

**DATE:** December 11, 2000

**TO:** City Council  
Mayor  
City Manager

**FROM:** Rebecca Schindler, Planner  
Robert M. Sharlin, Planner

**RE:** Additional Information on Norman Pointe Office Development Final  
Environmental Impact Statement Adequacy Document

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This memorandum addresses comments submitted to the City of Bloomington concerning the Adequacy Decision for the Norman Pointe Environmental Impact Statement for the Duke-Weeks office development at 5501, 5503 and 5701 Green Valley Drive. A number of residents expressed concerns regarding the Adequacy Decision document at the November 20, 2000 City Council meeting. The concerns relate to development density, traffic, the traffic study conducted including the assumptions used for the analysis and the effects of ramp metering, the Ring Route, 84<sup>th</sup> Street and Normandale Boulevard intersection improvement, and pedestrian connections to the Normandale Lake area.

### **Comprehensive Plan History**

The Norman Pointe property has been designated for high intensity development since the City developed a City-wide land use plan in 1963. The area was guided for office use in the 1975 Western Area Plan. The land use guide plan designation in the 1980 Comprehensive Plan was Mixed Use. The Mixed Use with Mixed Focus land use guide plan designation was added in 1991.

The Scoping Environmental Assessment Worksheet (EAW) addressed the compatibility of the proposed project with the Mixed Use with Mixed Focus land use designation and found that the project is compatible.

The City completed a revision of the Comprehensive Plan in 2000, as required by the Minnesota Legislature. The land use guide plan designation for the Norman Pointe Office Development is designated Office as the Mixed Use categories were eliminated. The Norman Pointe Office area has consistently been guided office since the 1960s.

The Office designation allows professional and business offices and related accessory retail uses serving the needs of office building tenants. Due to compatible land use characteristics, hotels are allowed on sites guided Office, provided the site is appropriately zoned for a hotel and within one mile of a freeway interchange.

The proposed Norman Pointe Office project is a permitted land use in the Office designation. Planning staff will conduct a thorough review of the proposal once an application is received which will further address the compatibility of the proposed project with the Comprehensive Plan.

**Zoning: CO-1 Commercial Office**

The Norman Pointe Office Development is zoned Commercial Office, CO-1. The intent of the CO-1 zoning district is as follows:

“The Commercial Office Districts are intended to provide areas where offices, compatible office-like businesses, and high-density residential uses may be developed with the assurance that commercial uses with incompatible characteristics will not impede or disrupt the establishment of an attractive and cohesive grouping of mixed yet interrelated uses. These districts are to be applied only in areas adjacent to arterial or collector streets. Residential uses within these districts are appropriate provided they are subsidiary to office uses on the site.”

The permitted uses that are in the CO-1 district are offices, public uses, transit stations and accessory uses customarily incidental and clearly subordinate to permitted principal uses. The maximum floor area ratio (FAR) for nonresidential uses within the CO-1 district is 1.0 or one square foot of building floor area for each one square foot of lot area. Under the Planned Development ordinance, Section 19.38.01, the floor area ratio may be increased by twenty percent provided the provisions in the Code are satisfied.

**Traffic**

Traffic counts from January 2000 at the intersection of Normandale Boulevard and 84th Street indicated that the AM peak hour occurred from 7:15 AM to 8:15 AM and the PM peak hour from 4:30 PM to 5:30 PM. Eighty-fourth Street east of Stanley Avenue serves approximately the same average daily traffic volume in year 2000 (9,000 vehicle daily range) as it did ten years earlier. Eighty-fourth Street east of Stanley Avenue has a lower average daily traffic volume than it did 15 years ago.

The opening of Bridge Road over Normandale at 82<sup>nd</sup> Street, a component of the Ring Route system, which opened mid-year 1986, provides an alternate route for many trips in the subregion. The bridge over Normandale carries more than 5,000 vehicles per day at the current time. The Ring Route volume, i.e. 80<sup>th</sup> Street increases to 16,000 vehicles per day near France Avenue at the current time. For comparison, that is twice the volume of daily use on 84<sup>th</sup> Street just west of France Avenue. The Ring Route improvements have accommodated substantial traffic volume in contrast to those trips being on W. 84<sup>th</sup> Street.

The average daily traffic volume on Nine Mile Creek Parkway continues in the 2,500 or fewer vehicles per day range. The volume on that roadway has not increased appreciably for many years. It

continues to serve as an appropriate component of the Bloomington collector street network without substantial volume increase as the community maturity progresses.

### **Traffic Model Forecast for 84th Street – Directional Distribution**

The directional distribution presented in Figure 15 of the *Norman Pointe Office Development FEIS* uses the most current version of the Metropolitan Council’s travel demand model. The model is based on the 1990 Travel Behavior Inventory (TBI).

The 1990 TBI is a comprehensive travel survey of the Minneapolis-St. Paul metropolitan area and the first available since 1970. It documents when, why and how Twin Cities residents and businesses use the region’s transportation facilities.

The TBI used several surveys to gain a comprehensive overview of travel, such as home interview surveys, travel diaries, employee and employer interviews, traffic counts, roadway characteristics (e.g. number of lanes and posted speeds), employment inventory and aerial photography. All of this information was used as input to the regional travel demand model.

In 1998, the regional model was modified to include current population, household and employment information from each city and county in the metropolitan area, and significant improvements to the transportation network.

