

Gene L. Winstead
Mayor

Mark Bernhardson
City Manager

December 17, 2001

Mr. Chris Roy, P.E.
MnDOT – Metro Division
1500 County Road B2
Roseville, MN 55113

RE: Final Environmental Impact Statement – I-494 Reconstruction

Dear Mr. Roy:

On December 17, 2001, the Bloomington City Council authorized transmittal of the following comments on the I-494 Reconstruction Final Environmental Impact Statement (FEIS).

The City of Bloomington strongly supports the reconstruction and expansion of I-494 to serve as the backbone of a multi-modal transportation network in the corridor. The No-Build alternative to the project must be rejected as it would create unacceptable levels of congestion, limit further economic growth, hinder efforts to improve transit, and divert future trips onto local roadways. Funding for the project should be pursued immediately. In the absence of full funding, the project should move ahead in an incremental but consistent fashion.

Bloomington challenges all stakeholders to pursue a plan for the corridor that looks to the future and beyond the capacity improvements of a typical highway expansion that will include:

- sites reserved for transit facilities;
- linear right-of-way set aside for future transit use;
- high quality parallel arterials;
- well designed collector distributor (C-D) roads;
- improved travel demand management (TDM);
- advanced transportation system management (TSM);
- additional grade separated vehicular crossings to relieve congestion at interchanges;
- additional opportunities for non-motorized crossing; and
- safety enhancements.

The City recognizes that the project needs space to construct the transportation improvement. We request that as opportunities present themselves to minimize acquisition impacts, MnDOT would respond to such opportunities. It is vital that the Minnesota Department of Transportation (MnDOT) work closely with Bloomington and affected property owners to minimize impacts. Owners of homes slated for acquisition should have the option to be acquired early if they so choose. We appreciate MnDOT's approach of being willing to accommodate the relocation portion of the early acquisition program presently being developed along the Bloomington portion of the I-35W corridor. We view this as a "win-win" situation.

In commercial and industrial areas where usable remnant parcels will be created, MnDOT should work with the City and interested developers to encourage pre-construction redevelopment that preserves needed right-of-way, a technique that can substantially reduce costs. While there is no way to fully avoid

impacts from such a major reconstruction project, project staging and construction should be done in a manner that minimizes nuisances to surrounding businesses and residents while retaining mobility and access.

1. **Section 3.4 The Proposed Project** (Pages 3-4 to 3-44)

A. Full eastbound and westbound access to I-494 is necessary at East Bush Lake Road. The City approved a resolution for the third lane project including the request for MnDOT to pursue funding for the westbound I-494 movements to be accommodated with that project. Reconstruction of the interchange occurs with the third lane project, which is the first phase of construction, and will include the realignment of Green Valley Drive in the southeast quadrant of the interchange prior to the commencement of the interchange reconstruction. In the event that the preferred alternative for providing access to westbound I-494 from East Bush Lake Road is deferred, the stakeholders must pursue an alternate westbound access. For further discussion of Bloomington's position on the East Bush Lake Road/I-494 Interchange, please reference the attached letter on the issue from the City to MnDOT dated 11/7/01.

B. Bloomington recommends that access from Normandale Boulevard to the frontage road in the southwest quadrant of the TH 100/I-494 Interchange, originally slated for closure in 1977 with reconstruction of Normandale Boulevard, be completed by 2004 for safety and transportation reasons.

C. The project design includes the elimination of the recently constructed 82nd Street bus transfer station, which was constructed on I-35W right-of-way. Previous MnDOT designs for I-35W improvements incorporated a multi-modal transit transfer facility at 80th Street. The current MnDOT design, however, does not include such a transit facility. Bloomington recommends incorporation of a multi-modal transit/transportation facility in this vicinity into the design.

If government is to fully address the transportation needs of the public in this corridor over the coming decades, it will need to look to inclusiveness of alternative forms of transit. The region is taking steps in this direction by establishing light rail transit in the Hiawatha Corridor and high speed, limited stop bus service in the I-35W corridor. These transportation system components will succeed only if integrated into a multi-modal network. The public must be able to easily transfer between modes at transfer stations and park and rides to access diverse destinations.

