



MN&S FREIGHT RAIL STUDY

HENNEPIN COUNTY REGIONAL RAILROAD AUTHORITY AND THE
MINNESOTA DEPARTMENT OF TRANSPORTATION IN COOPERATION WITH THE CITY OF ST. LOUIS PARK

Meeting Notes

Freight Rail Study Project Management Team (PMT)

Meeting #6

February 24, 2011

PMT Members/Alternates Present

Birchwood Neighborhood, Karen Hroma	City of St. Louis Park, Kevin Locke
Brooklawns, Jake Spano	City of St. Louis Park, Meg McMonigal
Brookside Association, Tim Dunsworth	City of St. Louis Park (Planning Commission), Claudia Johnston
Blackstone Neighborhood, Chris Johnson	Hennepin County, Katie Walker
Eliot View, Doug Guild (Margaret Heil designated representative)	Hennepin County, Ia Xiong
Lake Forest Neighborhood, Lynne Carper	Mn/DOT, Timothy Spencer
Lenox, Jeremy Anderson	Mn/DOT, Dave Christianson
Lenox Alternate, Kandi Arries	Twin Cities and Western Railway, Bob Suko
Sorenson Neighborhood, Lois Zander	CP Railway, Amber Backhaus
Safety in the Park, Jami LaPray	Kimley-Horn and Associates, Jeanne Witzig
Safety in the Park, Thom Miller	St. Louis Park School Board, Rolf Peterson
Bronx Park, Kathryn Kotki	

PMT Members Not Present at Meeting

Cedarhurst Neighborhood, Kristi Rudelius- Palmer	South Oak Hill and Wolfe Park
Eliot, Marjorie Douville	
Elmwood, Eric Knudson	Triangle, Kristin Rohman Rehkamp



NOTE: THE MEETING SUMMARY REFERENCES THE DOCUMENTS PRESENTED/REVIEWED AT THE PMT MEETING. THE REFERENCED DOCUMENTS ARE ALL POSTED ON THE STUDY WEBSITE.

Welcome and Introductions

- Requested audience members to sign up for Open Forum discussion so that appropriate time can be allotted to speak at the end of the PMT meeting.
- Noted that meeting information will be available on the project website.
- Request was made to use the microphones during the meeting for taping clarity.
- Reviewed “we are here” roadmap; emphasizing focus of meeting to walk through preliminary railroad design concepts.
- Expressed that PMT is a working group, and there will be an Open Forum at the end of the meeting for audience questions.
- Noted two new PMT representatives, in response to the PMT’s desire to have representation from the business community – Curt Rahman from the Lake Street Business Area, and Bruce Hasselbring from the Oxford Street Business Area.
- Note change in representation for the Elmwood Neighborhood – Eric Knudson will replace Paula Evenson.
- The purpose of the meeting is to share info about the design, impact analysis, and potential mitigation measures.

Overview/Outreach

- Jeanne Witzig began the PowerPoint presentation by recapping the purpose of the MN&S study and the purpose of an Environmental Assessment Worksheet (EAW). The EAW is a disclosure document disclosing facts about a design alternative. It is not a document that approves or disapproves a project.
- Overview of process was given, highlighting an open house in the spring associated with release of the EAW, followed by a final PMT meeting.
- Shared that all comments received from PMT members on the design concept, from the December open house, and from the website were reviewed and common themes identified. Comments were considered when developing the revised design concepts.
- Referenced comment summary document provided in the PMT packet.
- Meg McMonigal, city of St. Louis Park, shared information about the business outreach meetings that were held February 8th and 9th, 2010. 13 property owners attended.

Walk Through of Modifications to Design Concept

- Mike Hermann of Kimley-Horn was introduced to share information about modifications to the design concept. He showed the original concept that showed proposed modifications to the south end of the project. Modifications are proposed to address comments, reduce

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impacts, and provide cost effective design. Each of the modifications were illustrated on the screen.

