,100 households currently; the 2030 forecast is 22,500. Should the City decide to pursue development options 2 or 4, it will need to request the Council to revise (increase) Edina's household and population forecasts.

**Response:** If any of the development scenarios are pursued that would increase the City's households, the City of Edina would request the Met Council to revise its forecasts accordingly as part of an amendment to the Comprehensive Plan.

**Comment 5: Employment Forecasts** Development Scenarios 2 and 3 would allow for gross employment growth in Edina. The Metropolitan Council has forecasted Edina employment to grow from 53,000 in 2000 to 62,400 in 2030. So far this decade, Edina employment has declined substantially to a current estimate of 49,300. Even with development options 2 or 3, Edina is unlikely to reach its current 2030 Metropolitan System Statement employment forecast.

**Response:** Under any of the four development scenarios, Edina would concur that it will not likely reach the Metropolitan Council's employment forecast for 2030.

**Comment 6: Plan and Zoning Ordinance Compatibility.** State law considers a zoning ordinance to be an implementing measure for a comprehensive plan. Land uses allowed in a zoning district must also be allowed in the designated land use guiding applied to an area in the comprehensive plan. This must be taken into account as the City develops a CPA for the AUAR site and/or rezones properties in the AUAR study area.

**Response:** The City will take this into account during the CPA and rezoning process. No change to the AUAR is needed.

**Comment 7: Item 18: Water Quality – Wastewater**

It appears that the regional disposal system that provides service to the AUAR study area is currently operating near its full design capacity and has insufficient capacity to accommodate the additional flows generated by the AUAR development (all alternatives). The projected wastewater flow, as outlined under each of the four development Scenarios, would cause a system impact to the Metropolitan Disposal System. However, the information in the DAUAR is not of sufficient detail to determine the precise impact of the AUAR development scenarios to the regional disposal system. Therefore, Council staff has determined that the DAUAR report is incomplete to determine the full impact to the regional disposal system.

The FAUAR needs to contain more detailed information related to the specific Pentagon Towers and Pentagon Quad project (including staging, timing and additional flows). Once this information is available, a meeting between the Metropolitan Council staff and City of Edina staff will be necessary to discuss both short term and long term service options available for this area of the City.

**Response:** Edina Staff and Met Council Staff met to determine the Met Council's needs with respect to this comment. The Met Council needed additional specific information related to specific flows from the Gateway Study Area, but this information did not need to be included in the AUAR. A letter was sent to Met Council on August 21, 2007 with this information. A follow up phone call with Kyle Colvin at Met Council indicated that the information in the August 21 letter was sufficient to address their needs. A copy of the August 21 letter is attached. No changes to the AUAR are needed.

**Comment 8: Item 21, Traffic**

The DAUAR appears accurate and complete regarding the analysis of related road and intersection impacts. Mitigation strategies such as additional turn lanes and lane extensions will be needed at various intersections within the study area to accommodate traffic from the different scenarios. Scenario 3 will have the largest impact to I-494 and TH 100 although deficiencies in weave segments and ramp junctions were attributable to

increases in mainline volumes, rather than the increase in redevelopment traffic at the ramps. Expansion of I-494 between Highway 100 and TH 77 is included in the regional transportation plan as an expansion project needed by 2030. However, it is not included in Mn/DOT's 10 year work plan and no funds are identified for it at this time.

**Response:** The City is aware Mn/DOT has no plans or funding to improve I-494 in the 10-year Work Plan. No change to the AUAR is needed.

### **Comments from Tom Gastler**

**Comment 1:** I did not see any reference to how the possible development options would affect the storm drainage to the north. I know that some improvements were made after the 1987 mega storm but wonder if redevelopment of this area would negatively impact the storm drainage coming from 72nd down Parklawn Ave?

**Response:** Figure 17-1 of the AUAR shows the drainage boundaries surrounding the AUAR study area. The drainage divide is south of 72<sup>nd</sup> Street West, with runoff being conveyed to the south. Redevelopment in this area will need to limit peak runoff rates so as not to negatively impact the existing storm sewer system. Based on this, the storm sewer serving upstream areas, such as the area north of the AUAR study area, will not be impacted by the proposed redevelopment. No changes to the AUAR are needed.

**Comment 2:** I noticed that there might be some dewatering required; possibly permanent dewatering. How would this impact Lake Edina? Given that there is a possibility that Southdale's water based heating/cooling permit might not be renewed so that water flow might be stopped. If I understand the mechanics some of that water currently ends up in Lake Edina. Without this and with additional dewatering would the lake be negatively impacted?

**Response:** If permanent dewatering is required, the developers of each individual site will be required to prepare a dewatering plan that will minimize impacts to nearby water bodies. It is anticipated that these permanent dewatering systems will utilize a cut-off "slurry wall" or some type of foundation system that will limit the impacts of dewatering to a small, localized area. Modifications to Southdale Mall's heating and cooling system are beyond the scope of this AUAR. No changes to the AUAR are needed.

**Comment 3:** There was a very brief mention of the possible effects on police & fire in this report. Is this something that is covered in the actual development planning or should more detail be given in this report?

**Response:** The City is responsible for providing fire and police protection to residents and landowners in the City. The AUAR needs only to identify this item. No additional analysis and is needed in the AUAR. The City routinely reviews the needs of public safety in the community and adjusts as necessary.

### **Comments from Hennepin County Transportation Department**

**Comment 1:** *Existing and Future Roadway Operations for France Avenue.* We were somewhat surprised by the AUAR's portrayal of the existing operations of France Avenue as being "uncongested" today. We perceive that this is not the case, and believe that perhaps the erroneous conclusion was reached in part due to the methodology used for the planning level analysis discussed on page 66.

**Response:** Capacity assessment based on daily traffic volumes has been removed from the Final AUAR, including removing Table 21-1, Table 21-7, and modifications to Table 21-14. This 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.

**Comment 2:** Individual lane utilization is very unbalanced on France Avenue due to the high volume of turning vehicles. This unbalanced lane utilization leads to spillback that affects multiple intersections along the corridor. The Highway Capacity Manual methods for arterial roadways do not account for this type of phenomenon.

One good example of this type of occurrence is the southbound movement from France Avenue to I-494. The rightmost southbound lane experiences a very high utilization due to the fact that both the westbound ramp and eastbound loop to I-494 are on the right side. Drivers typically try to anticipate the upcoming turn a few blocks in advance, so the spillback on a typical p.m. peak hour often stretches from West 78<sup>th</sup> Street back almost to West 76<sup>th</sup> Street. Our studies have found that 55% of the southbound p.m. peak hour traffic is actually destined to these two ramps to I-494.

**Response:** 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:

- Closely spaced intersections with blocking problems
- Closely spaced intersections with lane change problems
- The effects of signals on nearby unsignalized intersections and driveways
- The operation of intersections under heavy congestion

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.

**Comment 3:** We have recently retimed our signals to improve the progression on France Avenue which has reduced these spillback queues somewhat, however, adding many hundreds of vehicles in the peak hour onto southbound France Avenue will likely have a significant impact.

**Response:** The revised signal timing was provided by Tim Mrozek in July, 2007 and incorporated into the traffic analysis. No changes to the AUAR are needed.

**Comment 4:** *Anticipated Traffic Growth.* The AUAR asserts that background growth was added to account for other area developments, however the report's volumes show only a very slight addition beyond the trips added by the proposed development scenarios. For example, the base 2005 ADT of 28,700 on France Avenue between West 76<sup>th</sup> Street to Minnesota Drive (Table 21-7) is only projected to grow to 29,600 ADT by 2030 for Scenarios 1 and 4 (Table 21-14). This is only about a 3% growth in 25 years for the proposed development including background growth.

The average Hennepin County roadway is growing about 2% per year (64% increase in 25 years). The recent Greater Southdale Area Study completed for Edina in 2005 projected a background traffic growth rate

of 0.5% per year (13% increase in 25 years). The Southdale Study also anticipated an overall 30% increase in area tripmaking over the next 20 years due to redevelopment and new mixed uses.

**Response:** Table 21-14 and associated text 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.

### **Comments from City of Bloomington**

**Comment 1: Wastewater.** Properties in Bloomington and in most of the Gateway Study Area of Edina rely upon MCES Interceptor BN-499 for wastewater service. Recent City of Bloomington flow monitoring shows that the MCES interceptor is near full capacity today in the vicinity of 84<sup>th</sup> Street and France Avenue. Given present conditions, no additional flow can be added in the portion of Bloomington and Edina upstream of 84<sup>th</sup> and France without danger of property damage from interceptor surcharges.

Edina, Bloomington, and WSB representatives have met with MCES officials to discuss the interceptor concerns. MCES is currently reviewing existing flows and development forecasts in order to make a decision on future improvements to the MCES interceptor near 84<sup>th</sup> and France. In addition to the long-term solution of replacing a segment of the interceptor with larger pipe, the Draft AUAR points out that a potential short-term partial solution involves adjusting the pumping cycles at MCES Lift Station #10 to reduce the peaking characteristics of flows downstream.