The travel demand model also includes the physical characteristics of the roadways in the network. In general and as in reality, these characteristics determine the type and amount of trips that a roadway would attract. For example, a freeway such as I-494 would serve longer trips because of limited access to the facility and higher speeds. Similarly, 84th Street would attract shorter trips in general because of relatively high number of intersections, traffic signals and stop signs and lower posted speeds. Additionally, 84th Street is discontinuous east of Penn Avenue. This would detract from its ability to serve longer trips.

The forecasts for the *Norman Pointe Office Development FEIS* also account for background traffic growth. Background traffic growth accounts for general growth and other development in the area. In this case, a rate of approximately 3 percent per year was applied to the existing turning movement counts at the 11 study intersections between years 2000 and 2005. This rate is considered high, but was used to include additional trips from United Properties’ new office building at 8331 Norman Center Drive.

Building I of the Norman Pointe Office Development is currently under construction. Building I is a 210,000-square-foot office. It is estimated to generate the following net new trips (compared to what is experienced before the two buildings at the site were demolished):

- ∑ 1,541 daily trips
- ∑ 218 AM peak hour trips
- ∑ 208 PM peak hour trips

The entire proposed Norman Pointe Office Development (four office buildings and one hotel) would generate approximately 78 trips in the AM peak hour and 75 trips in the PM peak hour on 84<sup>th</sup> Street.

### **Trip Distribution on Driveways**

Typically, trips are distributed on site driveways based on proximity, the size of the driveway (e.g. it is the main driveway to the building) and whether or not left turns are involved. Left turn movements take more time to complete than right turns. On average and for this study, it was assumed that 60 to 75 percent of trips from a particular approach would use the first driveway encountered and 25 to 40 percent of trips from that same approach would use the second driveway.

### **Mitigation Requirements for Each Scenario**

Traffic studies model the level of service (LOS) of an intersection to identify when roadway improvements are recommended. Figures 1-8 illustrate the recommended roadway improvements for each scenario analyzed in the traffic study (Table 1-1 of the DEIS). Generally, LOS A through D are considered acceptable in the City of Bloomington. Roadway improvements are identified for intersections that operate at LOS E or F. The project proposer has provided some funding to the city to initiate roadway improvements.

The improvements identified and recommended for the Scenario 2, No-Build and Scenario 5 Background are the result of current and future regional traffic conditions. These improvements are not precipitated by construction of the Norman Pointe project. Therefore, the improvements identified and recommended for the No Build (Scenario 2) and Background (Scenario 5) are not the responsibility of the project sponsor. The funding and construction schedule for the No Build and Background improvements are at the discretion of the local road authority and are beyond the control of the project sponsor. It should be noted that six intersections have recommended improvements under the No Build and Background conditions. Five of these intersections are on East Bush Lake Road.

Scenario 3 includes construction of Building II and III. The traffic study identified one intersection that would have a reduced level of service that is directly due to project construction. The intersection of Norman Center Drive and Bridge Road would change from LOS D to LOS F for the pm peak hour traffic, as compared to the No Build (Scenario 2). Thus, the mitigation recommended for Scenario 3 is installation of a signal at Norman Center Drive and Bridge Road. This would improve service at this intersection to LOS A.

Scenario 4, which includes construction of Building II, would result in direct service reductions at three intersections, as compared to the No Build (Scenario 2). The intersections of Norman Center Drive/Bridge Road, Norman Center Drive/Normandale Lake Boulevard and 84<sup>th</sup> Street/Normandale Lake Boulevard would have LOS D or F on at least one street and would require mitigation. The following mitigation would improve the levels of service D or above:

- ∑ Norman Center Drive/Bridge Road – install traffic signal (LOS A)
- ∑ Norman Center Drive/Normandale Lake Boulevard – install signal; add south bound left, through and right turn lanes; add dual east bound left turn lanes; and add an exclusive west bound right turn lane (LOS A).
- ∑ 84<sup>th</sup> Street/Normandale Lake Boulevard – modify the signal timing/phasing (LOS C or better)

The remaining Scenarios 5 through 8 include a combination of planned improvements and building construction phasing for year 2005. All of these scenarios would result in the same levels of service as Scenario 4. Thus, these scenarios would require the same mitigation as Scenario 4.

### **Ring Route**

The parallel arterial concept in the 79th/80th Street corridor, also known as the Ring Route, has been in existence since the late 1960's. This parallel arterial to the principal arterial of I-494 will serve short and medium length trips in a safe and capable manner. This enhances the principal arterial by keeping those short and medium length trips on the parallel arterial. Eliminating the short on and off trips to the principal arterial allows I-494 to handle traffic in a more efficient manner. Appendix A is attached to this document and provides additional information on the Ring Route.

### **Promoting Use of Ring Route**

The Bloomington ring route presently begins at East Bush Lake Road along Green Valley Drive, Norman Center Drive, Bridge Road over Normandale Boulevard and generally follows West 80th and 79th Streets 34<sup>th</sup> Avenue in eastern Bloomington. The ring route is functionally classified by the City and Metropolitan Council as an A Minor Arterial Reliever. The ring route provides access to adjacent development. As such, the ring route would serve short to medium-length trips that may otherwise use I-494, a principal arterial. According to Metropolitan Council functional classification guidelines, principal arterial routes serve trips longer than eight miles, with at least five continuous miles on principal arterial routes.