- Modified design reflects a flatter grade at the far south/west end of the alignment (previously 1.0%; now 0.86 %) to address request from railroad.
- Northbound connection from Canadian Pacific (CP) Bass Lake Spur to MN&S Spur realigned to reduce the footprint of impact.
- Direct southbound connection removed from original concept as it is not required to accommodate the easterly movement of freight. Modified design does not preclude the construction of a southern connection in the future. The current design does allow for future implementation of a direct southern connection.
- PMT comments/questions regarding the design modifications:
 - The MN State Freight and Passenger Rail Plan by Mn/DOT states the MN&S build-out would be \$40-70 million not including mitigation, yet we still don't have a cost estimate for this project. Open houses were held all over the state for the plan, but not in St. Louis Park. Is it possible that Hennepin County is deliberately misleading residents? **Response:** Cost estimates are part of this study, and they are not done yet.
 - Was LRT moved at all as part of this design? **Response:** No.
 - How much more earth need to be moved? **Response:** Not that much more than the initial design concept – the slope would be longer but gentler on a retaining wall.
 - Is 0.86% grade acceptable to the railroad uses? **Response:** We don't assume that, but this is as flat as we can make it without removing service to the existing Canadian Pacific (CP) industrial client.
 - TC&W has said several times that they want a southern leg – how will they go south? **Response:** They can continue to use the existing switching wye.
 - A PMT member noted it is the worst of both worlds to add more trains and keep the switching wye.
 - Why was the southern connection taken out? **Response:** It is not consistent with the definition of the study – the definition is to accommodate train traffic moving east, and that is what needs to be replaced.
 - Would cars be stored in the wye area? **Response:** Bob Suko of TC&W noted that the wye would have to remain intact, and yes, he assumes they would store cars on the existing siding.
 - Is the old curve vs. the new curve sharper? Can it really accommodate 25 mph on a 08.6% grade, with 80-100 car trains? **Response:** Curves are similar. The track works for 25 mph. Bob Suko - Making that grade is doable. A fully loaded train is unlikely to go 25 mph, but a 40-car train potentially could.
 - Is there an existing rail customer on the east side of Hwy 100? **Response:** (Bob Suko) No, no TC&W customers on the entire stretch of the Bass Lake Spur.
 - If TC&W needs to go south, are they are more apt to use the switching wye or go north to BNSF siding? **Response:** (Bob Suko) It would be easier to go north, but BNSF might not allow it.



Noise/Vibration Analysis

- Lance Meister from HMMH was introduced to present the results of the noise and vibration study:
 - Noise and vibration parameters, descriptors, impact criteria, and assumptions were presented. Assumptions represent a worst case scenario and projected impacts are compared to existing conditions in the corridor.
 - Field measurements were taken at 4 locations in the MN&S section for noise, and 2 locations for vibration. One of the noise monitoring locations was at the high school.
 - Noise analysis revealed severe impact at 327 residences, and moderate impact at 25 residences. Impacts are a result of increased number of trains (1 round trip per day to 3 round trips per day) and predominantly from the blowing of horns at grade crossings. Impact areas are grouped around existing grade crossings.
 - One building within 40 feet of the tracks is identified for vibration impact.
 - Most effective mitigation measure for noise impacts would be implementation of quiet zones.
 - Mitigation for vibration impact would need to be determined during design.
- PMT comments/questions regarding the noise and vibration analysis:
 - Heard that continuously welded tracks would not help at intersections, is this true? **Response:** No, continuously welded rail would help reduce the noise.
 - The assumption of 3 round trips per day isn't fair – it could be much more.
 - Were loaded vs. unloaded trains taken into consideration in the monitoring? **Response:** There were 3 days of monitoring completed, so whatever trains passed by in that timeframe are what the results are based on.
 - Are quiet zones based on vehicles and not pedestrians? **Response:** Dave Christianson – Quiet Zones must have measures to improve safety. FRA rules don't require a specific level of pedestrian mitigation; this would have to be requested by the city.
 - Are there other examples of tracks so close to a school and two blind crossings? **Response:** Dave Christianson – Burlington, Iowa. Train runs through downtown area and consistently runs at speeds of 25mph.
 - What is the length of trains studied? Does each rail car produce about the same amount of noise? **Response:** Yes, the length of trains was taken into account.
 - Question about wheel squeal? **Response:** The implementation of continuously welded rail will serve as mitigation to noise/vibration. Steel on steel does generate noise.
 - PMT members noted businesses along Lake Street – barber shop, palates studio, and dentists experience vibration today.
 - Some PMT members feel the noise and vibration study is inadequate.

Review of Impact Analysis Findings and Potential Mitigation

- Beth Kunkel of Kimley-Horn was introduced and reviewed impact findings related to wetlands, floodplains, and other natural resource impacts. The impact analysis at this point reflects worst-case scenario and impact numbers will likely decrease based on more detailed engineering.