Bloomington looks forward to working with Edina and MCES on a regionally funded solution to the MCES interceptor capacity constraints that will allow development in the Gateway Study Area to proceed in a timely fashion. Ideally, these discussions will be far enough along to allow the Final AUAR to include:

- Information on the timing of potential MCES improvements and therefore the time constraints on the commencement of redevelopment within the Gateway Study Area and
- Information on the extent to which modifications to the pumping cycles at MCES Lift Station #10 could free capacity downstream in MCES Interceptor BN-499.

**Response:** Additional meetings with MCES, Bloomington, and Edina have occurred after the comment period. Edina will continue to work with the MCES and Bloomington to develop a solution to this issue. Additional information on specific known development in the AUAR area (the Pentagon Towers and Pentagon Quads site) has been submitted to the MCES. The specific solution to address the interceptor issue will be analyzed by MCES in the upcoming weeks. No changes have been made to the AUAR.

**Comment 2: Storm Water Management.** Bloomington anticipates additional discussions with Edina on the potential expansion of South Pond (also commonly referred to as the "Border Basin") to improve the management of storm water quality and quantity in the area. Thinking of long-term redevelopment in the area, Bloomington would like to see South Pond expanded in a manner that would maximize its ability to serve as an amenity.

Bloomington has considered enhancement of South Pond in the past, but has delayed submitting a petition to the Nine Mile Creek Watershed District due to an area landowner request that relates to soil stability. The Cities of Edina and Bloomington should work with Nine Mile Creek Watershed District to discuss storm water quantity and quality improvement alternatives that are sensitive to area conditions, including soils.

**Response:** Edina will continue to work with Bloomington and Nine Mile Creek Watershed District to construct improvements to this basin while taking into account the soils in the area.

**Comment 3: Transportation.** One traffic mitigation strategy not mentioned in the Draft AUAR is the addition of westbound I-494 access at East Bush Lake Road. Bloomington has been working on this strategy with the Federal Highway Administration and Mn/DOT for several years. The addition of westbound I-494 access at East Bush Lake Road would benefit the Gateway Study Area and merits special mention in the Final AUAR and inclusion in the mitigation plan. Bloomington looks forward to working cooperatively with Edina to encourage construction of westbound I-494 access at East Bush Lake Road.

**Response:** It is noted that the additional access to westbound I-494 from East Bush Lake Road would benefit the redevelopment of the Gateway Area. The City of Edina, together with the City of Bloomington, has agreed to study this area in more detail. No changes to the AUAR are needed.

**Comment 4: Transportation.** Another mitigation strategy not mentioned in the Draft AUAR that merits consideration for the Final AUAR is the creation of a continuous east-west parallel arterial north of I-494 from France Avenue to East Bush Lake Road. This strategy would involve realigning 76<sup>th</sup> Street, 77<sup>th</sup> Street, and Edina Industrial Boulevard to serve as one continuous parallel arterial, similar to American Boulevard on the south side of I-494. This improvement would facilitate improved traffic flow while encouraging additional redevelopment in the area.

**Response:** Changes have been made to Section 21.D Roadway Improvements Mitigation Plan. The Final AUAR includes discussing the need for further study of site circulation and the development of a continuous east-west parallel arterial north of I-494 through Edina. The Final AUAR has been revised.

**Comment 5: Transportation.** Figure 21-4 and the text on Page 82 indicate that the same trip distribution assumptions were used for each of the four development scenarios. Bloomington requests that Edina reexamine this assumption in the Final AUAR given that varying land use scenarios (residential vs. non-residential uses for example) typically result in varying trip distribution, especially in regards to inbound vs. outbound trips during the AM and PM peak periods. From a Bloomington perspective, the assumed trip distribution to/from the east on I-494 and to/from the south on Normandale Boulevard seems low for all four scenarios. The trip distribution assumption from the west on I-494 and W. 78<sup>th</sup> Street seems high in the PM period.

**Response:** Different trip distributions for each land use scenario proposed were reviewed. It was determined that the different scenarios would have very similar distributions. Each land use scenario contains office land use and adds different mixes of retail and residential to create the new scenario. The anchor land use for the site is the office and office/warehouse use and is the primary peak hour trip generator, generating at least 75% of the trips for each alternative, therefore controlling the distribution. No changes to the AUAR are needed.

**Comment 6: Transportation.** Prior to preparation of the Final AUAR, Bloomington requests that Edina and Bloomington staff meet to discuss several details related to the traffic impact analysis, especially the forecast traffic conditions on East Bush Lake Road in Bloomington. For example, the Draft AUAR states that the 2030 level of service for the American Boulevard and East Bush Lake Road intersection will be LOS F + 100 in the AM peak and LOS A in the PM peak. A recent traffic study prepared for Bloomington by SRF (with higher Bloomington development assumptions) looked at the same intersection in 2030 and forecast a LOS B in the AM peak and a LOS B in the PM peak. Similar differences in forecast levels of service exist for the East Bush Lake Road intersections with the I-494 North Ramp, I-494 South Ramp and

78<sup>th</sup> Street. Given the large discrepancy between the Draft AUAR and a similar analysis done by SRF, Bloomington is concerned there may be a technical error in the Draft AUAR. If there is not a technical error, then Bloomington needs to better understand the impact of Scenario 2 on East Bush Lake Road in Bloomington. In either case, it would be beneficial for traffic engineering staff from Bloomington and Edina to meet. Prior to the meeting, Bloomington requests a complete copy of the traffic study given that the turn movement figures do not depict the East Bush Lake Road and American Boulevard intersection and do not depict 2030 turn movements.

**Response:** It is noted that American Boulevard at East Bush Lake Road, and the I-494 ramps at East Bush Lake Road will not operate well in the future with the existing signal timing. The mitigation strategy as stated in section 21.D Roadway Improvements Mitigation Plan, states "Intersection signal timing was first modified to provide optimal operations in each scenario." The above mentioned intersections operate at a LOS of C or better for all alternatives in the a.m. and p.m. peak hours. No changes to the AUAR are needed.

**Comment 7: Transportation.** Table 21-3 states that East Bush Lake Road from American Boulevard to W. 78<sup>th</sup> Street is "Two-lane with turn lanes." It should read "four-lane with turn lanes."

**Response:** Table 21-3 updated to reflect East Bush Lake Road is a four-lane divided roadway. The Final AUAR has been revised.

**Comment 8: Transportation.** Table 21-14 appears to conflict with Tables 21-17 and 21-18, with respect to ratings of congestions levels. For example, Table 21-14 classifies East Bush Lake Road from American Boulevard to W. 78<sup>th</sup> Street as "uncongested" in 2030, while Table 21-17 states that in 2030 all four modeled intersection in this stretch of East Bush Lake Road will operate at LOS F during the AM peak period under Scenario 2.

**Response:** Capacity assessment based on daily traffic volumes has been removed from the Final AUAR, including removing Table 21-1, Table 21-7, and modifications 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 patters near a high volume interchange (I-494). Capacity assessment will be limited to peak hour traffic modeling. The Final AUAR has been revised.

**Comment 9: Cumulative Impacts.** On Page 108 and in Figure 29-1, the Draft AUAR depicts "Current Adjacent Redevelopment Proposals." The text states that only Bloomington developments that are "approved and certain" are included. In regards to Figure 29-1 and Table 29-1, please note:

- Bloomington approved final development plans in April 2007 for a 285,000 square foot office building at 8200 Norman Center Drive. The project is commonly referred to as the "8200 Tower." The developer is United Properties.
- The shading for Area #2 south of American Boulevard should be removed. The Duke Realty project is north of American Boulevard.
- Bloomington has received an application (not yet approved) from the Richdale Group to develop 418 apartment units at 5100 W. 82<sup>nd</sup> Street. An EAW for the project will be released soon.
- There are several other Bloomington projects within the area depicted in Figure 29-1 that have received Bloomington zoning approval over the past 10 to 20 years but that may not be characterized as "certain" given the time elapsed since approval.

**Response:** The “8200 Tower” project has been shown on **Figure 29-1** and listed in **Table 29-1**. The correction to Area #2 has been on **Figure 29-1**. Regarding the future Bloomington EAW for the apartment buildings, Bloomington’s EAW should take into account the background traffic and future expansion in the Edina areas as part of that analysis. Since the apartments are not approved, they have not been included in the AUAR. The analysis in the AUAR represents reasonable assumptions as to cumulative impacts based on currently available information. No other changes have been made to the AUAR.

**Comment 10: Notification.** The City of Bloomington requests to be notified upon the receipt of applications for development projects within the Gateway AUAR area.

**Response:** Edina will continue to keep Bloomington informed of applications received in the study area. Edina would also like to be notified on any applications that Bloomington receives for development along the borders in Bloomington.

#### Comments from Rick Beaver

**Comment 1:** This email is in response to the Gateway AUAR. My name is Rick Beaver and I work at the Seagate site at 4801 West 50th Street. I've been assigned the duty follow this issue and see how, if any, impacts it will have on Seagate. Can you please copy me on any minutes from the July 24 public review meeting.