Perhaps the most important task for the City of Bloomington to complete in order to promote the use of the ring route is give the route a consistent name between East Bush Lake Road and the Mall of America. From there, other marketing tools could be used to promote the route's use, such as brochures for major employers and the local newspaper.

Additionally, the following tools could be used to encourage use of the ring route:

- ∑ Signing – Directional and trailblazing signing along with special route identification are recommended for strong inclusion with the roadway components and management system.

- Σ Intelligent Transportation System (ITS) – Information could be disseminated to motorists to encourage the use of the ring route using various ITS tools, such as Highway Advisory Radio, the Internet, and Variable Message Signs. Traffic signal timing is being designed to optimize travel times on the ring route while remaining consistent with its functional classification. Intelligent transportation system components will be incorporated in the area through coordination with MnDOT and Hennepin County.
- Σ Ramp Metering – As shown in the following section, ramp metering serves as a disincentive for short to medium-length trips using the freeway system. Ramp metering rates could be timed to optimize travel times. The City of Bloomington is working with Mn/DOT to determine what role the City could play in implementing such traffic management techniques. It should also be noted that ramp metering in the area could be significantly changed depending on the findings of Mn/DOT’s current study that is due to the Minnesota Legislature in February 2001.
- Σ Roadway Design – The physical design of the ring route would affect its efficacy as a parallel route to I-494. The number of through lanes, provision for turn lanes and driveway spacing are among many design elements that encourage its use.

These are just some tools that could be used to encourage the use of the ring route in Bloomington. Other measures exist that may be better suited to the existing and planned environment.

### **Ramp Meters and Effects on Traffic Analysis**

The Minnesota Department of Transportation’s Traffic Management Center (Mn/DOT TMC) compiled two sets of loop data for the segment of I-494 between TH 169/East Bush Lake Road and France Avenue. The first set of data included the highest sliding median hour volume for each entrance ramp to I-494 from East Bush Lake Road, TH 100/Normandale Boulevard and France Avenue in the morning (all hours before 12:00 PM) and afternoon (all hours after 12 PM). The second set of data included the median link volumes in the AM and PM peak periods (6 AM to 9 AM and 3 PM to 7 PM). The data were median values from the immediate four weeks before and after the meters were shut down in October 16, 2000. Only counts from Tuesday, Wednesday and Thursday from each of the eight weeks were used in this analysis.

Elwyn Tinklenberg, Mn/DOT Commissioner, announced on Monday, December 4, 2000, that 370 of the 430 ramp meters in the Twin Cities metropolitan area would be back in operation on Friday, December 10, 2000. The meters’ return to operation would include faster metering rates. The meters would also operate only between 6:30 AM and 8:30 AM in the morning and 3:30 PM and 5:30 PM in the afternoon.

Note that the ramp meter study is still in progress. The final report is due to the Minnesota Legislature in February 2001. As such, no other data from Mn/DOT are available at this time.

**Initial Findings** - The following are initial findings based on the loop data from Mn/DOT for the segment of I-494 between TH 169/East Bush Lake Road and France Avenue:

Link Volumes –

- ∑ The data did not show significant changes in link volumes on I-494 in either direction, whether the ramp meters were on or off. The highest absolute difference in volume was 3 percent.
- ∑ In the afternoon, the data did not show significant changes in link volumes on I-494 in the westbound direction. A reduction of 4 percent was the highest absolute change in volume computed.
- ∑ On the other hand, volumes on eastbound I-494 in the afternoon decreased between 11 percent and 17 percent when the ramp meters were turned off. The highest reduction was recorded on the segment of TH 169/East Bush Lake Road.

Ramp Volumes - Mn/DOT provided the highest sliding hour median ramp volumes for eight entrance ramps to I-494 between East Bush Lake Road and France Avenue, for the AM and PM periods.

AM Period -

- ∑ The ramp meters do not appear to have a significant impact on volumes on seven of the entrance ramps. The absolute volume differences ranged from 0.4 percent to 6 percent.
- ∑ However, the entrance ramp from northbound TH 100/Normandale Boulevard to westbound I-494 increased 24 percent when the ramp meter was turned off. The volume on the ramp increased from 366 to 455 vehicles in the hour between 7:25 AM and 8:20 AM.
- ∑ Overall, the highest sliding median ramp volume occurred approximately in the time of day before and after the ramp meters were turned off.

PM Period -

- ∑ Overall, the ramp volumes changed significantly when the ramp meters were turned off. The absolute change in volume ranged from 1 percent to 21 percent.
- ∑ Before the ramp meters were turned off, the highest sliding hour median ramp volumes for three of the eight ramps occurred between 12 PM and 2:35 PM. After the ramp meters were turned off, these volumes increased significantly and occurred during the peak travel period between 3 PM and 6 PM.
- ∑ Two entrance ramps showed volume decreases of 9 percent and 18 percent when the ramp meters were turned off. These two locations are the entrance ramp to westbound I-494 from northbound TH 100/Normandale Boulevard, and southbound TH 100 to eastbound I-494.

**Conclusions** -

- ∑ Turning off the ramp meters does not appear to have a significant impact on traffic operations in the morning.
- ∑ In the afternoon, the effects of turning off the ramp meters are significant. Turning off the ramp meters encourages shorter trips to use the freeway system in the peak travel period,

resulting in higher volumes on the entrance ramps but overall lower link volumes on I-494 and vehicle miles traveled (VMT).