- Jeanne Witzig reviewed impact findings related to community impacts, focusing on traffic and safety. Summary table was referenced in PMT package. Mitigation measures have been summarized that reflect a required action/measure to address a defined impact. Betterments have also been identified that while not a required measure, based on the impact analysis; they are proposed for consideration t.
- Traffic – referenced handouts in PMT packets. Maximum vehicle queue and intersection block times in peak hours were estimated based on frequency, length, and speed of trains. In a worst case scenario, a 120-car train traveling at 10mph could block up to 5 intersections.
- PMT members noted that “peak time” may not accurately reflect a worst case condition, i.e. when school is letting out. Also noted that the tables should reflect and consider the frequency of the trains each day. **Kimley-Horn will look at this and will follow up with the high school on parking lot counts and other traffic data.**
- PMT comments/questions regarding impact analysis findings/mitigation:
 - What are considered betterments? Would the community have to pay for these? Will there be more mitigation done if assumptions or analyses are found incorrect in the future? **Response:** Betterments are proposals/improvements that are not formally required to ensure the functionality of the proposed action/project or to mitigate it impacts but could be considered to enhance the proposed project/action and surrounding community. The funding source(s) for the betterments would be dependent upon the specific action. Relative to the future and potential impacts, the environmental analysis builds in worst case assumptions. If impacts are identified in the future, the agencies involved would need to address, as appropriate.
 - The only mitigation is quiet zones (which the city has to apply for) and a trail between two parks? **Response:** No, there are several other potential mitigation measures such as traffic warning signs on Hwy 7, pedestrian gates at grade crossings, potential design elements of retaining walls, and mitigation for property takes in the southern area of the corridor, among others (*refer to summary of impacts/potential mitigation measures and betterments handout*).
 - High school kids currently walk across the rail bridge over Hwy 7; acknowledge this is trespassing, but why not provide a parallel footbridge? **Response:** The defined impacts of the proposed project under evaluation in the EAW would not trigger the need for a parallel footbridge over Hwy 7.
 - Does the city have the power to reject mitigation? **Response from City Council members present:** The city agreed to accept a re-reroute of freight traffic to this corridor if there is no other feasible *alternative*, and if mitigation is found to be satisfactory.
 - Who makes the final decision on this project? **Response:** Katie Walker – The intent is to go through this process and if possible, make a consensus-based decision. It involves many entities, including private freight companies, FRA, Mn/DOT, Hennepin County, and the city. No one entity can unilaterally make a decision or stop an action.
 - Related to costs, Commissioner Dorfman has said this isn’t a done deal, but perhaps a decision has already been made by Mn/DOT, as based on the State Rail Plan? **Response: Dave Christianson** – costs in the state rail plan should be considered +/- 20% and are conceptual. They are not fully engineered, it is a ballpark figure. The plan does not decree that freight traffic will be moved to this area. It is conceptual.



- **Comment:** The State Rail Plan plans for an increase in rail traffic on MN&S.
Response: Dave Christianson - This is false. There are no projections on specific lines.
- In the traffic impacts, there is no reference to emergency vehicles and delay in response times due to intersection blocking. **Response:** As part of the evaluation for the EAW, coordination has taken place with the City of St. Louis Park fire chief regarding routes and potential impacts. The findings of the analysis will be included in the EAW (see page 8 of the MN&S Section - Environmental Summary Table dated 2/23/11, Public Services section provided as background information to PMT).
- Question for Dave Christianson – are there examples of other projects with no clear leadership or consensus? What happened? **Response:** Quiet zones are usually requested and paid for by a municipality. The exception may be a case like this, where there is demonstrated noise impact and quiet zone can serve as mitigation.
- **Question:** Will the proposed/potential design of the quiet zone improvements evaluate potential right of way impacts, specifically at the St. Louis Park High School? **Response:** Yes, the EAW will define both the impacts of the design under evaluation as well as the mitigation measures and recommended betterments.

Open Forum Discussion

Jeanne Witzig introduced the open forum discussion, indicating that in the interest of time, questions that require more detailed responses will be provided in writing following the PMT meeting.

All PMT meetings will include an Open Forum Discussion.

Seven individuals signed up to speak at the Open Forum. Responses noted below reflect responses provided at the PMT meeting, along with follow up responses to specific questions raised at the meeting.

