

DRAFT Minneapolis Park and Recreation Board Southwest LRT DEIS Comment Letter

Current to: 26 November 2012

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DRAFT TRANSMITTAL LETTER

December 5, 2012

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: Minneapolis Park and Recreation Board Comments on the Southwest Transitway Draft Environmental Impact Statement

Dear Project Manager;

The Minneapolis Park and Recreation Board (MPRB) welcomes this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Southwest Transitway (SWLRT) project. In collaboration with its appointed Community Advisory Committee, the MPRB prepared the following comment letter for Segment A of the Locally Preferred Alignment (LPA) for the Southwest Transitway. It contains the MPRB's desired outcomes for the project relative to historical, cultural, visual, recreational, social, environmental, and safety impacts on the park and recreation resources it owns, manages and/or maintains.

In 1883, the Minneapolis Park and Recreation Board was created by an act of the Minnesota State Legislature and a vote of Minneapolis residents. It serves as an independently elected, semi-autonomous body responsible for governing, maintaining, and developing the Minneapolis park system. The MPRB's mission is as follows:

The MPRB shall permanently preserve, protect, maintain, improve, and enhance its natural resources, parkland, and recreational opportunities for current and future generations.

The MPRB exists to provide places and recreation opportunities for all people to gather, celebrate, contemplate, and engage in activities that promote health, well-being, community, and the environment.

The MPRB is also one of 10 regional park implementing agencies. It works with the Metropolitan Council to acquire and develop regional parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area. In 2011, based on Metropolitan Council annual use estimates, the regional parks and trails that are impacted by this alignment received over 6 million visits.

The MPRB is obligated to ensure that parks and trails, and the current and future interests of park and trail users are not substantially impaired by the project. It is within this context the MPRB makes the comments contained in this letter. There are three overarching messages the MPRB wishes to express regarding the Southwest Transitway:

- MPRB is supportive of light-rail transit;
- Current development and public use of the corridor within Minneapolis has an open and natural area character that includes portions of the Minneapolis Chain of Lakes Regional Park, Kenilworth Regional Trail and Cedar Lake Regional Trail. Park design in this area focuses on serenity, habitat restoration,

minimal development and passive recreation. Minimizing impacts to water table levels and quality, cultural landscapes, habitat and open space will be critical to retaining this area's character; and

- Several topics of keen interest to the MPRB, such as noise, vibration, and visual impacts, that the DEIS indicates will require further analysis during preliminary engineering. To monitor and protect the parks, trails and recreation areas of this project that are within its jurisdiction, the MPRB expects to have a central role in the design of Segment A.

Again, thank you for this opportunity to comment on the DEIS for the SWLRT. If you have any questions, please do not hesitate to contact Jennifer Ringold, Manager of Public Engagement and Citywide Planning, at 612-230-6464 or jringold@hotmail.com.

Sincerely,

John Erwin
Park Board President

Introduction

The Minneapolis Park and Recreation Board (MPRB), a semi-autonomous government agency, was established in 1883 by the Minnesota State Legislature. It owns, operates and/or maintains park land within the cities of Minneapolis, Golden Valley, Richfield, Robbinsdale, Saint Louis Park, and Saint Anthony. The MPRB is also one of 10 regional park implementing agencies that works with the Metropolitan Council to acquire and develop parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area.

In 2013, the Minneapolis Park and Recreation Board will celebrate 130 years of providing outstanding park and recreation services to residents and visitors of Minneapolis. In citywide surveys, residents often remark that the Minneapolis park system is essential to their quality of life and to the identity of the city. Founders of the system, such as H. W. S. Cleveland and Theodore Wirth, understood the role parks play in a healthy, livable, and balanced city. They made preserving land for future generations a priority. Their success shaped the character of Minneapolis and continues to improve people's lives.

Segment A of the Locally Preferred Alternative (LPA) of the Southwest Transitway (SWLRT) and its station areas include, cross, and is adjacent to neighborhood and regional parks and regional trails that are owned and/or maintained by the MPRB. These include the following:

- Minneapolis Chain of Lakes Regional Park
 - Cedar Lake
 - Lake of the Isles
 - Lake Calhoun
 - Cedar Lake Parkway and Trails (bicycle and pedestrian)
 - Dean Parkway and Trails
- Kenilworth Regional Trail (bicycle and pedestrian)
- Cedar Lake Regional Trail (bicycle and pedestrian)
- Park Siding Park

++ insert map showing and labeling these

With its extensive land holdings and maintenance responsibilities, the MPRB is obligated to identify the historical, cultural, visual, recreational, social, environmental, and safety issues and impacts related to Segment A of the LPA and ensure that these parks and trails, and the current and future interests of the of park and trail users are protected.