Note that traffic counts on arterial routes parallel to I-494 would provide a more complete assessment of the impacts of turning off the ramp meters. At this time, however, this information is not available.

### **84<sup>th</sup> Street & Normandale Boulevard Intersection Improvement**

Citizens expressed concerns regarding the future reconstruction of the intersection of Normandale Boulevard and 84<sup>th</sup> Street. This project is currently identified as a recommended roadway improvement for Scenario 2, the 2003 No Build. The need to reconstruct this intersection is not directly related to project development, since it is recommended for the no build condition. Appendix B contains background information on the Normandale and 84<sup>th</sup> Street intersection improvement.

The intersection improvement at Normandale Boulevard and 84<sup>th</sup> Street is recommended for all scenarios in the traffic analysis, including the no-build alternative for 2003, Scenario 2. An environmental review must be completed prior to the construction of the overpass. The type of review depends on the source of funding. The use of funds from the federal government would require an Environmental Assessment (EA), while the use of state government funds may require the preparation of an Environmental Impact Statement (EIS).

#### ***Construction of a Grade-Separated Intersection of Normandale Boulevard/84<sup>th</sup> Street***

Traffic studies model the level of service (LOS) of an intersection to identify when roadway improvements are recommended. Generally, LOS A through D are considered acceptable in the City of Bloomington. Roadway improvements are recommended for intersections that operate at LOS E or F. The current levels of service for year 2000 are LOS D during the am peak hour traffic and LOS F during the pm peak hour traffic, at Normandale Boulevard/84<sup>th</sup> Street. Thus, the existing LOS for the pm peak hour is below acceptable levels and roadway improvements are recommended. Growth in background traffic (non-project related) through 2003 would result in LOS E in the am and LOS F in the pm peak hour traffic. Thus, both am and pm peak hour service would be below acceptable levels and roadway improvements are recommended.

Improving the safety and capacity of the Normandale Boulevard and 84<sup>th</sup> Street intersection is a priority for the City of Bloomington. Preliminary analysis has indicated that the intersection should be grade separated, such that Normandale Boulevard would bridge over 84<sup>th</sup> Street (**see attached graphic**). The City currently has adequate land holdings in the vicinity of the intersection to accommodate this design. Reconstruction of this intersection would improve the levels of service to LOS C for both the am and pm peak hour traffic. This level of service would be maintained with full construction of the Norman Pointe project.

Reconstruction of the Normandale Boulevard and 84<sup>th</sup> Street intersection would require preparation of a new environmental document that is separate the Norman Pointe Office Development Environmental Impact Statement that is currently underway. The specific notification and documentation requirements for the Normandale Boulevard and 84<sup>th</sup> Street intersection would be determined once a preliminary design has been created, funding sources have been identified and a preliminary schedule has been determined.

The environmental documentation would consider the potential significant environmental effects as described in the State's environmental rules. Based on the comments provided for the Norman Pointe project, citizens seem especially concerned regarding the potential affects to traffic speed on 84<sup>th</sup> Street, traffic noise, pedestrian safety and visual affects of the roadway reconstruction project. While each of these would be considered in a future environmental review, the following is provided based on the preliminary information available.

Noise – Elevated roadways decrease noise levels for nearby receptors by removing those receptors from the direct pathway of the sound. Generally, elevated or depressed roadways result in a 3 to 5 dBA decrease in noise levels at nearby receptors, as compared to at-grade roadways. Receptors that are more distant from the elevated roadway may experience slightly higher noise levels. However, the additional distance between the roadway and receptors allows the sound to dissipate and the noise impacts to be reduced.

Pedestrian Safety – The intersection improvements at Normandale Lake Boulevard and 84<sup>th</sup> Street would improve pedestrian safety. A signal and pedestrian crossings would be included in the redesign of 84<sup>th</sup> Street, which would be at-grade. Essentially, pedestrians would have fewer lanes of traffic to cross since north-south traffic would be above-grade.

### **Pedestrian Access to Normandale Lake**

The planned reconstruction of the Normandale Boulevard and 84th Street intersection includes a grade-separated access to local streets. This concept would separate through traffic on Normandale Boulevard through a bridge and vehicles turning left and right onto 84th Street would exit. Traffic on 84th Street would use ramps to access Normandale Boulevard/TH 100. The resulting signalized intersection on 84th Street would control left turning traffic from and to 84th Street and Normandale Boulevard. Therefore, the traffic volume at this intersection is significantly reduced, along with pedestrian conflicts with vehicles. The bridge section would be approximately 19 feet above the existing grade. The bridge design could include landscaping, architectural and urban design treatments to improve the overall visual affect of the bridge in relation to the surrounding environment.

### **East Bush Lake Road History and I-494 Update**

Representatives from the Minnesota Department of Transportation (MnDOT) stated the I-494 2003 third lane project will include an eastbound I-494 off-ramp to East Bush Lake Road, as well as an improved eastbound on ramp at East Bush Lake Road onto I-494. The project will

also include an East Bush Lake Road westbound I-494 on-ramp. The project has been programmed and funded, however, preliminary cost estimates are \$6 million higher than the projected budget.

### **Site Access via Green Valley Drive**

The additional lane construction on I-494 in the next three years would entail the realignment and reconstruction of Green Valley Drive to the west and south. The I-494 project is proposed to reconstruct Green Valley Drive as a cul-de-sac approximately 1,200 feet east of the reconstructed Norman Center Drive intersection. This would mean that Green Valley Drive could provide some access to Buildings I and IV only and that Norman Center Drive would provide the main access to the remaining portion of the proposed Norman Pointe Office Development.