- Brad Armstrong - 26th & Brunswick – **Question:** Questions were asked and sidetracked with no answer. Why can't you come up with cost? **Response:** The development of cost estimates is a part of this study; however the capital cost estimates are not done yet, and hence can not be provided at this meeting.
- Tom Johnson - licensed engineer and consultant - pinch point of 94 feet in corridor; he has been out there and measured. Wonders if the measurement is a physical measurement or a political measurement. **Response:** This comment refers to another corridor; our focus is on MN&S section.
- Comments: Message will be brought back that switching wye is not going away.
- **Question:** Where will the money come from for mitigation? **Response:** The cost for mitigation will be factored into the cost estimate prepared for this project. The specific funding source(s) have not been defined/confirmed at this time. It is assumed that funding could come from multiple sources, including potential federal dollars through the Federal Railroad Administration (FRA).



- Denise - Birchwood - background in urban design. **Question:** What is the cost of a complete full grade crossing at the high school? **Response:** A capital cost estimate for the complete full grade crossing at the high school has not been prepared to date, as it is not a part of the study definition, nor is it a mitigation measure recommended for further consideration, as there is not a defined need, and grade separation in this area would have substantial impacts to the character of the area, including direct right of way impacts. There would also be grade issues for the railroads.
- **Question:** There are delays of vehicles at grade crossings - why are the assumptions not the same as for sound and vibration analysis? **Response:** The noise and vibration analysis takes into account the existing condition of the study area; which reflects background noise, including the existing CP train on the MN&S (one round trip train per day). The future noise assumes the additional TC&W freight traffic. The noise and vibration analysis has taken into account existing noise conditions, the train lengths, speed, grade, estimated time of operations and number of locomotives. The delays represented in the traffic table reflect varying scenarios for comparative purposes relative to the delay at intersections as trains travel through the area. In other words, for the traffic analysis, the worst case would be a train traveling at 10 miles per hour through the corridor, as it would result in the longest closure time at a grade crossing. Under the noise and vibration analysis, the predominant noise source is the train horns blowing at the grade crossings. The worst case under noise and vibration is not directly related to speed, but rather a combination of factors. **Question:** Has the impact of closing 29th Street been evaluated? **Response:** The traffic analysis section of the EAW will address the impacts of closing 29th Street relative to traffic diversions. As noted in the MN&S Section – Environmental Summary table, 2/23/11, even if all traffic from the 29th Street crossing was diverted to the nearest crossing at 28th Street, there would be an increase of less than 10 percent in daily traffic on 28th Street, or about 10 to 15 vehicles in each of the peak hours. No adverse traffic impacts would be expected on 28th Street, including the 28th Street/Blackstone Avenue and 28th Street/Brunswick Avenue intersections.
- Comment/Question from PMT (Claudia Johnston and Thom Miller) – Comment that all community input has been disregarded in the process. **Question:** Did Kimley-Horn make decisions on their own? **Response:** The impact analysis presented at the PMT reflects a summary of the findings from the technical analysis completed to date for this study. Based on the preliminary findings of the impact analysis (as noted in summary tables this is a work in progress), mitigation measures that are required to address a specific impact are identified. Kimley-Horn has presented the findings and mitigation measures based on the technical analysis completed to date. Kimley-Horn is not the decision makers in the process, but rather the technical team members preparing the analysis and reports for the decision makers to review and use in their decision making process.
- Brian Zacheck - looking out for his family. **Question:** Why is the purchase of homes not on the mitigation list? **Response:** The Summary of Impacts/Potential Mitigation Measures and Betterments table (handout at the meeting) identifies mitigation measures relative to right of way. Firsts, avoidance/minimization of right of way impacts through design modifications. As noted earlier in the PMT presentation, right of way was a key element in modifying the design concept, most notably the



realignment of the track from the CP-Bass Lake spur to the MN&S spur (north connection). Even with the modification to the design, there will be direct property impacts to business properties in the Oxford area. North of Hwy 7, based on the current design, there would not be any additional direct property impacts. However, mitigation for this impact area could include the potential for additional acquisition of “unique” residential property outside of required existing right of way.

- Mary Hunt - many concerns - Frustrated as a citizen regarding the gaping holes in the study. A second opinion should be sought. **Question:** Was noise and vibration analysis not done on the BNSF line? There are vibration issues at night. **Response:** The noise and vibration analysis was completed for the MN&S section of the study area, as well as the proposed BNSF siding area (approximately 10,000 foot siding to the east of the existing MN&S line). Existing noise conditions were monitored at a site along the BNSF Wayzata Sub line. The findings from the BNSF section of the study area, relative to noise and vibration will be reported in the EAW. **Comment:** Feels like the study is being rammed through, April is too soon for the EAW. **Comment:** There is an elementary school on the BNSF line that has bad vibration. **Comment:** There needs to be more of an outreach effort to engage citizens.