Improved transit opportunities between suburban communities along the I-494 corridor must be accommodated with the rebuild of the corridor. This service may initially be provided by a high speed, limited stop bus service along I-494. The inclusion of continuous shoulder lanes along with HOV bypasses is a positive step toward enabling such service. Convenient multi-modal transfer stations at appropriate intervals along the corridor would also be helpful.

Bloomington encourages both MnDOT and Metro Transit to work with the City to identify locations along the corridor for multi-modal transfer stations and park and ride accommodation for inclusion in the final design of the project.

D. The preferred alternative sets aside 26 feet in the median of I-494 for "future undetermined transportation use." The document is unclear in segments of the project for which the 26-foot median is proposed. Figure 3.13 depicts the median as being reserved solely between TH 100 and TH 77, whereas Section 3.4.2 on Page 3-5 states that the median will be reserved between TH 169 and 24th Avenue. Please clarify. The City of Bloomington endorses setting aside a minimum of 26 feet in the median for future transit or general transportation use for the **entire** length of the project.

E. The project requires relocation of 80th Street near the southeast quadrant of the TH 100/I-494 interchange. The preparation of the final design for the project in this area will require MnDOT participation with the City of Bloomington in arranging the final design to blend with adjacent property and at the same time provide a workable design for the transportation network.

F. In several locations, the project creates the need to realign parallel arterials. Over the years, Bloomington has gone to great effort to accommodate rights-of-way needs in anticipation of future realignment. It is requested that the realignment of such parallel arterials be completed prior to principal arterial construction commencing. A viable parallel arterial system will be vital to provide route options when lane closures occur for project construction.

G. To create a serviceable transportation network, the Nord Avenue bridge over I-494 together with its reliever route connections should be included as part of the I-494 reconstruction project. To illustrate the importance of a Nord Avenue crossing, imagine the impact to the I-494 interchanges at Penn and France Avenues if there were not a crossing in place at Xerxes Avenue. The Xerxes Avenue bridge presently accommodates approximately 13,000 vehicles per day. The Nord Avenue bridge will provide similar and vital relief to both the France Avenue and TH 100 interchanges.

H. HOV accommodations should be included with the appurtenant facilities along the I-494 corridor.

I. Sidewalks and bike lanes should be included on bridges over I-494. Existing pedestrian crossings (such as at 2nd Avenue) should be retained.

J. All bridges should be designed with foresighted provisions for continued serviceability, i.e. anticipated expansion needs.

K. Bloomington requests that signal/interchange improvements at the TH 169/I-494 interchange be part of MnDOT's Capital Improvement Program in the near future, since this interchange is not included in the I-494 FEIS.

2. **Section 5.2.3.3 Mitigation - Right-of-Way and Relocation** (Page 5-15)

A. The City of Bloomington has been working with MnDOT and residential property owners to have a program that allows early acquisition of homes if the owners so choose. The City recommends continued implementation of the program along with possible expansion for commercial properties, and requests that reference to the program be included in this document.

B. 32 commercial properties in Bloomington are slated for total acquisition in conjunction with the project. In several cases, usable and highly desirable remnant parcels will remain after MnDOT secures needed space for the improvement. There may be market demand for redevelopment in some of these areas prior to the commencement of the project. In this case, the City believes it would be appropriate for MnDOT to work with the City and the landowners to allow early acquisition of the property to secure the needed right-of-way in a manner that reduces the ultimate cost of acquisition to the taxpayer and allows for more timely redevelopment. Bloomington encourages further discussion and recommends reference to a potential program in the document.

C. Bloomington requests that an Official Right-of-Way Map be prepared as soon as possible to facilitate land use planning, transportation network planning, and to assist the public. Right-of-way acquisition should progress in a manner that minimizes public cost and disruption to residents and businesses.