The attached figure from the 1992 *I-494 Reconstruction FEIS* illustrates the conceptual plan for the I-494 reconstruction between TH 169 and France Avenue.

### **Citizen Comment Letters**

1) November 22, 2000 - Timm and Leanne Wienke

Comment: The residents expressed concern about the proposed Normandale Boulevard overpass over 84<sup>th</sup> Street. These concerns include the potential for increased noise and air pollution and an impact on the aesthetics of the neighborhood. They are opposed to the construction of the overpass.

Response: A memo from the Public Works Director, Charles Honchell, regarding the Normandale Boulevard overpass over 84<sup>th</sup> Street is included as Appendix A. The memo states “the City, for 10 to 15 years, has had a long-range plan to do a grade separation project at the intersection of 84<sup>th</sup> Street and Normandale Boulevard. Due to the lack of funds, this project has not moved forward to even the hearing stage and certainly not the construction stage. Construction would only be able to occur after funds were found, Environmental Assessments and/or Environmental Impact Statements were processed, hearings were held on the project, meetings were held with the neighborhood, and all of the normal things done that would occur prior to going to construction.”

The construction of Building II is not dependent on the construction of the Normandale Boulevard and 84<sup>th</sup> Street intersection improvement. The traffic analysis included in the EIS notes that improvement should be constructed regardless of the construction of the proposed office development project. Any potential environmental effects from the bridge would be studied during the required environmental reviews for the roadway improvements.

2) November 24, 2000 - Michael and Rebecca Maddox

Comment: The residents expressed the following concerns: 1) that the proposed Duke-Weeks project is being considered separately from the Normandale Boulevard grade separated project

over 84<sup>th</sup> Street; 2) traffic as well as speed will increase with the magnitude of the aforementioned developments; 3) a question regarding the 1% increase in volume stated in the Adequacy Statement; 4) a question regarding the statement made in the adequacy decision that the development will have “no discernable impact to wildlife” and that the area contains “no sensitive ecological resources, native prairie, colonial water bird nesting or rare plant communities”; and 5) the residents feel the City puts developer’s interests above its residents’ interests which was exemplified when the comment period on the adequacy decision was only extended seven days and the City contact for this project was out of town during a portion of that time and they requested a formalized public hearing.

Response: 1) Building II could be constructed without the construction of the Normandale Boulevard and 84<sup>th</sup> Street intersection improvement. Therefore the effects of the intersection improvement need to be evaluated prior to the approval of that project and not at this time. 2) The traffic analysis does project traffic to increase, however, the posted speed limit will remain the same for all roads in the area. 3) The increase in traffic volume along Nine Mile Creek Parkway is shown as 1% that is related to the proposed development and is based on the traffic modeling completed by BRW Consulting Group, Inc. The discussion on traffic modeling begins on page two of this memo. 4) The question in the Scoping EAW related to fish, wildlife and ecologically sensitive resources was answered as follows: The project site is currently developed with two office buildings and surface parking lots. The only natural habitat area on the site is the wetland/public water portion of the site. The proposed project will not result in the removal or alteration of any designated wetland or public water body. Existing habitat related to the wetland/public water area will be maintained with no loss of habitat function. Project related on-site stormwater management improvements would have a positive effect on surface water drainage to Nine Mile Creek in relation to the current situation in which drainage culverts discharge sediments and nutrients directly to the pond. There are no ecologically sensitive resources within the site boundaries. 5) The statement concerning the status of developers’ interests is the opinion of the resident. Other City staff members were available to answer questions regarding this project and the environmental process. Mr. Hawbaker’s e-mail was checked daily while he was out of town and written correspondence was distributed to other staff. An administrative hearing was conducted on December 11, 2000.

3) November 27, 2000 – Becky Logan, Pat Logan, Deb Kempf, Ross Kempf

### **Major Alternatives Considered**

Comment: How does the EIS address viable options to minimize the negative impacts? Why are other viable alternatives not considered in the FEIS?

Response: The Minnesota EQB rules require the EIS to compare the potentially significant impacts of the proposal with those of other reasonable alternatives to the proposed project, which includes the no-build alternative. The three alternatives considered include 1) the no-build alternative 2) construction of 989,246 square feet of office, a 95,500 square foot hotel and 3,814 parking spaces; 3) construction of 1,316,140 square feet of office, a 95,500 square foot hotel, and

5,318 parking spaces. The two build alternatives were analyzed and mitigation was offered for any potential effects identified.

Comment: Why should not the anticipated future market conditions be incorporated into the current proposed plan while changes can be made to the other buildings that would be in compliance with the EIS, comply with the interests of the developers, and address the concerns of the townhome owners?

Response: The purpose of the EIS is to consider the proposed development alternatives in relation to potential significant environmental effects. The modeling that is completed for the EIS is based on the highest intensity alternative. The placement and size of buildings is not covered in an EIS as it will be considered during the City's rezoning and development plan approval process.

Comment: Why does not the FEIS examine at least one alternative that would reduce the impact on the townhome owners who are significantly impacted by the scope of the current proposed project?

Response: The EIS process is designed to serve as a guide in project decisions and identify mitigation measures to control potential significant environmental effects. A project that is smaller in scale will have less effect on adjacent properties. When mitigation is necessary for the proposed alternative, the same mitigation, at a lesser degree would be required for a smaller project.