**Response:** Information from the public meeting was emailed under separate cover soon after receiving this email.

#### Comments from Nels Nelson

**Comment 1:** My interest in the Gateway project is mainly personal and based on walking through the area numerous times on my way to work. I do not comment as a representative of Barr Engineering Co. I would like to make two observations on the AUAR:

- The figures do not appear to be posted on your website. Without the figures, the AUAR as posted is difficult to follow.
- The AUAR does not discuss the history of the site. The response to Question 25 seems to overlook the question of whether the Pentagon Park office development had any significance in the history or development of the City of Edina. Perhaps, in addition to the State Historical Society the preparers ought to have consulted with the Edina Historical Society. My personal observation is that the buildings have an unusual appearance and internal layout and are not at all like the current crop of office buildings.

According to the April 27, 2007, Business Journal, Pentagon Park was one of the first corporate campuses in Minnesota and was among the first developments by the Rauenhorst Corp., predecessor to Opus Corp. The people who originally planned, built and worked in it are probably passing away. Therefore I suggest that since the structures are both intact and significant, their demolition will be an environmental impact that should at least be considered in the AUAR and subsequent issuance of permits for demolition. As a mitigation suggestion, would it be possible, at a minimum, to provide documentation of the structures and possibly the oral history of the project so that 100 years from now this part of our history will at least be knowable, if not intact.

**Response:** The figures were subsequently posted on the City's website after receiving this comment.

Additional information from the City's preservation planning consultant has been obtained. This information has been added to the Final AUAR along with a mitigation measure that documentation of the Pentagon Towers and Quads site will be needed before they are razed.

**Comments from Bette Anderson**

**Comment 1:** I have received notice of the upcoming meeting on July 24 regarding the AUAR Report to review the results of the environmental review process for the Gateway Area. My backyard property at 4936 Poppy Lane is adjacent to and directly behind the entry ramp onto Hwy. 100 North from 77<sup>th</sup> Street.

The homeowners whose property borders the entry ramp onto Hwy. 100 from 77<sup>th</sup> Street have already pled their case in the past regarding the noise and exhaust pollution due to our proximity to the highway. Especially during peak traffic times, conversations cannot be heard while sitting on the deck of my home due to the noise, nor can the stench of exhaust fumes be tolerated while outside in the backyard. We petitioned for a noise barrier of some sort but were told they would only build one 8 feet tall and that we would have to pay for it. This blatant disregard for the health and well-being of Edina's citizens was considered to be an abomination at that time. Should the Gateway development be allowed to go forward, I fear that the noise and pollution will only become more unbearable and will severely depreciate the value of our existing properties. The increase in traffic over the years has only lessened the appeal for potential buyers of our properties, and any additional adverse effects will only serve to further diminish the value.

Should there be changes slated to the intersection at 100 and 77<sup>th</sup> in an effort to widen and expand it, I would demand that concrete noise barriers be erected along the entrance ramp onto 100 N from 77<sup>th</sup> Street, similar to the noise barrier at Hwy 100 N and W. 70<sup>th</sup> Street. The irony is that there aren't even homes directly behind that noise barrier which has been there for many years now, but those living with the on-ramp literally in their backyards haven't been able to realize an effective wall against the traffic noise and exhaust pollution.

**Response:** The City will take this alternative into consideration if any reconstruction of the TH 100 / W 70<sup>th</sup> Street interchange is proposed. No changes to the AUAR are needed.

**Comment 2:** There is also the question of their obtaining easements to access some of our backyard property to expand the on-ramp to 100 N from 77<sup>th</sup> Street. I as well as my neighbors would appreciate being informed of any potential of this occurring.

**Response:** If any additional right-of-way or easements are needed, the City will work with the property owners and inform them in advance of any possible land needs. No changes to the AUAR are needed.

**Comment 3:** In addition, currently the storm sewer drainage hole located between my property and that of my neighbor's to the south of me routinely overflows when we have heavy rains such that a large amount of debris of all sorts is left on our yards when the water subsides. This would only worsen if this development goes forward and something would have to be done to remedy the situation.

**Response:** The storm sewer system in question is not directly connected to the storm sewer system in the Gateway AUAR study area. Runoff from the redevelopment within the study area is conveyed away from Poppy Lane, so it will not directly impact this property. No changes to the AUAR are needed.

**Comments from Neil Peterson**

**Comment 1:** I am Neil Peterson, and I am part of the ownership of a building at 4455 W 77th. I did testify at the hearing and am submitting a follow up E mail because of the storm last night (Monday 8/13) that supports my concern and frustration.

I am convinced that the development you are proposing will exacerbate the 1) flooding and 2) ground sinking that we and several neighbors are suffering.

1) Flooding: Last evening our back lot was completely under water, draining across 77th and areas north. As the limited capacity in the swamp filled we became the storage area. I observed that our neighbor, especially the Hotel directly to the south share the same flooding and sinking problem. We are apparently the properties negatively impacted the most.

2) Sinking: The parking and lawn perimeter area of our building has sunk over 2 feet in the last few years. This year has been the worst. We once again have had to raise the driveways to even access the building, which may not be possible the next time because of the incline. Our tenant is becoming increasingly irritated, as are we, especially as we see the development activity on the Bloomington side, and now this site, which will drain toward us too.

I understand that the water issue is that of the Water Shed District. I also know, the City of Bloomington and/or the District is permitting a surcharging of the vacant properties north of the pond area along the freeway. That "dewatering" I believe, contributes to our problem to the point that I am seeking professional engineering advice.

Your plans to develop north of our site and utilize this same swamp as part of the drainage, is really going to float us away.

**Response:** The storm pond in question is identified as SP\_1 or the "Border Basin." The City of Edina will be working with the City of Bloomington to petition Nine Mile Creek Watershed District to improve this pond. As plans for these improvements are developed, it is anticipated that the impacts on potential subsidence on surrounding properties will be investigated. Additionally, as individual properties develop, property owners will be required to develop a storm water management plan that will result in no increase in runoff rates. No changes to the AUAR are needed.

This concludes the responses to comments to the draft AUAR. The Final AUAR has been revised as summarized in this memo. If you have questions, please call me at (763)287-7196.



## Minnesota Department of Natural Resources

500 Lafayette Road  
St. Paul, Minnesota 55155-4025

August 20, 2007

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

### RE: EDINA GATEWAY STUDY AREA DRAFT AUAR

Dear Mr. Teague:

The Department of Natural Resources (DNR) has reviewed the Draft Alternative Urban Areawide Review (AUAR) for the EDINA GATEWAY STUDY AREA. We offer the following comments for your consideration.

The Draft AUAR generally is complete and accurate. The proposal is for redevelopment of a highly developed urban area. There is little habitat on-site and the surrounding area is also developed. There appears to be little or no opportunity for restoring a portion of the site to native habitat. Nine Mile Creek, located west of the Gateway site is the main natural resource element of concern. The earlier development of Edina, Bloomington and the highway system essentially was accomplished without consideration for impacts to the creek, ultimately damaging its structure and impairing water quality. The AUAR addresses water quality and quantity. We encourage efforts to manage stormwater on site to reduce strain on the creek.

#### Item No. 17. Water quality – Surface Water Runoff (pp. 40-44)

This item indicates that the existing storm water ponding is insufficient and that the receiving water, Nine Mile Creek, is impaired for turbidity, chloride and biota. This item suggests the use of low impact techniques to reduce impervious surfaces. Along that line, we might recommend that the developer utilize pervious pavement and pavers for parking lots and walkways and design buildings with systems to capture and store precipitation for use in lawn watering, flush toilets, etc. This would help address both the storage and stream impairment problems.

Mr. Teague  
August 20, 2007  
Page 2

We appreciate the opportunity to provide comments on the AUAR and thank you for your consideration. Please feel free to contact me with any questions or comments.

Sincerely,



Ronald Wieland, Senior Planner, (651) 259-5157  
Environmental Review and Planning Unit  
Division of Ecological Resources

cc: Bonita Eliason, Ecological Resources Regional Manager  
Wayne Barstad, DNR Ecological Resources Regional Ecologist  
Steve Colvin, DNR Environmental Review Supervisor  
Matthew Langan, DNR Principal Planner  
Lisa Joyal, DNR Endangered Species Environmental Review Coordinator

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Minnesota Department of Transportation

Metropolitan District

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

AUG 17 2007

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 Planner

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

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**BY E-MAIL**  
**AND MESSENGER**

August 15, 2007

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

COMMERCIAL REAL ESTATE ADVISORY



**RE: Comments On The Gateway Study Area Draft Alternative Urban Areawide Review**

Dear Mr. Teague:

We represent Gateway Development Edina LLC, ("Gateway Development") the company identified in the *Gateway Study Area Draft Alternative Urban Areawide Review* (the "Draft AUAR") as the "Developer." Gateway Development owns the parcels referred to in the Draft AUAR as the "Pentagon Towers site" and the "Pentagon Quads site." We have reviewed the Draft AUAR and the *Draft Mitigation Plan For Gateway Study Area* ("Draft Mitigation Plan") and have a limited number of comments on these documents that are presented in this letter.