3. **Section 6.2.4 Noise Mitigation** (Pages 6-28)

The project must include effective noise retardation design features adjacent to residential land uses. In Bloomington, that includes the residential area south of I-494 and west of East Bush Lake Road as well as the residential areas on either side of I-35W north of 90th Street (the southern limit of the project). The document does not discuss the status of noise walls along I-35W between I-494 and 90th Street. Please add analysis of these areas to the document. There are some noise walls in place; other segments deserve careful consideration. The City of Bloomington finds it mandatory that any noise wall removed to accommodate construction be replaced with a new noise wall of equal or improved effectiveness. Construction of replacement noise walls should occur before the existing noise walls are removed when possible.

4. **Section 6.3 Surface Water Drainage** (Pages 6-36 to 6-78)

A. Modifications to storm water flows due to the project necessitate the replacement of the 84th Street bridge over Nine Mile Creek. Replacement of this bridge should be shown as part of the project in the final design, must be closely coordinated with the City of Bloomington and Nine Mile Creek Watershed District, and must occur before increased storm water flows are generated by the project. This 84th Street crossing may require replacement in conjunction with the third lane project.

B. Lower Penn Lake, as a fishable, recreational water body, must, for water quality reasons, be excluded from receiving direct surface water drainage. Water quality enhancements must occur prior to the run-off flowing into Lower Penn Lake. Bloomington recommends that water exiting the proposed Irving Pond flow to Upper Penn Lake.

C. The City supports the policy of locating dual-purpose ponds at the outlets of all I-494 storm sewer systems. The ponds should be designed to meet N.U.R.P. guidelines.

D. It is requested that further evaluation of a stormwater tunnel be explored from the Penn Avenue low point to the Minnesota River. This would include a gravity outlet for the Penn Avenue/I-494 low point as well as a gravity outlet for Wood Lake or other corridor basins or flood prone low points.

5. **Section 8.0 Final Section 4(f)/6(f) Evaluation** (Pages 8-1 to 8-22)

A. The City of Bloomington reiterates the desired mitigation for loss of 4(f) property (Beaverbrook Ballfields and unnamed open space along East Bush Lake Road) and 6(f) property (Highwood Corridor) as being that adopted by the City Council on 3/26/01 and transmitted to MNDOT in a 3/29/01 letter from Parks and Recreation Manager Randy Quale (which is included as an attachment in the FEIS).

B. All wetland mitigation must be in compliance with Bloomington's Comprehensive Surface Water Management Plan and the Nine Mile Creek Watershed District Water Management Plan.

C. Figure 8.2 depicts an area adjacent to East Bush Lake Road as "parkland proposed for acquisition". This area is not parkland per se, but city-owned unnamed open space.

6. **Section 11.7 Other Major Actions** (Page 11-6)

This section states that reconstruction of the I-35W/TH 62 commons area will begin in 2001. Please update to reflect the current status.

7. **General**

A. The project will necessitate relocation of utilities within the City of Bloomington. Please include discussion of utility relocation impacts in the document. Impacted utilities must be relocated in conjunction with the project.

B. Bloomington strongly encourages MnDOT to develop a master bridge design that will provide cohesive and attractive bridge features (architecture, landscaping, color, railings, etc.) for all bridges to be replaced by the project in Bloomington.

As a major stakeholder in the project, the City of Bloomington stands ready to partner with MnDOT and others to bring the project to fruition at the earliest possible date. Thank you for the opportunity to review the I-494 Reconstruction FEIS. If you have any questions regarding this letter, please contact Jim Gates, Deputy Public Works Director, at (952) 563-8730.

Sincerely,

A handwritten signature in cursive script that reads "Gene Winstead". The signature is written in black ink and is positioned above the printed name and title.