- Sue Sanger – Comment: It appears Kimley-Horn gets to decide what's a major or minor problem and what needs to be dealt with. Define mitigation vs. betterment. Identify all criteria used to determine major vs. minor, with legal citations. **Response:** A discretionary state environmental assessment worksheet, or EAW is being prepared for the proposed MN&S Study. The EAW is a “brief document which is designed to set out the basic facts necessary to determine whether an EIS is required for the proposed project (part 4410.0200, subpart 24).” Its primary legal purpose is to provide the information needed to determine whether the project has the potential for significant environmental effects. Under the state environmental review process, the Responsible Governmental Unit or RGU is charged with reviewing the EAW prior to public distribution for accuracy and completeness. Following the public review of the EAW (30-day public review and comment period), the RGU makes a decision as to whether the proposed project requires the preparation of an EIS (positive declaration) or not (negative declaration). As presented in MN rule 4410.1700, Subpart 1, Standard on the need for EIS. An EIS shall be ordered for projects that have the potential for significant environmental effects. Subp. 6, Standard further states “in deciding whether a project has the potential for significant environmental effects the RGU shall compare the impacts that may be reasonably expected to occur from the project with the criteria in this part. “ The criteria are defined in Subp. 7, Criteria. In deciding whether a project has the potential for significant environmental effects, the following factors shall be considered:

- A. Type, extent and reversibility of environmental effects
- B. Cumulative potential effects of related or anticipated future projects;
- C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority; and
- D. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.



The RGU for the MN&S Freight Rail study is Mn/DOT.

Given the above, the role of Kimley-Horn is to conduct the impact analysis on the proposed project, as defined under the state environmental review program (Minnesota Administrative Rules Chapter 4410, parts 4410.0200 to 4410.7070) pursuant to Minnesota Statutes, section 116D.04 and 116D.045. The technical analysis completed will comply with the requirements set forth for the preparation of state EAW's, and as noted above will be reviewed by MN/DOT as the RGU. Kimley-Horn does not make decisions regarding the proposed project or the environmental determination, but rather as consultants we conduct the technical analysis, and report the findings within the EAW document for review by Mn/DOT and policy makers. Relative to the environmental review process, the key level of impact is "significance" versus major or minor (see criteria above).

The recommendations presented at the PMT meeting in February were based on the findings from the impact analysis and therefore represent technical based recommendations based directly on defined impacts. The recommendations do not reflect decisions, but rather a disclosure of potential measures to address defined impacts under the EAW review process.

As noted in a response to a question posed during the PMT discussion regarding the impacts and mitigation (see page 5 of meeting notes), the following is provided regarding the definition of betterments: Betterments are proposals/improvements that are not formally required to ensure the functionality of the proposed action/project or to mitigate its impacts but could be considered to enhance the proposed project/action and surrounding community.

- Mark Christenson: **Question:** Has this route been chosen? **Response:** No, the route has not been chosen. **Question:** When does the decision need to be made? When time runs out, does this become the default position? **Response:** Katie Walker: LRT will be constructed 2014-2017. Base assumption for LRT is freight traffic would need to be moved by 2013.
- **Comment:** The following areas have either been ignored or need further evaluation: property values, spills, and emergency response.

Summary of Action Items from PMT # 6

Action Item	Responsible Party	Timeline/Status
PMT #6		
Contact St. Louis Park High School regarding number of parking spaces, and school's peak traffic times.	Kimley-Horn	As Part of EAW Preparation



Attachment A: Others Present at Meeting

- | | |
|-----------------------|------------------------|
| Bill and Carol Donlon | Dale Stenseth |
| Terri Spencer | Julia DelCal [sp] |
| Jerry Vasquez | Rachel Noble |
| Rachel Callanan | Chad Hayenga |
| Nick Slade | Susan Feger |
| Bryan Hins | Raymond Ruer [sp] |
| Margaret Roy | Tylor Boland |
| Angela Berntsen | Jim Alexander |
| Dorothy Greyrck [sp] | Jake Spano |
| James C Greyrck[sp] | Art Higinbotham |
| Steven Stertch [sp] | Mike Daly |
| Velerie Bartel | Brad Armstrong |
| Brian Zacheck | |
| Cheryl Martin | George Beck |
| Kathryn McKeen | Gail Miller |
| Cleo Wedge | Duane Googins |
| Denise Zumm | Katy Carlson [sp] |
| Terry Freeman | Mary Hunt |
| Tom Cremont | Art and Betty Melchert |
| Britt Robson | Mark Christiansen |
| Mike Hough | Jocelyn Simon |
| Sandor Kiss | Richard Earle |
| Martin Green | Jim Mattison |
| Mary Topic | Jerry Lauser [sp] |