**1. GENERAL COMMENTS**

The Draft AUAR represents a solid effort to address the potential environmental consequences of the redevelopment levels in the Gateway Study Area. With the addition of certain information more fully described below and other changes, the *Gateway Study Area Final Alternative Urban Areawide Review* ("Final AUAR") and the *Final Mitigation Plan For Gateway Study Area* ("Final Mitigation Plan") should accurately and completely portray these consequences.

**2. SPECIFIC COMMENTS ON THE DRAFT AUAR**

**2.1 6. Description, B. Description of Redevelopment Scenarios, Tables 6-2 and 6-3.** Gateway Development's proposal for development on the Pentagon Towers and Pentagon Quads sites results in significantly less development than Scenario 2. We have reproduced below Tables 6-2 and 6-3 and added lines labeled "2D" that show the density of Gateway Development's proposal to indicate this difference.

**Table 6-2. Summary of Redevelopment Scenarios\***

Scenario	Office Space			Office Space, Warehousing, & Light Industrial		Retail & Commercial (Mixed Use)		Housing & Residential (Mixed Use)		Hotel	
	Total Acres Developed	Acres	Gross Square Feet (in millions)	Acres	Gross Square Feet (in millions)	Acres	Gross Square Feet (in millions)	Units	Gross Square Feet (in millions)	Rooms	Gross Square Feet (in millions)
1	122.68	70.95	1,546	49.59	1,296	2.14	0.015	36	-	-	-
2	122.68	31.84	1,862	49.59	1,296	41.25 <sup>a</sup>	0.094	856	0.914	150	0.080
2D	39.1	11.08	1,168	0	0	1.8	.080	820	.883	150	.080
3	122.68	70.95	3,261	49.59	1,296	2.14	0.015	36	-	-	-
4	122.68	31.84	1,094	49.59	1,296	41.25 <sup>b</sup>	0.015	1,536	1.581	-	-

\* Calculations do not take into account existing or proposed wetlands, storm ponds, roads, right-of-way, or utility easements in the Gateway Study Area.

<sup>a</sup> Acreage includes mixed use development with commercial, retail, and office space applications.

<sup>b</sup> Acreage includes mixed use development with office space applications.

**Table 6-3: Comparison of Redevelopment Scenarios with Existing Conditions**

	Existing Conditions	Scenario 1: Comp. Plan	Scenario 2: Master Plan	Scenario 2D: Developer's Plan	Scenario 3: Maximum Commercial	Scenario 4: Maximum Residential
Office	1,873,000	1,546,000	1,862,000	1,168,000?	3,261,000	1,094,000
Commercial / Retail/Hotel		15,000	174,000	160,000	15,000	15,000
Office & Light Industrial Mix		1,296,000	1,296,000	0	1,296,000	1,296,000
Residential	31,000	31,000	914,000	883,000	31,000	1,581,000
<b>TOTAL:</b>	<b>1,904,000</b>	<b>2,888,000</b>	<b>4,246,000</b>	<b>2,211,000?</b>	<b>4,603,000</b>	<b>3,986,000</b>

The level of development proposed by Gateway Development does require a comprehensive plan amendment.

This comment is an observation to clarify what Gateway Development is proposing. We do not believe these tables need to be added to the Final AUAR.

2.2 6. Description, C. Anticipated Infrastructure Improvements, p. 20-21. The Transportation paragraph fails to identify traffic mitigation measures that are already needed or will be needed based on already approved developments and

expected increases in background traffic. Please see the more complete comment on this point in Paragraph 2.9.

- 2.3 Project Magnitude Data, Project Magnitude Mitigation Plan, p. 22.** The text states that building heights may range “up to 14 stories for a proposed hotel.” The hotel proposed by Gateway Development is seven stories high, not 14 stories. Office buildings on the Pentagon Towers site may reach 14 stories. This information should be corrected in the Final AUAR.
- 2.4 7. Project Magnitude Data, Project Magnitude Mitigation Plan, p. 22-23.** This mitigation measure implies that variances are the only way to gain approval for project components that exceed Edina City Code requirements. A project proposer could also seek to amend Edina City Code, and this option should be added to the Final AUAR.
- 2.5 8. Permits And Approvals, Table 8-1, p. 23-24.** Under the Geologic Hazards and Soil Conditions Mitigation Plan in the fourth bullet on p. 63, the text suggests that permanent dewatering would need to be approved by the Nine Mile Creek Watershed District. This approval needs to be added to Table 8-1.
- 2.6 17. Water Quality – Surface Water Runoff, Water Quality – Surface Water Runoff Mitigation Plan, p. 44.** We do not understand the reference here in the third bullet to a reduction in runoff volume “so as not to negatively impact the existing storm sewer system.” We understand the need to reduce runoff volume to meet the City’s and the Nine Mile Creek Watershed District’s storm water standards. We cannot find any discussion in the Draft AUAR, however, about existing storm water volumes negatively impacting the storm sewers or any thresholds for volume reductions needed to eliminate this impact. This needs to be clarified in the Final AUAR
- 2.7 18. Water Quality – Wastewater, Impacts of Development Scenarios, p. 49.** The text in the first full paragraph on page 49 states that there are no other known developments occurring within Sanitary Sewer Districts A or B but outside the Gateway Study Area that would impact Lift Station No. 10 or 6. No information or conclusion on this subject is offered for Sanitary Sewer District C. This missing information should be added to the Final AUAR.
- 2.8 19. Geologic Hazards and Soil Conditions, Geologic Hazards and Soil Conditions Mitigation Plan, p. 63.** The first bullet indicates that a project’s Storm Water Pollution Prevention Plan (“SWPPP”) will be reviewed as part of the platting process. This review will occur as part of the City’s general review process, the Nine Mile Creek Watershed District’s permit review, and the Minnesota Pollution Control Agency’s NPDES/SDS Construction Storm Water

Permit review. We do not think the SWPPP will be subject to review during the platting process. This should be corrected in the Final AUAR.

**2.9 21. Traffic, p. 65-109.** We have three main concerns related to the traffic analysis and traffic mitigation plan:

- The mitigation measures required as a result of existing conditions, background growth, and cumulative project impacts are not defined.
- The mitigation measures provide no means to determine when each measure is necessary or how it will be determined which landowner triggers which improvements.
- There is no indication whether the proposed mitigation measures can be constructed without major right of way or building impacts.

*A. Existing And Background Growth.* Even though the Draft AUAR is not required to evaluate a no build alternative, a complete traffic analysis should evaluate background traffic increases and the cumulative impacts of projects planned or under construction. Otherwise the City cannot separate the redevelopment scenario traffic impacts from background traffic impacts and cumulative project impacts. For example, the existing conditions described in the Draft AUAR indicate at least two intersections that currently operate at level of service ("LOS") E and three that operate at LOS D in the PM peak hour (Table 21-8). The freeway analysis also shows one merge/ramp junction that operates at LOS F and several more at LOS D in the PM peak hour (Table 21-9). Based on existing conditions, it is fully expected that background growth alone will result in additional intersection LOS impacts by year 2014 and 2030. But except for Table 21-21, which includes a 2014 No Build analysis, the Draft AUAR fails to provide this information.

The distinction between redevelopment traffic impacts versus background impacts and cumulative project impacts should be disclosed in the Final AUAR and Final Mitigation Plan. To do so, a no-build evaluation should be included in Tables 21-14 through 21-20 of the Draft AUAR.

*B. Mitigation Thresholds.* The way the Roadway Improvements Mitigation Plan reads currently, the City's intent on when mitigation measures will be implemented is unclear. One could argue, the way the measures are currently written, that no measures are needed prior to 2014, and some not until 2030. Or it could be interpreted that no redevelopment can occur between now and 2014 until all the 2014 measures are in place, and none between 2014 and 2030 until all the 2030 measures are in place. We do not believe the City intended either of these interpretations, thus additional information is needed in the Final AUAR.

Since the LOS impact evaluation is based on the number of trips in the AM and PM peak hours, traffic improvements could be linked to trip thresholds. Thresholds should first reflect improvements triggered by background trip growth and cumulative project trip growth and then improvements triggered by redevelopment net trip increases. As to redevelopment, attention would also need to be paid to the location of the redevelopment. For example, redevelopment on the west end of the Study Area is less likely to create trip increases on France Avenue as compared to development on the east end of the Study Area. The net increase in trips would also take into account the reduction of trips as a result of existing users being replaced with new users. For example, removal of 500 trips and the addition of 300 should not result in triggering any mitigation measures. Adding trip thresholds for each mitigation measure in the Final AUAR would help developers and public officials to plan for redevelopment.

However, given the number of redevelopment levels and locations and the number of mitigation locations, this may not be feasible in the Final AUAR. If not, then a mitigation measure should be added that requires each project proposer to prepare a traffic study that analyzes the traffic impacts of its proposed redevelopment (or redevelopment phase) and identifies any traffic mitigation measures triggered by it.