MPRB Community Advisory Committee

On 1 September 2010, the Minneapolis Park and Recreation Board approved the following charge for the appointed Community Advisory Committee (CAC):

Prepare recommendations to the Board on the contents of a formal Comment Letter in response to the Draft Environmental Impact Statement for the proposed Southwest Light Rail Transit Alternative 3A. The recommendations of the CAC shall focus on desired outcomes relative to historical, cultural, visual, recreational, social, environmental, and safety issues as they relate to lands owned or managed by the Minneapolis Park and Recreation Board.

Appointers and CAC members are below:

Appointing Person or Group	Appointee
----------------------------	-----------

Board President John Erwin	Scott Neiman, Chair
MPRB Commissioner Anita Tabb, District 4	Eric Sjoding
MPRB Commissioner Brad Bourn, District 6	Kendal Killian
MPRB Commissioner Annie Young, At-large	Caitlin Compton
MPRB Commissioner Bob Fine, At-large	Matt Perry
Bryn Mawr Neighborhood Association	Barry Schade
Cedar-Isles-Dean Neighborhood Association	John Erickson
Cedar Lake Park Association	Brian Willette
Kenwood Isles Area Association	Jeanette Colby
Lowry Hill Neighborhood Association	George Puzak
West Calhoun Neighborhood Council	Meg Forney
Harrison Neighborhood Association	Maren McDonell
Hennepin County Commissioner Dorfman	Tim Springer
Council Member Goodman – Ward 7	Neil Trembley
Council Member Tuthill – Ward 1	D'Ann Topoluk
Council Member Hodges – Ward 13	Ben Hecker
Council Member Samuels – Ward 5	Vicki Moore
Mayor of Minneapolis R.T. Rybak	Jerry Van Amerongen

Supported by MPRB staff lead Jennifer Ringold, the CAC began meeting in September 2010, suspended work for most of 2011 with the DEIS delays, and scheduled their 2012 meetings to coincide with the anticipated DEIS release. Working from comprehensive background information and their own knowledge and community connections, the CAC generated an increasingly detailed set of issues and preferred MPRB outcomes. Once the DEIS was released in October 2012, the CAC created a “crosswalk” connecting DEIS contents with their issues and outcomes, which was then converted to this Comment Letter. The final version was then formally approved by the MPRB Board on ++XXXX.

Comment Letter Structure

The content of this comment letter is organized by location from ++southwest to northeast as shown in the Table of Contents and on the [map](#) below of all locations addressed.

The first section presents MPRB’s adopted opposition to the co-location alternative.