Comment: If not now, at what stage is it appropriate to work seriously on a compromise between the interests of Duke-Weeks and homeowners? How does the public have viable influence in the modification of a planned development project?

Response: Duke-Weeks has not filed a rezoning or planned development application for this project. Once an application is filed, neighbors adjacent to the proposed project will be notified and will be given the opportunity to voice their opinions, either through written comments or at the public meetings that will be held on the project for which the City received an application. City staff, the developer and the residents will look to the environmental record to assess potential environmental effects and mitigation measures needed to minimize those effects. Residents must remember, however, that the property owners have certain rights to develop and use their land under the existing zoning. This environmental review, and the mitigative responses, are required by the environmental review process.

Comment: Is the proposed plan actually for a 21 story building (Building IV with 14 office stories plus 7 parking levels under the office building), and two 14 story buildings (9 stories plus 5 parking levels under the office buildings)?

Response: The proposed plan does show Building IV as 21 total stories and Buildings II and III as 14 total stories. The shadow cast study took into consideration the proposed buildings.

### **Anticipated Visual Impact**

Comment: Why doesn't the EIS provide options to minimize the negative impact on homeowners directly across from the development, especially those across from Building IV? Have the guidelines or codes regarding parking ramp lights changed in the past few years?

Response: The EIS provides information on the extent of potential environmental effects related to the development alternatives identified. The guidelines for parking ramp lighting were changed in 1996. The proposed project will adhere to City Code lighting regulations. These regulations provide certain protection of residential properties from parking lot glare. There is nothing in the ordinance specific to parking ramp lighting.

### **Anticipated Traffic Impact**

Comment: What is the anticipated impact of the additional traffic due to this project on Norman Center Drive with the current roadways and with the possible elimination of Green Valley Drive, east of Norman Center Drive? What alternatives were explored for access to Building IV other than Norman Center Drive? How will the City of Bloomington work with other agencies to ensure that the necessary traffic changes are coordinated in a timely manner as the development proceeds – when without such changes this project will have a devastating impact on our area?

Response: The third lane project on I-494 is to include full access eastbound and westbound at East Bush Lake Road. The proposal includes moving Green Valley Drive south to accommodate improvements to the East Bush Lake Road interchange. The I-494 improvements are programmed for the 2003-2004 timeframe. Duke-Weeks has not filed an application for any building beyond the present Building I. Coordination with the various agencies will be done to the extent possible in relation to any building the developer has made application and received approval, should that occur.

The mitigation measures also include the installation of a signal at Norman Center Drive and Bridge Road prior to construction of Building II. The only way to provide internal circulation to Building IV would be to build a road through the pond, since it is in the center of the site. This would most likely not be allowed by regulatory agencies and would not be environmentally sensitive. This alternative for internal circulation was not considered feasible.

Comment: But, are not property values also affected by changes in the surrounding area and environment such as shadows 4 hours per day for close to half the year, the site of a 21 story building directly across from your home and living room window, and increased traffic and noise? Since the impacts addressed in the EIS will likely have an impact on property values, why aren't property values addressed at any time when alternatives to minimize the negative impact can be addressed in the EIS?

Response: The issue of property values is outside the scope of the EIS.

Comment: How does adding over 2000 parking spaces not affect traffic to some extent?

Response: The traffic analysis examined trip generation rates for the proposed development. The number of trips generated is based on the land use rather than the number of parking spaces. The number of trips generated by Buildings II during the peak hour does not affect the level of service in the area given the number of cars already present. The proportion of trips generated

by the proposal does not substantially affect the level of service. Note that this does not say “there will not be more traffic”, only that the roadway system has the capacity to handle the additional traffic without reducing the “level of service”.

**Mixed Use with a Mixed Focus Area**

Comment: Will the proposed office development reduce dependence on automobiles? Is there an ideal balance of office and residential development that is considered ideal by Bloomington or used to guide the development of mixed use areas? If so, what is that “mix” and how does the area affected by the proposed development compare? Please explain why rezoning is necessary to proceed with this project? What is the difference between high intensity office commercial zoning (CO-1) and the desired rezoning (planned development)?

Response: The City Council looks at the balance on a Citywide basis, not a neighborhood basis. The Council decided to create a balance between residential and office development when the Normandale Lake Condominium Tower was approved (which included a rezoning of the property to RO-24, Residential Office) and when the Normandale Lake Townhomes were approved (which also included a rezoning to RO-24, Residential Office). The opportunity is present for the workers in the office buildings to purchase residences in the area. Although the Planned Development process is not a part of the EIS process, the purpose of the Planned Development overlay district is to promote creative and efficient use of land by providing design flexibility in the application of the provisions of a primary zoning district (the CO-1, Commercial Office district). The provisions of the Planned Development Overlay District can be found in Section 19.38.01 of the City Code.

Comment: To what extent is the public used as a guide in general and in this specific Duke-Weeks proposal?

Response: The EIS is used as a guide for environmental considerations by the City Council, the project proposer and the public. After an application has been submitted for the project, the development review process will begin. The public will be invited to express their concerns, give comments and ask questions about the proposal. All information supplied, including public comments, will be considered by City Staff and the City Council during the decision-making process.