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MINNESOTA DEPARTMENT OF TRANSPORTATION IN COOPERATION WITH THE CITY OF ST. LOUIS PARK

Beth Kunkel, Kimley-Horn

Mike Hermann, Kimley-Horn

Michael Couse, AECOM

Joe Sutherland, AECOM

Lance Meister, HMMH



Attachment B: Clarification on Impact Methodology (in response to comments provided by PMT members following the meeting)

Following the PMT meeting on February 24, 2011, there were several follow up inquiries relative to the impact analyses for the study. Clarification on the points raised in correspondence is provided below for reference.

1. **Comment:** The LDN (measurement of sound) is calculated by noise over a 24 period as a baseline. So because trains are relatively infrequent within a 24 period, the total impact is thusly understated. In other words, if one hears train noise for 10 minutes a day now, it is only less than 1% of the day. If there are 10 more trains of equal length added that sound would exist in less than 7% of the total day. So while that is only an increase of 6 percentage points over 24 hours, it a 700% increase over today's noise. That's the real impact.

Response: Ldn is the standard noise metric used by numerous federal agencies for assessing the effects on noise. Study after study show that this metric is best at quantifying people's response to noise in their community, as opposed to other metrics such as Lmax. One of the reasons Ldn works well is that it takes into account how loud events are, how many of them there are, how long the events occur and when they occur (day or night). There is currently one round trip train per day, and its contribution to the overall noise is calculated and assessed the same way any other noise would be assessed. When we add in the additional trains, the Ldn goes up, based on the changes, including the number of trains, number of locomotives and cars, speeds, etc. Because our criteria are based on the existing noise and the change due to the project, this is all taken into account.

2. **Comment:** A key assumption listed by Hennepin County's analysis is flawed. The audio expert stated clearly- "today, the trains rarely blow their whistle at crossings". However, he then makes an assumption that in the future the trains will ALWAYS blow their horn at each crossing. Then, he states that a quiet zone could be APPLIED for in order to eliminate those horns. In other words, he assumes the worst case future scenario and implies that because that sound could be reduced, it's a big win. In fact, again, if you simply take today's noise and compare it to the potential noise due to this re-route, that impact is HUGE.

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Response: The noise analysis has assumed whistling/horn blowing in the future based on defined Federal Railroad Administration (FRA) rules. Hence, the analysis correctly includes the train horn blowing in the future. If the analysis had not included the train horns, the defined level of impact would not be accurately represented/disclosed. Quiet zones represent the most effective mitigation available. To the final sentence, the noise analysis compares the future noise to the existing. That comparative analysis is part of what the defined assessment methodology does. If the analysis were to compare the existing noise to the future noise without horns, the impact would be minimal, and in the "moderate" range, which does not require mitigation.

- 3. Comment:** Simple common sense. If the teachers at SLP High have to stop class today twice a day for a couple minutes due to train noise, those teachers will have to stop class much longer and much more frequently in tandem with the number and length of trains in the future. It's that simple.

Response: The noise analysis has taken into account existing noise levels at the St. Louis Park high school (monitoring location). The appropriate criteria will be applied to the school as part of the noise and vibration analysis and the findings fully reported in the EAW. The proposed continuously welded track, along with the quiet zone mitigation measures will substantially reduce the amount of noise at the school in the future.

- 4. Comment:** The vibration analysis presented at the last PMT meeting showed increased vibration is expected all along the freight rail reroute. The charts used for the evaluation were based upon vibrations produced by light rail trains that pass by in 10 seconds. What we need to evaluate is the impact of freight trains that take minutes to pass by while trying to climb a .86% grade. Federal vibration guidelines tell us that we need to use the "frequent events" column when evaluating freight trains. When we apply this standard, the predicted vibration level will exceed guidelines at almost every building along the freight rail re-route. This needs to be reevaluated immediately.

From the guidelines attached to this email:

"Although the impact thresholds given in Tables 8-1 and 8-2 are based upon experience with vibration from rail transit systems, they can be applied to freight train vibrations as well. A dual approach is recommended with separate consideration of the locomotive and rail car vibration. Because the locomotive vibration only lasts for a few seconds, the infrequent event



limit is appropriate. However, for a typical line-haul freight train where the rail car vibration lasts for several minutes, the frequent event limits should be applied to the rail car vibration."