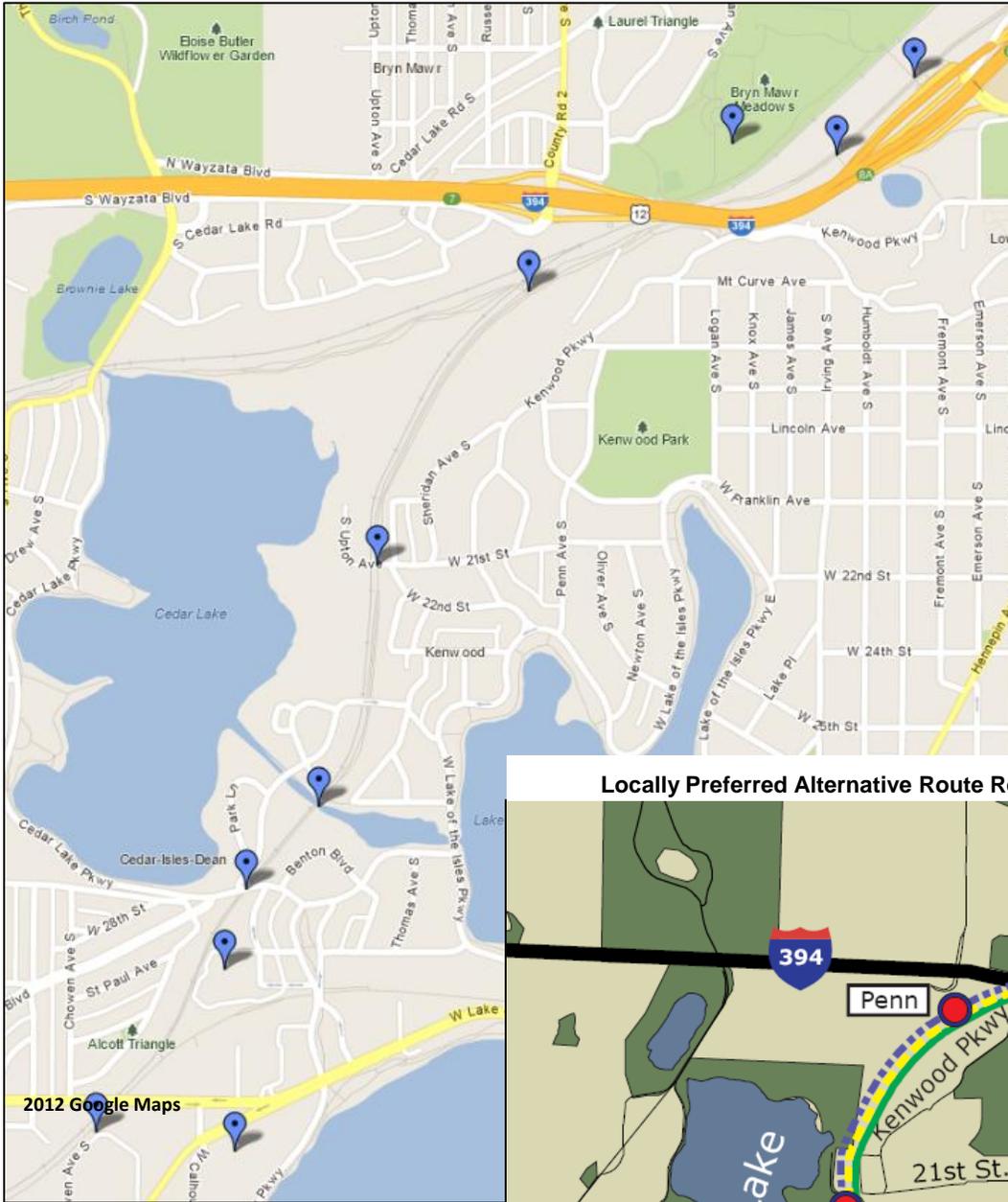
Each of the primary content sections following that includes the following:

- **Location and Description:** This describes the location and why it was selected by the MPRB for comments on the DEIS.
- **Issues:** Each includes a description of the issue and why it is critical for that location. For each issue, the MPRB then provides one or more of the following:
 - Outcomes: Critical *outcomes* that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.
 - Statements: MPRB’s adopted positions on critical issues or processes that must be resolved, reconciled, reevaluated, or otherwise included in near-term design and decision-making work.
 - Corrections: Identified errors in the DEIS that must be corrected for the FEIS and subsequent work.

Images are courtesy of MPRB unless otherwise noted; specifically, most aerials and maps are from Google and current to 2012, and are cited.

Corridor and Comment Location Maps

Locations Addressed in This Comment Letter



Locally Preferred Alternative Route Relevant to MPRB



Co-Location Alternative

According to the Section 4(f) review of the co-location alternative in the DEIS, this alternative will result in permanent loss of park land. In addition, it will provide design limitations that will make it difficult to restore the bicycle and pedestrian trails to current widths and to mitigate impacts to properties that are within the Grand Rounds Historic District that is eligible for the National Register of Historic Places.

Below is the statement that the MPRB has adopted regarding co-location that must be addressed in the FEIS and preliminary engineering.

Statement: The MPRB opposes the co-location alternative and supports the findings presented in the DEIS regarding Section 4(f) impacts for the co-location alternative. In review of the documents, the loss of park land described for the co-location alternative cannot be mitigated within the corridor.

1 Entire Corridor

1.1 Location and Description

This section includes issues and outcomes that apply to all or most of the corridor. The sections that follow this focus on issues and outcomes that are specific to certain locations. See [maps](#) above.

1.2 Issue: Section 4(f) analysis

A primary concern for the MPRB is protecting park land and recreational opportunities within and adjacent to the corridor for current and future generations. Chapter 7 of the DEIS contains the Section 4(f) evaluation of the project. It identifies potential permanent use, temporary use, and constructive use of park land for the project. For Segment A of the LPA it shows that .016 acres may be a potential temporary use and does not identify any potential permanent or constructive uses.