**Citizen E-mails**

November 17, 2000

4) Robert Elliott

Comment: The comments in the letter are about the level of traffic, safety and speed (especially by Poplar Bridge school) on 84<sup>th</sup> Street. The resident also states any traffic flow problems on I-494 are redirected to 84<sup>th</sup> Street. The letter also expresses a concern about response time given the congestion by emergency vehicles for the area.

Response:

As stated previously the traffic modeling for the area states the Norman Pointe Development would generate 78 trips in the AM peak hour and 75 trips in the PM peak hour using 84<sup>th</sup> Street east of Normandale Boulevard. (See response to No. 12). West 84<sup>th</sup> Street east of Stanley

Avenue has a lower average daily traffic volume than it did 15 years ago. If traffic respects emergency vehicles properly, response time should remain as what presently exists.

November 20, 2000

5) Dennis & Nancy Willis

Comment: The comment relates to public notification on this project.

Response: Project notification followed the Minnesota Environmental Quality Board (EQB) rules using the approved EQB distribution list. Public meetings were held during the scoping EAW, DEIS and FEIS. Additional meetings were held on Give Dates at the request of concerned residents. The City's consideration of the rezoning, preliminary planned development and final development plan requests, as listed on page 9 (Permits and Approvals) of the FEIS, will require additional notification to adjacent property owners. A public information meeting was held on December 11, 2000 to allow City Staff to provide information on the environmental review process and to answer any other citizen questions and concerns.

6) Al & Mary Jo Holmstrand

Comment: The correspondence states the residents would like to know about future development issues.

Response: Please see response to #5 above. In addition, the City's website is an excellent resource for development related information. The Bloomington Sun Current includes public notices about proposed projects and articles about developments.

7) Gerald & Delores Nelson

Comment: The letter states the residents do not want any more buildings in the 84<sup>th</sup> Street and Normandale Boulevard area. There should be a balance between development and the environment.

Response: The environmental review process is undertaken to determine the potential environmental effects of a project. The land use designations in the Comprehensive Plan for the area North of 86<sup>th</sup> Street and West of France Avenue are as follows: Residential is 33 percent of the land area, Commercial and Industrial (including office) is 30 percent and Public, Conservation and Quasi-Public constitutes 37 percent of the land area. Based on the above listed percentages, there seems to be a balance between land uses. The use of the land is not changing as it is designated for commercial use now and it will stay commercial.

8) Tania Ishaug

Comment: There currently is a traffic situation on Stanley Avenue at rush hour. The proposed project and turning Normandale/84<sup>th</sup> Street into a highway would only lead to increased traffic. The Highland area is a treasure – is it necessary to have a highway running through it?

Response: The traffic analysis in the EIS estimates the traffic that will be generated by the proposed project. The projections show there will be an increase in traffic, however only 5 percent of the newly generated traffic is expected to use 84<sup>th</sup> Street during the peak hour. The current alignment for Normandale Boulevard would be maintained for the grade separated intersection and would not be running through Hyland Park.

9) Cheryl Hillsdale

Comment: The resident is concerned about: 1) the erosion of property values; 2) increased traffic noise; 3) increased traffic and congestion; 4) environmental impact on Normandale Lake and Park and Hyland Park Reserve; and 5) the impact on city water and sewer resources. The resident also expressed a concern about adequate notification.

Response: 1) Property values, please see #3 above.

2) Please see the section, Construction of a Grade-Separated Intersection of Normandale Boulevard and 84<sup>th</sup> Street above.

3) Please see the section, Traffic Model Forecast for 84<sup>th</sup> Street above.

4)

5) Impact on city water and sewer resources – information contained in the EIS – the resources currently available are adequate for the proposed project.

Notification, please see #5 above

10) Arthur Rooze

Comment: The buildings currently under construction should be occupied before any additional buildings are contemplated so the traffic patterns can be fully evaluated.

Response: The traffic modeling completed by the BRW Consulting Group took into consideration the traffic generated by the Duke-Weeks office building that is nearing completion as well as the new 8000 Tower office building. As stated in the Adequacy Decision, construction of any new buildings on the site will be dependent on market conditions and available office space in the area. The project sponsor stated in the EIS that construction of a building is a large financial commitment and would not be undertaken without sufficient justification in the market place.

November 21, 2000

11) Kenneth Woodard

Comment: The resident would like to know how much development can take place without a change to the 84<sup>th</sup> Street and Normandale Boulevard intersection.

Response: Building II could be constructed without any modifications to the 84<sup>th</sup> Street/Normandale Boulevard intersection. Other suggested roadway mitigation measures associated with the office building is listed in the EIS.

November 25, 2000

12) Bruce Schmiedlin

Comment: The resident felt his concerns were not adequately addressed in the adequacy decision.

Response: The resident previously expressed concerns about development of the southern quadrants of the 84<sup>th</sup> Street and Normandale Boulevard intersection. The proposed project is in the Northwest quadrant of the intersection. There are no proposals to develop either of the two southern quadrants of the intersection.

The resident also previously expressed concerns about traffic on 84<sup>th</sup> Street. As stated in the adequacy decision, the actual amount of traffic traveling to the project site via 84<sup>th</sup> Street (from the east) would be approximately 5 percent: approximately 1 percent would enter 84<sup>th</sup> Street at Stanley Road, 1 percent would enter 84<sup>th</sup> Street from the south at France, 2 percent would enter 84<sup>th</sup> Street from the north at France and 1 percent would come from further east on 84<sup>th</sup> Street. The afternoon traffic flow distribution would be the same, but in the opposite direction. Only five percent of the traffic generated by the project would use 84<sup>th</sup> Street, which would be a minor contributor to the traffic that exists on 84<sup>th</sup> Street today.