**C. Mitigation Feasibility.** The Roadway Improvement Mitigation Plan provides no indication whether each proposed mitigation measures is feasible or practical. For example, the reconstruction of the TH100/77<sup>th</sup> Street interchange for Scenario 3 would require MnDOT to reconstruct the existing bridge. This is not something the City or Study Area landowners could be required to do, since they have no jurisdiction over this interchange. As another example, can the additional thru lane proposed on France Avenue be added without removing existing buildings or acquisition of additional right of way? In the Final AUAR, the feasibility and responsibility for the traffic mitigation measures should receive additional analysis.

- 2.10 24. Odors, Noise, and Dust, Noise Analysis, p. 99.** Noise receptor R3 is identified as being "in an existing residential development." What does "in" mean? Inside a building? Inside a courtyard? The Final AUAR should clarify this.
- 2.11 24. Odors, Noise, and Dust, Noise Analysis, p. 99-100.** The text describes why the locations of noise receptors R1 through R4 were chosen but gives no reasons for choosing the locations of receptors R5 and R6. This information should be provided in the Final AUAR.

- 2.12 **24. Odors, Noise, and Dust, Noise Analysis and Tables 24-2 and 24-4, p. 100-101.** On page 100, it indicates that all residential noise receptors are shown in bold in Tables 24-2 and 24-3. But receptor R3, which is identified on page 99 as being in a residential development, is not represented in bold in either table. This should be corrected in the Final AUAR.
- 2.13 **24. Odors, Noise, and Dust, Table 24-3, p. 101.** Receptors R3 and R6 are on opposite sides of West 77<sup>th</sup> Street, approximately the same distance from the roadway. Yet in Table 24-3 the noise levels differ between the receptors by 10+ decibels or double the noise level. This needs to be checked or explained before publication of the Final AUAR
- 2.14 **24. Odors, Noise, and Dust, Odors, Noise, and Dust Mitigation Measures, p. 102.** The mitigation measure in the third bullet would be more helpful if it noted that the applicable noise abatement requirements to conform to state standards can be found in Minn. Rules 7030.0050, subp. 3. This should be added to the Final AUAR.
- 2.15 **26. Visual Impacts, Visual Impacts Mitigation Plan, p. 103.** This mitigation measure implies that variances are the only way to gain approval for project components that exceed Edina City Code requirements. A project proposer could also seek to amend Edina City Code, and this option should be added to the Final AUAR. See also comment in Paragraph 2.4.

### 3. SPECIFIC COMMENTS ON DRAFT MITIGATION PLAN

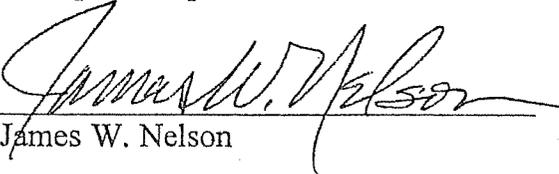
- 3.1 **A. Land Use Compatibility and Permitting, A4, p. 8.** As to mitigation measure A4, see the comment in Paragraphs 2.4 and 2.15.
- 3.2 **B. Geologic Hazards, Erosion Control, and Hazardous Material, B4, p. 8.** As to mitigation measure B4, see the comment in Paragraph 2.8.
- 3.3 **E. Water Quality and Quantity Mitigation Plan, E3, p. 11.** As to mitigation measure E3, see the comment in Paragraph 2.6.
- 3.4 **G. Traffic and Transportation, p. 12-13.** For comments on mitigation measures G-1 through G-3, see Paragraph 2.9.
- 3.5 **H. Odor, Noise, and Dust, H3, p. 13.** As to mitigation measure H3, see the comment in Paragraph 2.14.

- 3.6 I. Cumulative Impacts, p. 14.** As we read the Draft AUAR, there are several more places where Edina proposes to cooperate with other jurisdictions to address cumulative impact, for example, with Bloomington and the Nine Mile Creek Watershed District and with the Metropolitan Council on sanitary sewer capacity. All these efforts should be listed in the Final AUAR.

We appreciate the opportunity to comment on the Draft AUAR. If you have questions about our comments, please call me.

Sincerely,

EBERHARDT ADVISORY, LLC  
as Developer's Representative

By:   
James W. Nelson

JWN:WHR:EK:fb.us.2221921.01

cc: M. G. Kaminski  
Daniel J. Green  
Elizabeth Kunkel  
Walter H. Rockenstein II

# 9 Mile Creek

W A T E R S H E D D I S T R I C T

District Office: Edina Business Center • 7710 Computer Avenue • Suite 135 • Edina, MN 55435  
Ph. 952-835-2078 Fax 952-835-2079 Web Site: [www.ninemilecreek.org](http://www.ninemilecreek.org)

August 15, 2007

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

Dear Mr. Teague:

On behalf of the Nine Mile Creek Watershed District Board of Managers, I would like to thank you for the opportunity to review and comment on the Draft AUAR for the Gateway Study Area. I offer the following comments for your consideration.

1. As is stated in the AUAR, permits will be needed from the Nine Mile Creek Watershed District (NMCWD) before any construction activities on the Gateway project can commence.
2. The AUAR mentions the need to address rate and volume control of stormwater. The NMCWD is currently in a rule-making process that will require rate and volume control. The NMCWD would encourage the developer to follow the proposed new rules to help reduce stormwater runoff rates and volumes.
3. As mentioned above, the NMCWD is currently developing new rules. These rules will include wetlands, stormwater management, sediment & erosion control, and floodplains. The stormwater management rule will require rate and volume control for all developments and redevelopments. The NMCWD is considering a volume control requirement that will require the retention on site of the first one (1) inch of runoff generated from all impervious surfaces on the site. Developments will be required to limit peak runoff rates to that from existing conditions for the 2-, 10-, and 100-year storm events. It is anticipated that the new rules will be adopted in early 2008.
4. Water quality treatment of stormwater will need to provide removal efficiencies of at least 60% for phosphorus and at least 80% for total suspended solids.
5. Maintenance of stormwater management facilities will be critical to ensuring the long-term viability of such facilities. Maintenance plans that identify and protect the design, capacity, and functionality of stormwater management structures should be developed.

Board of Managers

LuAnn Tolliver - Minnetonka

Corrine Lynch - Eden Prairie

Bob Kojotin - Edina

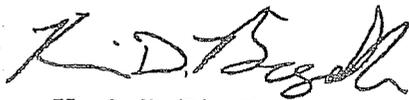
Floyd Laumann - Bloomington

Geoffrey Nash - Edina

6. The NMCWD is pleased to see that Low Impact Development (LID) techniques are being encouraged by the City of Edina. The NMCWD also encourages the use of LID techniques to reduce impervious surface of developments and help reduce stormwater runoff.
7. As the AUAR stated, Nine Mile Creek is listed on that State's impaired waters list for turbidity, biota, and chlorides. The NMCWD is working the Minnesota Pollution Control Agency to develop TMDL studies for these impairments. The NMCWD encourages the developer to identify practices that will reduce the runoff of sediments and chlorides from the project sites. This will help improve the water quality of Nine Mile Creek.

The Nine Mile Creek Watershed District thanks you for the opportunity to review and comments on the Gateway AUAR. On behalf of the Nine Mile Creek Watershed District Board of Managers, I look forward to working with the City of Edina and Gateway Development, Edina LLC on this development. If you have any questions, please contact me at (952) 835-2078.

Sincerely,



Kevin D. Bigalke  
District Administrator

August 14, 2007

Mr. Cary Teague  
Planning Director  
City of Edina  
4801 W. 50th Street  
Edina, MN 55424-1330

**RE: City of Edina, Gateway Study Area, Draft Alternative Urban Area-wide Review**  
Metropolitan Council District 5  
Metropolitan Council Review No. 20052-1

Dear Mr. Teague:

Metropolitan Council staff has completed its review of the Gateway Study Area Draft Alternative Urban Area-wide Review (DAUAR) to determine its accuracy and completeness in addressing regional concerns. The DAUAR analyzes the potential impacts of four development scenarios on approximately 135 acres located in Edina, MN. 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 W. and Fred Richards Golf Course on the north; and the Edina/Bloomington border on the south. The study area currently contains a mix of land uses totaling 1,904,000 gross square feet (g.s.f.). These include: light industrial/warehouse and commercial/office development, (1,873,000 g.s.f.), and residential land uses, (31,000 g.s.f.). Under the four scenarios evaluated, the project ranges from 31,000 to 1,581,000 g.s.f. of residential development and 3,332,000 to 4,572,000 g.s.f. of commercial/office/light industrial development.

Council staff finds the information in the DAUAR is incomplete to determine the impact of the development scenarios to the Metropolitan Disposal System. The DAUAR also raises issues of consistency with Council policies in several areas as described in the following sections.