Permanent and Temporary use: Within an urban setting continuous park land and linear corridors are critical to habitat management and connectivity for park users. According to the *LRT Alternative Segment Plan and Profile STA: 972+00 - 1023+00* preliminary concepts (area near 21st Street) in Appendix F (**++ add map**), additional park land may be needed to accommodate the westernmost LRT track. The analysis of park lands that are covered by Section 4(f) regulations in the DEIS does account for this land.



Constructive use: The DEIS articulates that “use” of a Section 4(f) resource occurs when, among other things, (7.1) “There is no permanent incorporation of land, but the proximity of a transportation facility results in impacts so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired (e.g., ‘constructive use’).” Based on this definition, the MPRB anticipates that park land and park users may experience long-term impacts of the SWLRT due to noise, vibration, visual impacts, and safety. Park lands that are eligible for the National Register of Historic Places are considered especially vulnerable to these impacts. Depending on final design, these impacts may be so severe that they would constitute a *constructive use* of protected properties under Section 4(f) regulations.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.2.1 **Statement:** Park lands near 21st Street that are shown as being used for the LRT track in the conceptual designs must be reevaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.2 **Statement:** As the design progresses, park lands must be evaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.3 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term noise, vibration, and visual impacts.
- 1.2.4 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term impacts on parks that are considered eligible for the National Register of Historic Places.

1.2.5 **Outcome:** Park land along the corridor is preserved in the same or better condition.

1.2.6 **Outcome:** Park property is not used permanently as part of LRT development.

1.3 Issue: Design character

Aside from Park Siding Park, the park land the MPRB owns, manages and maintains adjacent to the corridor is classified as a regional park. A regional park according to the Metropolitan Council's 2030 Regional Parks Policy Plan is "area of natural or ornamental quality for nature-oriented outdoor recreation such as picnicking, boating, fishing, swimming, camping and trail uses." Park Siding is considered a neighborhood park by the MPRB which means it is a block or less in size and provides basic facilities within a neighborhood.

The MPRB recognizes that current development and public use of the corridor within Minneapolis from the St. Louis Park boundary to the Penn Station has an open and natural area character that includes portions of the Minneapolis Chain of Lakes Regional Park. Portions of this area are within the Grand Rounds Historic District that is eligible for the National Register of Historic Places and are included within an Audubon International's Important Bird Area. Park design in this area focuses on serenity, habitat restoration, minimal development and passive recreation. Minimizing impacts to water table levels and quality, cultural landscapes, habitat and open space will be critical to retaining this area's character. LRT and station area design that is sensitive to these issues is critical to protecting the activities, features and attributes of the adjacent park land in this corridor.

The DEIS makes several references to this issue, including the following:

- 4.1.3.6 Groundwater Sensitivity, page 4-19: Several areas in the study area lie within zones of very high sensitivity to pollution of the water table system...Portions of the land between Cedar Lake and Lake of the Isles....
- 4.1.4.2 Groundwater, page 4-21: The Build Alternatives may have long-term impacts on groundwater if a permanent water removal system (dewatering) is required. Permanent water removal is anticipated where the cut extends below the water table. There is a probable need for permanent water removal at one cut on both Segment 1 and Segment 3, and possible needs on Segment A and at a second cut along Segment 3, because of shallow groundwater. Evaluations and associated impacts of permanent water removal at the major excavations are summarized in Appendix H.
- 4.3.3.1 Riparian Habitat Areas, page 4-50: The LRT 3A (LPA) passes over several riparian areas that are associated with purgatory Creek, South Fork Nine Mile Creek, Nine Mile Creek, Minnehaha Creek and the unnamed channel [Kenilworth Channel] between Lake of the Isles and Cedar Lake. The alternative would impact native wetland or riparian habitats, which are typified by non-native woody wetland habitat, non-native emergent wetland habitat or open water habitat (MLCCS 2008). The development of linear ROW along portions of this alignment has fragmented many wetland habitats on both sides of these features. Development of this alternative would likely increase the fragmented nature of wetland and riparian habitats.
- 3.1.2.4, page 3-16: Northwest of Lake Calhoun and between Cedar Lake and Lake of the Isles the city has established the Shoreland Overlay District that specifies development guidelines within a half-mile radius around each of these lakes. Although the ordinance does not prohibit transportation uses or facilities, it does specify guidelines for controlling both point source and non-point source pollutant discharge within the Shoreland Overlay District.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.3.1 **Outcome:** Minneapolis Chain of Lakes Regional Park and adjoining park land remains a quiet, tranquil, and natural park destination.