Again, this matches our experience on this rail line. The vibration levels are excessive and drone on today, we cannot allow them to increase in both frequency and severity.

Response: The noise and vibration analysis conducted for the proposed project has been conducted in accordance with the Federal Transit Administration (FTA) guidelines, which have been adopted by the Federal Railroad Administration (FRA) for use on freight rail projects. The FTA criteria are based on the maximum vibration levels for an event and the number of times that event occurs.

The criteria for vibration is as shown in Table 1 (attached). For less than 30 events per day, the criterion is 80 VdB, for 30-70 events per day, the criterion is 75 VdB, and for 70+ events, the criterion is 72 VdB. The more events, the stricter the criterion is.

The guidance in the manual is geared toward long trains on main line service, those that are 5000 feet long or longer. On a project like the MN&S, the daily trains are shorter, and there are fewer trains (current and future) than on typical main lines. Aside from the less frequent unit trains, the rest of the trains are 50 or less cars, including the existing CP train (one round trip - which had 6 cars at the time of the on-site measurement). At that level, it's much harder to characterize the service under evaluation as "frequent," or defined "long trains" (per vibration analysis).

At 25 mph, the daily trains (up to 50 cars) will go by in 1.9 minutes or less. If the argument is that the longer trains will go much slower up the grade (or maybe down too for that matter), then the speed would be much lower, and the vibration levels would be much lower also.

Based on our (HMMH) experience and measurements at multiple locations, the vibration levels from locomotives are typically 5-8 dB higher than those generated by freight cars. If the analysis were to apply the "frequent" criteria to that at 72 VdB, with those lower levels, the distance to impact would be around 50-60 feet, which is slightly greater than what is being shown now. If the analysis were to use the "occasional" category at 75 VdB, the distance would be about the same as those being shown now. Based on the defined project, the "occasional" category has been assumed. Hence, if the criteria are best applied to 10 second events, then based on the train lengths and volumes on the MN&S, the project falls within the occasional range of 30 to 70 vibration events per day.



Finally, on the vibration topic, it is important to reflect the full context of the specific statements from the guidance. Specific to the quote referenced above, the following sentences are immediately after the quote: "Some judgment must be exercised to make sure that the approach is reasonable. For example, some spur rail lines carry very little rail traffic (sometimes only one train per week) or have short trains, in which case the criteria may be disregarded altogether."

5. **Comment:** The plan for the re-route moves the tracks up to 8 feet closer to residents on Blackstone Avenue. Was this taken into consideration?

Response: Yes. The noise and vibration analyses reflect the design concept presented to the PMT, which includes a shifting in the tracks

6. **Comment:** Noise and Vibration measurements fluctuate with different soil conditions and temperatures. Will measurements be taken in the summer?

Response: No. It is acknowledged that there is seasonal variation in vibration in areas where there is a predominance of what is defined as “efficient” soil types such as peat or clay. In the winter, the vibration levels for these soil types can be lower. For typical soil conditions, vibration levels do not experience seasonal fluctuations.

7. **Comment:** What about noise and vibration during construction? What will those levels be? Will any construction equipment be on private or commercial property?

Response: Construction noise and vibration will be addressed in the EAW. The EAW will also define assumed construction limits for the proposed project. If access to private property is needed during the construction period, the appropriate requirements will be strictly adhered to.

8. **Comment:** What are the long term effects? Will the increased vibration have an effect on homes 10, 20, 30 years in the future?

Response: The vibration levels projected at this time at the nearest residences are roughly two orders of magnitude below the damage criterion for fragile buildings. Vibration levels from activities inside the house, such as walking, slamming doors, climbing stairs, etc. create similar vibration levels within the building. Based on the findings from the vibration analysis, long-term damage is not anticipated.

9. **Comment:** The following issues should be further analyzed:

- Impacts to the adjoining streets – Minnetonka Blvd, Louisiana Avenue, 36th Street, Beltline Boulevard, Excelsior Boulevard are the major through streets that could be



impacted. In addition, the side streets within many of the adjoining neighborhoods will become a turnaround for vehicle traffic as drivers become frustrated with the congestion.

- Traffic impacts should be specific to the characteristics of the situation. There are two schools with traffic patterns that were not examined because the study was dedicated to typical 9 to 5 work commute patterns.
- There are traffic counts for vehicles only. There should be a traffic count for pedestrian and bicycle traffic to completely understand the impact to the other modes of transportation. This should include spring, summer season and football or other sport event patterns. The High School campus is divided by the tracks so this is a reasonable request.
- The School Board representative discussed how a quiet zone would impact access due to the necessary median designs – an issue not examined or considered prior to the meeting. All crossings need to be re-analyzed for impacts of the quiet zone medians to business and school access, residential driveways, and alley access.