**Mitigation Plan:**  
**John Dillery, Metro Transit, (612-379-7773)**

#### **Transit**

The DAUAR doesn't mention bus service. In addition to being a significant mode of transportation, bus transit service is also a potential method of mitigating traffic congestion in the AUAR study area. The high-density development proposed in Scenarios 2, 3 and 4 would support increased transit use, especially if high-density housing is provided as proposed in Scenario 4. This is supported in the DAUAR document, (page 107), where it states, "As the general population of Edina continues to age, there will be an increasing need for senior housing, especially in mixed-use developments where acquisition of personal goods and services do not require driving." The final AUAR, (FAUAR) should address transit service.

Metro Transit's main concern regarding the DAUAR is for pedestrian safety and pedestrian access to transit facilities. Access to transit and pedestrian/transit facilities are generally deficient in the study area and, in addition, will be negatively affected in the development scenarios proposed in the DAUAR.

The City's "Draft Mitigation Plan" for the Gateway Study Area, found on the blue pages 8 through 14, addresses traffic and transportation mitigation in Section G. The measures described in the mitigation plan seem to accommodate automobiles to the exclusion of other modes, such as bicycle and pedestrian traffic. The measures described add additional through lanes on already wide, pedestrian-unfriendly roads such as France Ave. (at Minnesota Drive) and double left turn and double right turn lanes at most of the intersections. Neither sidewalks nor pedestrian access are mentioned. This a real concern for transit service in the Gateway Study Area because bus riders are also pedestrians. Particular areas of concern for improved access and facilities include:

1. **Route 540/76<sup>th</sup>-77<sup>th</sup> Street.** The key bus route in the Gateway Study area is Route 540 76th/77th Street. This route provides a cross-town service from the Edina industrial area west of Hwy 100 to the Mall of America. Plans call for improved route frequency and the extension of the route to the Normandale Lakes Office Park in Bloomington.
2. **Route 6/ France Avenue.** Metro Transit provides frequent service on France Ave to/from Minneapolis to the Gateway Study Area via Route 6. Increased service is planned along France Avenue for this route and better pedestrian facilities are needed.
3. **France Ave, Minnesota Drive, Parklawn Ave and W 77th Street.** These streets have inadequate sidewalks in most areas. Sidewalks are discontinuous, most notably along France Ave northbound and along W 77th St. westbound. Where sidewalks exist, they are narrow, yet next to high volume roadways. Most bus stops are not currently ADA compliant.

These safety deficits should be addressed by the FAUAR. How and where will sidewalks, not just roads, be widened or provided in this study area? In addition to addressing safety concerns, the FAUAR also needs to describe improvements to non-motorized access both to and within the Gateway Study Area to create an up-to-date plan that recognizes the alternatives that exist to the single occupant automobile. There should be a section on this subject added to the FAUAR, complete with maps that, a) show existing bus stop locations and those stops requiring improvements to be ADA compliant, and b) document the sidewalk system and facilities as they now exist and how these systems should be enhanced. The City should also address pedestrian access to transit in its comprehensive plan update, (CPU).

**Item 8: Permits and Approvals; Item 27: Plan Compatibility**  
**Denise Pedersen Engen, (651-602-1513), Todd Graham, (651-602-1322)**

**Comprehensive Plan**

The City's 2008 CPU should incorporate policy and implementation measures to mitigate the effects of redevelopment in the Gateway Study Area. The DAUAR, page 104 indicates that implementing Scenarios 2, 3 and 4 would require the City's current comprehensive plan to be amended to allow for the proposed land uses and densities. The FAUAR should provide details on how such mitigation will be addressed in the City's 2008 CPU and/or in a comprehensive plan amendment (CPA).

**Population and Household Forecasts** Edina is estimated to have 21,100 households currently; the 2030 forecast is 22,500. Should the City decide to pursue development options 2 or 4, it will need to request the Council to revise (increase) Edina's household and population forecasts.

**Employment Forecasts** Development Scenarios 2 and 3 would allow for gross employment growth in Edina. The Metropolitan Council has forecasted Edina employment to grow from 53,000 in 2000 to 62,400 in 2030. So far this decade, Edina employment has declined substantially to a current estimate of 49,300. Even with development options 2 or 3, Edina is unlikely to reach its current 2030 Metropolitan System Statement employment forecast.

**Plan and Zoning Ordinance Compatibility**

State law considers a zoning ordinance to be an implementing measure for a comprehensive plan. Land uses allowed in a zoning district must also be allowed in the designated land use guiding applied to an area in the comprehensive plan. This must be taken into account as the City develops a CPA for the AUAR site and/or rezones properties in the AUAR study area.

**Item 18: Water quality - Wastewater**  
**Kyle Colvin, MCES, (651-602-1151)**

It appears that the regional disposal system that provides service to the AUAR study area is currently operating near its full design capacity and has insufficient capacity to accommodate the additional flows generated by the AUAR development (all alternatives). The projected wastewater flow, as outlined under each of the four development Scenarios, would cause a system impact to the Metropolitan Disposal System. However, the information in the DAUAR is not of sufficient detail to determine the precise impact of the AUAR development scenarios to the regional disposal system. Therefore, Council staff has determined that the DAUAR report is incomplete to determine the full impact to the regional disposal system.

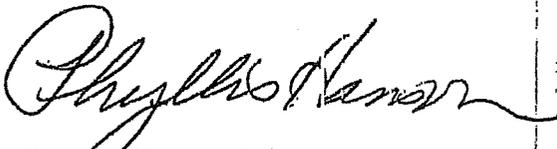
The FAUAR needs to contain more detailed information related to the specific Pentagon Towers and Pentagon Quad project (including staging, timing and additional flows). Once this information is available, a meeting between the Metropolitan Council staff and City of Edina staff will be necessary to discuss both short term and long term service options available for this area of the City.

**Item 21: Traffic**  
**Ann Braden, Transportation, (651-602-1705)**

The DAUAR appears accurate and complete regarding the analysis of related road and intersection impacts. Mitigation strategies such as additional turn lanes and lane extensions will be needed at various intersections within the study area to accommodate traffic from the different scenarios. Scenario 3 will have the largest impact to I-494 and TH 100 although deficiencies in weave segments and ramp junctions were attributable to increases in mainline volumes, rather than the increase in redevelopment traffic at the ramps. Expansion of I-494 between Highway 100 and TH 77 is included in the regional transportation plan as an expansion project needed by 2030. However it is not included in MnDOT's 10 year work plan and no funds are identified for it at this time.

The Metropolitan Council will look for these issues and concerns to be addressed in the FAUAR. Staff review of the FAUAR and mitigation plan will focus on its completeness and accuracy with respect to regional concerns and its consistency with regional policy. If you have any questions or need further information, please contact Denise Pedersen Engen, Principal Reviewer, (651-602-1513) or myself (651-602-1566).

Sincerely,



Phyllis Hanson, Manager  
Local Planning Assistance

cc: Jack Jackson, MultiFamily Market Analyst  
Tod Sherman, Development Reviews Coordinator, MnDOT Metro Division  
Russ Susag, Metropolitan Council District 5  
Keith Buttleman, Environmental Services  
Denise Pedersen Engen, Sector Representative  
Cheryl Olsen, Reviews Coordinator

08/15/07

## Cary Teague

---

From: Tom Gastler [tgastler@hotmail.com]  
Sent: Wednesday, August 15, 2007 11:20 PM  
To: Cary Teague  
Subject: UAR Comments

City of Edina  
Mr. Cary Teague  
Planning Director  
4801 West 50<sup>th</sup> Street  
Edina, MN 55424  
E-mail: cteague@ci.edina.mn.us

After reviewing the UAR I have three questions:

- 1) I did not see any reference to how the possible development options would affect the storm drainage to the north. I know that some improvements were made after the 1987 mega storm but wonder if redevelopment of this area would negatively impact the storm drainage coming from 72<sup>nd</sup> down Oaklawn Ave?
- 2) I noticed that there might be some dewatering required; possibly permanent dewatering. How would this impact Lake Edina? Given that there is a possibility that Southdale's water based heating/cooling permit might not be renewed so that water flow might be stopped. If I understand the mechanics some of that water currently ends up in Lake Edina. Without this and with additional dewatering would the lake be negatively impacted?
- 3) There was a very brief mention of the possible effects on police & fire in this report. Is this something that is covered in the actual development planning or should more detail be given in this report?

Thank you for your efforts on this document.

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## Hennepin County Transportation Department

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763-478-4000, FAX  
763-478-4030, TDD  
www.hennepin.us

August 9, 2007

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

Re: Draft Alternative Urban Areawide Review (AUAR)  
Gateway Study Area

Dear Mr. Teague:

This letter provides comments on the draft AUAR for the Gateway Study Area located north of I-494 between TH-100 and France Avenue (CSAH-17) dated July 3, 2007.