1.3.2 **Outcome:** The area between Burnham Road and 21st Street is naturally beautiful and serene.

- 1.3.3 **Outcome:** Natural wildlife habitat and serenity of the trail and park land are maintained.
- 1.3.4 **Outcome:** Any permanent dewatering methodologies applied to the corridor protect water table levels and quality, and habitat dependent on those water levels within the park lands.
- 1.3.5 **Outcome:** Stormwater is managed and no additional water load is added to water bodies within the Minneapolis Park system.
- 1.3.6 **Outcome:** The Chapter 551, Article VI Shoreland Overlay District of the City of Minneapolis' Code of Ordinances is followed to preserve and enhance the environmental qualities of surface waters and the natural and economic values of shoreland areas within the city.

1.4 Issue: Trail access, use, and maintenance

The Minneapolis Park and Recreation Board owns or maintains trails that are within or cross the LPA Segment A corridor. The MPRB is concerned that the SWLRT will impact these trails by reducing trail width, adding time delays, making them more difficult to maintain year-round, and introducing safety concerns. These impacts are anticipated due to the frequency at which trains will travel on the tracks and the potential reduction in access to the trail from local neighborhoods and park lands.

Based on the conceptual design drawings notation on page 5 of Appendix F, the MPRB is concerned that the full cost of replacing and resurfacing federally funded trails will not be included in the project budget of the SWLRT.

The DEIS makes several references to the importance of retaining the trails. It also mentions the anticipated increased use that will result from population increases and transit development. The references include:

- 3.2.2.6 Neighborhoods and community cohesion, page 3-58: The implementation of LRT service would not sever roadway or driveway connection or remove the existing multiple-use trail adjacent to the proposed guideway alignment of Segment A...
- 10.5.3.1 Improved Multimodal Environment, page 10-18: Transitway project will improve the existing pedestrian and bicycle infrastructure along the alignment, and improve the safety of pedestrians and bicyclists through implemented design guidelines. All pedestrian facilities will be designed in accordance with current design standards and Americans with Disabilities Act (ADA) requirements to ensure access and mobility for all.
- 9.6.6.3 Anticipated cumulative impacts, page 9-23: With or without the Southwest Transitway project, urbanization and population densification in general will increase the use of parks within the Southwest Transitway study area and the region. More demand on parks and recreation facilities is unavoidable. ... The Southwest Transitway's proposed stations...will be part of this trend. ...the existing parks are likely to become more crowded and intensely used.
- Appendix F, Legend for Plan: The grading for the trails shown will be included in the project cost, however the surfacing for the trails will not be included with the project costs. Trail surfacing must be performed at the expense of others.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.4.1 **Statement:** As the implementing agency of regional parks and trails in the City of Minneapolis, the MPRB insists that the full cost reconstructing and resurfacing trails that are impacted by the project are included in the project budget.
- 1.4.2 **Outcome:** There is adequate access to the Kenilworth Regional Trail from both sides of the LRT tracks, and access points are a reasonable walking distance apart.
- 1.4.3 **Outcome:** Bike and pedestrian trails remain with the same or better design quality and width as current trails; these include those that run along and across the corridor, as well as access trails.

- 1.4.4 **Outcome:** The trail design meets the needs of current and projected users and is designed for a 20 mph design speed.
- 1.4.5 **Outcome:** Bicycle and walking trail users have a positive, linear park-like experience, including being free of obstructions, having a 2-foot or greater buffer on each side of all trails, and retaining a sense of connection to open space.
- 1.4.6 **Outcome:** All trail connections are maintained or improved.
- 1.4.7 **Outcome:** At all points along the corridor, and especially at the narrowest locations, sufficient space remains for trails, trail users and year-round maintenance vehicles and crews.

1.5 Issue: Noise and Vibration

The Minneapolis Park and Recreation Board is concerned about the LRT noise and vibration impacts on park lands and park and trail users due to the high number of trains that will travel through the corridor daily. An increase from a few freight trains per day to hundreds of LRT trails will dramatically increase the amount of time park and trail users are exposed to noise and vibration. This could substantially diminish the park and recreation experience for park and trail users.