Gene Winstead
Mayor

November 7, 2001

Mr. Bruce Johnson
Minnesota Department of Transportation
Metro Division Design
1500 West County Road B2
Roseville, MN 55113

Re: I-494 Third Lane Project in the Vicinity of East Bush Lake Road

Dear Mr. Johnson:

The I-494 Third Lane Project was approved in concept at the Study Session of the Bloomington City Council on October 29, 2001. These plans will obviously have some modifications, as the layout becomes final construction drawings. One of the concerns expressed by the City Council was the lack of a westbound access to I-494 from the East Bush Lake Road area. The City Council requested that the Minnesota Department of Transportation continue to seek funding between now and the initiation of construction of that segment of the Third Lane Project.

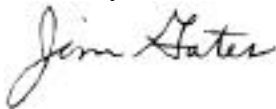
We would also like to thank you for the opportunity to comment on the Preliminary I-494 Third Lane Plan from 2500 feet west of East Bush Lake Road to 2600 feet east of TH 100. Please find below a list of comments for your consideration in continuing to develop the layout toward construction plans for the project.

- It is requested that a six-foot terra cotta stamped concrete boulevard and eight-foot plain concrete walks be shown adjacent to both sides of Green Valley Drive. This segment of Green Valley Drive is a continuation of the Ring Route Corridor, which is a parallel arterial to I-494. The City Council has endorsed the concept and we have that standard six-foot stamped concrete boulevard and eight-foot walk approved throughout the corridor.
- It is requested that a four-foot boulevard, eight-foot walk, and two-foot clear zone be constructed on the west side of the East Bush Lake Road bridge and a four-foot boulevard, six-foot walk, and two-foot clear zone along the east side of the East Bush Lake Road bridge. This should be accommodated to the south terminus of the project. This will enable the City of Bloomington to continue this design down to the regional park at Normandale Lake and 84th Street. It is assumed that Hennepin County will request standard concrete for the center medians on East Bush Lake Road (County Road 28).
- It is requested that the East Bush Lake Road segment north of the bridge have the space availability for double-left turn lanes at the intersection of East Bush Lake Road and West 78th Street. This would be a continuation of the right turn lane shown along the west side of East Bush Lake Road. This space is requested due to the recent transportation studies done for the area which all include the northbound double-left turn lane to westbound 78th Street accommodation.

- It is requested that single right turn lanes with 100-foot radius and a 22-foot separated turn lane be accommodated. This allows a WB-62 vehicle to make the movement through the intersection.
- The double right-turn accommodation for WB to NB at Green Valley Drive is suggested to have a 120 foot radius to allow truck traffic not to interfere with adjacent vehicle traffic.
- The center medians on Green Valley Drive are requested to include landscaping treatments similar to that developed along other sections of the Ring Route Corridor. Please see the enclosed plan sheet as an example of that landscaping theme.
- It is requested that the radius at approximately 15+00 Green Valley Drive be modified to have a 460-foot minimum radius to accommodate a 35-mile an hour design speed. Bloomington realizes that this does impact the pond's design on the south side of Green Valley Drive. One possible modification would be the ponding area just south of the eastbound loop to East Bush Lake Road. This ponding area was included by private development adjacent to the project and is constructed within Bloomington right-of-way. The pond requires modification as a result of Green Valley Drive reconstruction, and therefore an enhanced modification would be possible.
- It is suggested that the ramps along I-494 have enough space adjacent to the I-494 mainline that the ramps do not totally have to be reconstructed with the rebuild of I-494. This would include the collector/distributor lane on the south side presently shown in conjunction with the rebuild of I-494. At the present time, the ramp shown on the plans would be impacted with that CD lane.
- It is assumed concrete curb will be along both sides of East Bush Lake Road to the terminus of the project.
- On East Bush Lake Road north of I-494, it is requested that six-foot boulevards and six-foot concrete walks be shown on both sides of the corridor to accommodate multi-modal movements in the corridor.
- It is suggested that six-foot shoulders be accommodated on the lengthy ramps to allow snow storage as well as disabled vehicle accommodations.

Again, the City of Bloomington appreciates the opportunity to comment on those plans. Please contact us if there are questions or comments regarding these suggestions.

Sincerely,



Jim Gates, P.E.
Deputy Director of Public Works

Enclosure

JG/kkl

CC: Chris Roy