### *Existing and Future Roadway Operations for France Avenue*

- We were somewhat surprised by the AUAR's portrayal of the existing operations of France Avenue as being "uncongested" today. We perceive that this is not the case, and believe that perhaps the erroneous conclusion was reached in part due to the methodology used for the planning level analysis discussed on page 66.
- Individual lane utilization is very unbalanced on France Avenue due to the high volume of turning vehicles. This unbalanced lane utilization leads to spillback that affects multiple intersections along the corridor. The Highway Capacity Manual methods for arterial roadways do not account for this type of phenomenon.
- One good example of this type of occurrence is the southbound movement from France Avenue to I-494. The rightmost southbound lane experiences a very high utilization due to the fact that both the westbound ramp and eastbound loop to I-494 are on the right side. Drivers typically try to anticipate the upcoming turn a few blocks in advance, so the spillback on a typical p.m. peak hour often stretches from West 78<sup>th</sup> Street back almost to West 76<sup>th</sup> Street. Our studies have found that 55 % of the southbound p.m. peak hour traffic is actually destined to these two ramps to I-494.
- We have recently retimed our signals to improve the progression on France Avenue which has reduced these spillback queues somewhat, however adding many hundreds of vehicles in the peak hour onto southbound France Avenue will likely have a significant impact.

### *Anticipated Traffic Growth*

- The AUAR asserts that background growth was added to account for other area developments, however the report's volumes show only a very slight addition beyond the trips added by the proposed development scenarios. For example, the base 2005 ADT of 28,700 on France Avenue between West 76<sup>th</sup> Street to Minnesota Drive (Table 21-7) is only projected to grow to 29,600 ADT by 2030 for Scenarios 1 and 4 (Table 21-14). This is only about a 3% growth in 25 years for the proposed development including background growth.
- The average Hennepin County roadway is growing about 2 % per year (64 % increase in 25 years). The recent Greater Southdale Area Study completed for Edina in 2005 projected a background traffic growth rate of 0.5 % per year (13 % increase in 25 years). The Southdale Study also anticipated an overall 30 % increase in area tripmaking over the next 20 years due to redevelopment and new mixed uses.

We believe these two issues should be resolved before the AUAR is finalized. Thank you for the opportunity to review the report. If you have any questions, please call me at (612) 596-0354.

Sincerely,

Robert H. Byers, P.E.  
Senior Transportation Engineer

- c. James Grube – Director of Transportation and County Engineer  
Tom Johnson - Transportation Planning  
Tod Sherman – Mn/DOT Development Reviews  
Wayne Houle – Edina City Engineer and Dir. Public Works

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August 6, 2007

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

**Re: Draft AUAR – Gateway Study Area**

Dear Mr. Teague:

The City of Bloomington appreciates the opportunity to comment on the Draft Alternative Urban Areawide Review for Edina's Gateway Study Area (the Draft AUAR). The City of Bloomington also looks forward to working jointly with Edina to proactively plan for the future of the area bounded by France Ave., I-494, TH100 and the Fred Richards Golf Course. Although this area is divided by a City boundary, it clearly functions as one neighborhood and will benefit from our cooperative planning efforts. Bloomington's review of the Draft AUAR has focused on opportunities and challenges that we jointly face in this redeveloping area.

On August 6, 2007, the Bloomington City Council approved the following comments.

1. **Wastewater.** Properties in Bloomington and in most of the Gateway Study Area of Edina rely upon MCES Interceptor BN-499 for wastewater service. Recent City of Bloomington flow monitoring shows that this MCES interceptor is near full capacity today in the vicinity of 84<sup>th</sup> Street and France Avenue. Given present conditions, no additional flow can be added in the portions of Bloomington and Edina upstream of 84<sup>th</sup> and France without danger of property damage from interceptor surcharges.

Edina, Bloomington, and WSB representatives have met with MCES officials to discuss the interceptor concerns. MCES is currently reviewing existing flows and development forecasts in order to make a decision on future improvements to the MCES interceptor near 84<sup>th</sup> and France. In addition to the long-term solution of replacing a segment of the interceptor with larger pipe, the Draft AUAR points out that a potential short-term partial solution involves adjusting the pumping cycles at MCES Lift Station #10 to reduce the peaking characteristics of flows downstream.

Bloomington looks forward to working with Edina and MCES on a regionally funded solution to the MCES interceptor capacity constraints that will allow development in the Gateway Study Area to proceed in a timely fashion. Ideally, these discussions will be far enough along to allow the Final AUAR to include:

- Information on the timing of potential MCES improvements and therefore the time constraints on the commencement of redevelopment within the Gateway Study Area and
- Information on the extent to which modifications to the pumping cycles at MCES Lift Station #10 could free capacity downstream in MCES Interceptor BN-499.

**2. Storm Water Management.** Bloomington anticipates additional discussions with Edina on the potential expansion of South Pond (also commonly referred to as the "Border Basin") to improve the management of storm water quality and quantity in the area. Thinking of long-term redevelopment in the area, Bloomington would like to see South Pond expanded in a manner that would maximize its ability to serve as an amenity.

Bloomington has considered enhancement of South Pond in the past, but has delayed submitting a petition to the Nine Mile Creek Watershed District due to an area landowner request that relates to soil stability. The Cities of Edina and Bloomington should work with Nine Mile Creek Watershed District to discuss storm water quantity and quality improvement alternatives that are sensitive to area conditions, including soils.

### **3. Transportation.**

A. One traffic mitigation strategy not mentioned in the Draft AUAR is the addition of westbound I-494 access at East Bush Lake Road. Bloomington has been working on this strategy with the Federal Highway Administration and MnDOT for several years. The addition of westbound I-494 access at East Bush Lake Road would benefit the Gateway Study Area and merits special mention in the Final AUAR and inclusion in the mitigation plan. Bloomington looks forward to working cooperatively with Edina to encourage construction of westbound I-494 access at East Bush Lake Road.

B. Another mitigation strategy not mentioned in the Draft AUAR that merits consideration for the Final AUAR is the creation of a continuous east-west parallel arterial north of I-494 from France Avenue to East Bush Lake Road. This strategy would involve realigning 76<sup>th</sup> Street, 77<sup>th</sup> Street and Edina Industrial Boulevard to serve as one continuous parallel arterial, similar to American Boulevard on the south side of I-494. This improvement would facilitate improved traffic flow while encouraging additional redevelopment in the area.

C. Figure 21-4 and the text on Page 82 indicate that the same trip distribution assumptions were used for each of the four development scenarios. Bloomington requests that Edina reexamine this assumption in the Final AUAR given that varying land use scenarios (residential vs. non-

residential uses for example) typically result in varying trip distribution, especially in regards to inbound vs. outbound trips during the AM and PM peak periods. From a Bloomington perspective, the assumed trip distribution to/from the east on I-494 and to/from the south on Normandale Boulevard seems low for all four scenarios. The trip distribution assumption from the west on I-494 and W. 78<sup>th</sup> Street seems high in the PM period.

D. Prior to preparation of the Final AUAR, Bloomington requests that Edina and Bloomington staff meet to discuss several details related to the traffic impact analysis, especially the forecast traffic conditions on East Bush Lake Road in Bloomington. For example, the Draft AUAR states that the 2030 level of service for the American Boulevard and East Bush Lake Road intersection will be LOS F +100 in the AM peak and LOS A in the PM peak. A recent traffic study prepared for Bloomington by SRF (with higher Bloomington development assumptions) looked at the same intersection in 2030 and forecast a LOS B in the AM peak and a LOS B in the PM peak. Similar differences in forecast levels of service exist for the East Bush Lake Road intersections with the I-494 North Ramp, I-494 South Ramp and 78<sup>th</sup> Street. Given the large discrepancy between the Draft AUAR and a similar analysis done by SRF, Bloomington is concerned there may be a technical error in the Draft AUAR. If there is not a technical error, then Bloomington needs to better understand the impact of Scenario 2 on East Bush Lake Road in Bloomington. In either case, it would be beneficial for traffic engineering staff from Bloomington and Edina to meet. Prior to the meeting, Bloomington requests a complete copy of the traffic study given that the turn movement figures do not depict the East Bush Lake Road and American Boulevard intersection and do not depict 2030 turn movements.

E. Table 21-3 states that East Bush Lake Road from American Boulevard to W. 78<sup>th</sup> Street is "two-lane with turn lanes". It should read "four-lane with turn lanes".

F. Table 21-14 appears to conflict with Tables 21-17 and 21-18, with respect to ratings of congestions levels. For example, Table 21-14 classifies East Bush Lake Road from American Boulevard to W. 78<sup>th</sup> Street as "uncongested" in 2030, while Table 21-17 states that in 2030 all four modeled intersections in this stretch of East Bush Lake Road will operate at LOS F during the AM peak period under Scenario 2.