November 27, 2000

13) Michelle Thorson

Comment: The resident has the following questions: 1) what other project variations were studied?; 2) the 78 and 75 additional cars moving East across Normandale during the peak hour, define the peak hour; 3) how much traffic is expected from the buildings that are currently under construction (Norman Center and the 8000 Tower)?; 4) with regard to the Eiffel Tower of Bloomington, how much traffic will that add and at what times of the day?; 5) the additional traffic expected during the road improvements to I-494 should be taken into account; 6) Have diversions to Bridge Road been plotted and what difference would that make to the actual number of cars passing Poplar Bridge Elementary- going the posted 30 m.p.h. and as local patrols have the responsibility for monitoring traffic, what are the plans for additional squads on our road?; 7) The resident has concerns about the Normandale overpass and the noise that will affect the neighborhood; 8) Arrangements for removal of deer carcasses; 9) Has the County resolved not to use salt on Normandale?; 10) Has Staff looked into economic projections for the next 10 years?

Response: 1) The Minnesota EQB rules require the EIS to compare the potentially significant impacts of the proposal with those of other reasonable alternative to the proposed project, which includes the no-build alternative. The three alternatives considered included 1) the no-build alternative 2) construction of 989,246 square feet of office, a 95,500 square foot hotel and 3,814 parking spaces; 3) construction of 1,316,140 square feet of office, a 95,500 square foot hotel, and 5,318 parking spaces. The two build alternatives were analyzed and mitigation was offered for any potential effects identified. In the traffic study 8 different scenarios were analyzed based on the assumptions that were made regarding roadway improvements. The new Figures show the proposed phases and the roadway improvements that are suggested to coincide with each phase.

2) The entire proposed Norman Pointe Office Development (four office buildings and one hotel) is estimated to generate approximately 78 trips in the AM peak hour and 75 trips in the PM peak hour on 84<sup>th</sup> Street (i.e. 5% of total trip generation from the development).

3) The traffic modeling completed by the BRW Consulting Group used a background traffic growth rate of approximately 3 percent per year. The growth rate was applied to the existing turning movement counts at the 11 study intersections between years 2000 and 2005. This rate was used to include additional trips from United Properties' new office building at 8331 Norman Center Drive.

4) Staff is not entirely clear about the resident's question, but assumes the resident is referring to the project proposal when questioning traffic from the "Eiffel Tower of Bloomington". The trips generated from the proposed project were estimated using the Institute of Transportation Engineers (ITE) trip generation manual and were included in the traffic analysis.

5) I-494 is to be under construction temporarily. It is assumed that any additional traffic that uses the local road system due to the highway construction will resume use of the regional system once the construction is completed.

6) At the present time, approximately 5000 cars use Bridge Road on a daily basis. The question regarding additional patrols is outside the scope of the EIS.

7) This was a comment/concern rather than a question.

8) The question regarding removal of deer carcasses is outside the scope of the EIS.

9) The question about the use of salt on Normandale Boulevard should be directed to the County.

10) The question regarding economic projections is outside the scope of the EIS.

November 28, 2000

14) Ken Woodard (twice)

First comment: The resident states that the Norman Pointe EIS is inadequate without an analysis of the noise from the freeway-style interchange at 84<sup>th</sup> Street and Normandale Boulevard which is required by the Norman Pointe development. It is improper to shift the impact analysis of noise related to Norman Pointe to a separate and later EIS for the freeway-style interchange.

Second comment: The resident states the Norman Pointe EIS is inadequate because it does not separately break out traffic capacity already funded for I-494 and East Bush Lake Road. It is impossible to know, without the traffic analysis, if the Norman Pointe development requires a freeway-style interchange at 84<sup>th</sup> Street and Normandale.

Response to both comments: The construction of Building II is not dependent on the construction of the overpass. The traffic analysis included in the EIS concludes the improvement should be constructed regardless of the construction of the proposed project. Any potential environmental effects from the bridge would be studied during the required environmental reviews.

November 28, 2000

15) Trudi Woodard

Comment: The resident does not think her concerns were adequately addressed in the Adequacy Decision document. The resident states the EIS is inadequate because it does not address the

following: 1) air pollution in the neighborhood south of 84<sup>th</sup> Street; 2) traffic – 3,850 parking spaces means more traffic and more pollution; and 3) traffic speed on Normandale will increase due to the freeway-like road which will make more noise and increase speeds on 84<sup>th</sup> Street as impatient workers try to get home. In addition, the resident asked “why not route office workers onto Bridge Road and utilize that to get on I-494?”

Response: 1) the DEIS does address the issue of air pollution in Section 4.4, Vehicle-Related Air Emissions. The analysis concludes that the 1-hour and 8-hour state ambient air standards for carbon monoxide (CO), which is the primary pollutant of concern, will not be exceeded.

Background CO concentrations were added to the predicted future concentrations based on levels derived from CO monitoring performed by MnDOT. The MnDOT monitoring site was located in the Poplar Bridge Elementary School, 8401 Palmer Avenue in Bloomington.

2) please see #3 above under Anticipated Traffic Impact.

3) At the present time, approximately 5000 cars use Bridge Road on a daily basis.