Response: The traffic analysis will take into account the queuing of vehicles at grade crossings, and the potential impacts associated with that queueing. As noted in the meeting summary, Kimley-Horn will further coordinate with the High School relative to parking spaces and peak school times relative to the traffic analysis. The EAW will provide more information relative to pedestrian safety measures near the high school. Relative to the quiet zones, a preliminary evaluation will be conducted to assess the potential impacts to the immediate area(s) associated with the quiet zone design. The findings will be reported in the EAW.

10. Comment: A number of mitigation suggestions from SLP City Council and resident were left off the table. For example, the width of the right of way of the MN&S is one of the prime criteria for comparison of the Kenilworth and the MN&S routes in determining which one should continue to carry freight rail. The right of way of the MN&S has to be expanded to match that of the Kenilworth route. Kimley-Horn decided not to include that recommendation and others due to “their professional opinion”. This suggestion and others have to be put back on the table and costed out for future discussions. This is not a request – I believe these are show stopper requirements that have to be reinstated in order for future meetings to continue successfully.

Response: It is acknowledged that throughout the MN&S study process, there have been other suggested measures on the table for consideration in the process, including the expansion of the right of way to match that of the Kenilworth route. The proposed mitigation measures presented at the PMT meeting in February reflected preliminary recommendations



based on the findings of the impact analysis completed to date. The mitigation measures proposed reflected actions required to mitigate defined impacts resulting from the proposed action/project (relocating freight traffic to the MN&S line). The betterments reflect proposed measures that are not formally required to ensure the functionality of the proposed action/project or to mitigate its impacts, but proposed measures that could enhance the proposed project/action and surrounding community. The range of other measures proposed throughout the study process were considered when defining recommended mitigation measures for further consideration.

- 11. Comment:** The vibration and sound studies as presented are not complete. 1. Not enough samples were taken so that the study must be expanded to other areas along the route. 2. Criteria for determining vibration from freight traffic not light rail traffic has to be used- the study should be redone. 3. Additional sound and vibration studies should be done in the summer due to differences in weather conditions.

Response: Based on the study area conditions, proposed project description, and technical expertise, the number of measurements is considered reasonable to accurately assess the noise and vibration levels in the community. See notation under response to comment #4, that the FRA has adopted FTA Noise and Vibration guidelines for freight studies. Additional information on this topic is presented in a previous response, and will be further elaborated on in the EAW. See response to comment #6 as well regarding seasonal variation relative to vibration findings. For noise, there is no difference due to seasonal variations.

- 12. Comment:** The traffic study was not done with enough field work so the conclusions don't pass muster. It appears that the PM hours are not correct and the traffic outside of the bus traffic was not researched and counted accurately. Please redo this study.

Response: The traffic analysis used 24-hour traffic count data. Peak hours assumed in the traffic tables represent industry standards. The EAW will provide more detailed background information relative to the sources of traffic information, peak hour assumptions, and findings from coordination with the high school relative to their peak hours of operation.

- 13. Comment:** The southern interconnect is off the table. However, the Y is back on the table so is not going way. I imagine this will be a huge issue for the Elmwood neighborhood.

Response: Comment acknowledged.

- 14. Comment:** Resident PMT members are consistently cut short from commenting on ideas they think are important and the questions are diverted "for later in the meeting" instead of being answered directly and succinctly. This is disrespectful.

Response: Comment acknowledged.



15. Comment: Many consultants, too many assumptions. Why did Hennepin County not baseline assumptions for all consultants? I think the team/group assumptions don't match industry standards.

Response: The impact analysis completed for this study, as part of the state EAW process has followed accepted industry standards. Mn/DOT, as the Responsible Governmental Unit (RGU) reviews the findings of the analysis for accuracy and completeness prior to releasing the document for official public review and comment.

16. Comment: Hennepin County and Mn/DOT need to pay for ALL major/minor mitigation.

Response: Comment acknowledged.

17. Comment: Severe=Mitigation? The consultant set 80 db as their "severe" category. Who set 80 db? Another assumption or are there case studies to back up this number?

Response: The noise and vibration analysis conducted for the proposed project has been conducted in accordance with the Federal Transit Administration (FTA) guidelines, which have been adopted by the Federal Railroad Administration (FRA) for use on freight rail projects.