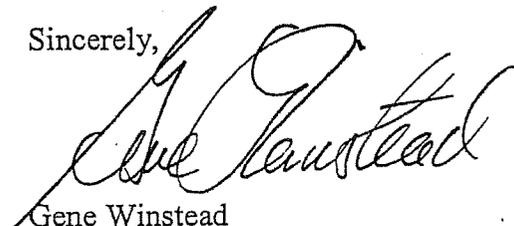
4. **Cumulative Impacts.** On Page 108 and in Figure 29-1, the Draft AUAR depicts "Current Adjacent Redevelopment Proposals". The text states that only Bloomington developments that are "approved and certain" are included. In regards to Figure 29-1 and Table 29-1, please note:

- Bloomington approved final development plans in April 2007 for a 285,000 square foot office building at 8200 Norman Center Drive. The project is commonly referred to as the "8200 Tower". The developer is United Properties.
- The shading for Area #2 south of American Boulevard should be removed. The Duke Realty project is north of American Boulevard.
- Bloomington has received an application (not yet approved) from the Richdale Group to develop 418 apartment units at 5100 W. 82<sup>nd</sup> Street. An EAW for the project will be released soon.
- There are several other Bloomington projects within the area depicted in Figure 29-1 that have received Bloomington zoning approval over the past 10 to 20 years but that may not be characterized as "certain" given the time elapsed since approval.

5. **Notification.** The City of Bloomington requests to be notified upon the receipt of applications for development projects within the Gateway AUAR area.

Thank you in advance for consideration of Bloomington's comments. Should you have any questions regarding this letter, please contact Larry Lee, Community Development Director, at (952) 563-8947.

Sincerely,



Gene Winstead  
Mayor

Copy: James Hovland, Edina Mayor  
Gordon Hughes, Edina City Manager  
Wayne Houle, Edina Public Works Director

## Cary Teague

---

From: Jackie Hoogenakker  
Sent: Thursday, July 26, 2007 2:13 PM  
To: Cary Teague  
Subject: FW: Notice of Public Hearing coming your way

I finally remembered to pass this on to you. J -----Original Message-----  
From: Rick.D.Beaver@seagate.com [mailto:Rick.D.Beaver@seagate.com]  
Sent: Friday, July 20, 2007 2:10 PM  
To: Jackie Hoogenakker  
Subject: Fw: Notice of Public Hearing coming your way

This email is in response to the Gateway AUAR. My name is Rick Beaver and I work at the Seagate site at 4801 West 50th Street. I've been assigned the duty follow this issue and see how, if any, impacts it will have on Seagate. Can you please copy me on any minutes from the July 24 public review meeting. This can be via email or regular mail at:

Rick Beaver  
NRW122  
7801 Computer Ave. So.  
Bloomington, MN 55435

Thanks.

Rick Beaver  
Sr. Facilities Engineer  
Seagate Technology  
(952) 402-7714

----- Forwarded by Rick D Beaver/Seagate on 07/20/2007 01:36 PM -----

Mark A  
Frommelt/Seagate  
(952) 402-7492

Rick D Beaver/Seagate@Seagate

To

cc

07/19/2007 09:48  
AM

Subject

Fw: Notice of Public Hearing coming  
your way

Please cover this and advise if issues.

----- Forwarded by Mark A Frommelt/Seagate on 07/19/2007 09:47 AM -----

Steve L  
Haugen/Seagate  
(952-402-7719)

Mark A Frommelt

To

cc

07/19/2007 09:30  
AM

Subject

## Cary Teague

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**From:** Nels P. Nelson [nnelson@barr.com]

**Sent:** Wednesday, July 25, 2007 2:31 PM

**To:** Cary Teague

**Subject:** Gateway AUAR

Mr. Teague,

My interest in the Gateway project is mainly personal and based on walking through the area numerous times on my way to work. I do not comment as a representative of Barr Engineering Co.

I would like to make two observations on the AUAR:

1. The figures do not appear to be posted on your website. Without the figures the AUAR as posted is difficult to follow.
2. The AUAR does not discuss the history of the site. The response to Question 25 seems to overlook the question of whether the Pentagon Park office development had any significance in the history or development of the City of Edina. Perhaps, in addition to the State Historical Society the preparers ought to have consulted with the Edina Historical Society. My personal observation is that the buildings have an unusual appearance and internal layout and are not at all like the current crop of office buildings.

According to the April 27, 2007, Business Journal, Pentagon Park was one of the first corporate campuses in Minnesota and was among the first developments by the Rauenhorst Corp., predecessor to Opus Corp. The people who originally planned, built and worked in it are probably passing away. Therefore I suggest that since the structures are both intact and significant, their demolition will be an environmental impact that should at least be considered in the AUAR and subsequent issuance of permits for demolition. As a mitigation suggestion, would it be possible, at a minimum, to provide documentation of the structures and possibly the oral history of the project so that 100 years from now this part of our history will at least be knowable, if not intact?

Thanks for your attention.

Nels Nelson  
5917 Kellogg Ave. S.  
Edina, MN.

952 926 4252

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**From:** BetteEdina@aol.com [mailto:BetteEdina@aol.com]  
**Sent:** Sunday, July 22, 2007 5:00 PM  
**To:** Jackie Hoogenakker  
**Subject:** Draft AUAR Report - Edina

Hello,

I have received notice of the upcoming meeting on July 24 regarding the AUAR Report to review the results of the environmental review process for the Gateway Area. My backyard property at 4936 Poppy Lane is adjacent to and directly behind the entry ramp onto Hwy. 100 North from 77th Street.

The homeowners whose property borders the entry ramp onto Hwy. 100 N from 77th Street have already pled their case in the past regarding the noise and exhaust pollution due to our proximity to the highway. Especially during peak traffic times, conversations cannot be heard while sitting on the deck of my home due to the noise, nor can the stench of exhaust fumes be tolerated while outside in the backyard. We petitioned for a noise barrier of some sort but were told they would only build one 8 feet tall and that we would have to pay for it. This blatant disregard for the health and well-being of Edina's citizens was considered to be an abomination at that time. Should the Gateway development be allowed to go forward, I fear that the noise and pollution will only become more unbearable and will severely depreciate the value of our existing properties. The increase in traffic over the years has only lessened the appeal for potential buyers of our properties, and any additional adverse effects will only serve to further diminish the value.

Should there be changes slated to the intersection at 100 and 77th in an effort to widen and expand it, I would demand that concrete noise barriers be erected along the entrance ramp onto 100 N from 77th Street, similar to the noise barrier at Hwy 100 N and W. 70th Street. The irony is that there aren't even homes directly behind that noise barrier which has been there for many years now, but those living with the on-ramp literally in their backyards haven't been able to realize an effective wall against the traffic noise and exhaust pollution.

There is also the question of their obtaining easements to access some of our backyard property to expand the on-ramp to 100 N from 77th Street. I as well as my neighbors would appreciate being informed of any potential of this occurring.

In addition, currently the storm sewer drainage hole located between my property and that of my neighbor's to the south of me routinely overflows when we have heavy rains such that a large amount of debris of all sorts is left on our yards when the water subsides. This would only worsen if this development goes forward and something would have to be done to remedy the situation.

These are my concerns regarding the Gateway development as a resident within the affected area. I would appreciate special consideration given to these issues as well as any feedback you could provide. Thank you.

Bette Anderson  
4936 Poppy Lane  
Edina, MN 55435  
952-486-8834  
[betteedina@aol.com](mailto:betteedina@aol.com)

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Get a sneak peek of the all-new [AOL.com](http://AOL.com).

Email - Cary Teague 20070815 080202AM.txt

From: Cary Teague [cteague@ci.edina.mn.us]  
Sent: Wednesday, August 15, 2007 8:02 AM  
To: Andrea Moffatt  
Subject: FW: Draft AUAR and 4455 W 77th

Another comment...

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From: Jackie Hoogenakker  
Sent: Tuesday, August 14, 2007 4:14 PM  
To: Cary Teague  
Subject: FW: Draft AUAR and 4455 W 77th

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From: Neil Peterson [mailto:petersonoffice@aol.com]  
Sent: Tuesday, August 14, 2007 4:05 PM  
To: Jackie Hoogenakker  
Subject: Draft AUAR and 4455 W 77th

I am Neil Peterson, and I am part of the ownership of a building at 4455 W 77th. I did testify at the hearing and am submitting a follow up E mail because of the storm last night (Monday 8/13) that supports my concern and frustration.

I am convinced that the development you are proposing will exacerbate the 1) .flooding and 2). ground sinking that we and several neighbors are suffering.

1) Flooding: Last evening our back lot was completely under water, draining across 77th and areas north. As the limited capacity in the swamp filled we became the storage area. I observed that our neighbor, especially the Hotel directly to the south share the same flooding and sinking problem. We are apparently the properties negatively impacted the most.

2) Sinking: The parking and lawn perimeter area of our building has sunk over 2 feet in the last few years. This year has been the worst. We once again have had to raise the driveways to even access the building, which may not be possible the next time because of the incline. Our tenant is becoming increasingly irritated, as are we, especially as we see the development activity on the Bloomington side, and now this site, which will drain toward us too.

My position:

I understand that the water issue is that of the Water Shed District. I also know, the City of Bloomington and/or the District is permitting a sur-charging of the vacant properties north of the pond area along the freeway. That "dewatering" I believe, contributes to our problem to the point that I am seeking professional engineering advice.

Your plans to develop north of our site and utilize this same swamp as part of the drainage, is really going to float us away.

Sincerely  
Lindue L L C  
Neil Peterson  
9640 xylon ave so, Bloomington 55438  
952 941 1822