For noise, the MPRB is particularly concerned that park lands in the corridor are erroneously classified as a Category 3 land use. In FTA's land use categories for Transit Noise Impact Criteria, Category 3 is most commonly associated with institutional land uses and can be used for some types of parks. By contrast, Category 1 is for tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use. Category 1 is more closely aligned with the regional park classification that applies to the majority of park land in the area.

The DEIS makes several references to this issue, including the following:

- 4.7.3.5 Assessment, page 4-92: There is one moderate impact to a Category 3 land use. The impact is due to very low ambient background noise levels found in the walking trails of the Cedar Lake portion of the Minneapolis Chain of Lakes Regional Park combined with close proximity to the tracks and bell use at grade crossings and crosswalks. This may not apply to the entire Cedar Lake portion of the park, especially in areas where park-goers themselves create higher noise levels, and area of the park farther from the tracks.
- 4.8.6 Mitigation: Detailed vibration analyses will be conducted during the Final EIS in coordination with Preliminary Engineering. The Detailed Vibration Assessment may include performing vibration propagation measurements. These detailed assessments during the Final EIS/preliminary engineering phase have more potential to reduce project-related effects than assessments of mitigation options at the conceptual engineering phase of the project. Potential mitigation measures may include maintenance, planning and design of special trackwork, vehicle specifications, and special track support systems such as resilient fasteners, ballast mats, resiliently supported ties, and floating slabs.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.5.1 **Statement:** Category 1 is most consistent with the type of parks and opens space the MPRB owns or maintains adjacent to or within the corridor. Noise impacts on park lands and users must be reevaluated under the standards set for Category 1 land uses.
- 1.5.2 **Outcome:** The vibration impacts are minimized for park and trail users.
- 1.5.3 **Outcome:** The noise impacts are minimized for users of parks and trail and park users and do not exceed the noise standards set for Category 1 in adjacent park land and along the trail.
- 1.5.4 **Outcome:** New technologies that reduce track noise are evaluated and incorporated when they will

produce a positive result for park and trail users.

1.5.5 **Correction:** In 4.7.3.5 page 4-92, it appears that Segment 4 is referenced instead of Segment A.

1.6 Issue: Visual appeal

The Minneapolis Park and Recreation Board is concerned about the impacts on park land, and park and trail users by visual impacts of the SWLRT. These concerns include the impacts on view sheds within and outside of the parks, especially those that are part of the Grand Rounds Historic District, which is eligible for listing on the National Register of Historic Places.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.6.1 **Outcome:** The visual impact of the LRT and related infrastructure is minimized for trail and park users and honors the historic character of the Grand Rounds when it is near Cedar Lake Parkway and the Kenilworth Channel.

1.6.2 **Outcome:** The train lights have minimal visual impacts on trail users.

1.7 Issue: Safety

Safety of park and trail users is a critical objective for the Minneapolis Park and Recreation Board. This includes using design to reduce risks from user conflicts or unexpected hazards, and ensuring adequate access to park facilities when the SWLRT is in operation. Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.7.1 **Outcome:** All trail users can safely use the trails. +++ Is this design such as ADA?

1.7.2 **Outcome:** Adequate fire safety infrastructure exists within or proximate to the corridor such that fire suppression and response times meet relevant laws and standards.

1.7.3 **Outcome:** Fire, police, and emergency medical personnel and equipment are able to access park lands adjacent to the corridor and provide response times that meet relevant laws and standards.

1.7.4 **Correction:** The Minneapolis Park Police should be included in the references to police agencies related to the corridor.

1.8 Issue: Construction

The Minneapolis Park and Recreation Board (MRPB) recognizes that Minneapolis has become one of the top bicycling communities in the country. As such, trail users rely on high quality trail facilities year round for recreation and commuting. A detour that requires significant re-routing of trail users or an extended closure of a trail will be a barrier to trail users on the western side of Minneapolis and the metro area.

Construction can result in extensive damage vegetation and trees through removals and introduction of invasive species. The former results in a diminished quality of the park and recreation experience for trail and park users, the later results in long-term habitat management issues for MPRB staff. Additionally, construction can result in the altering the ground and surface water levels and quality if BMP are not implemented.

The DEIS makes several references to this issue, including the following:

- 6.3.3.1 page 6-60: Short-term construction effects to bicyclists and pedestrians are also anticipated in all Build Alternatives. In Segments 1, 4, A, and C, some disruptions to the existing regional trails are anticipated during construction. The extent to which the trails would be available for use throughout the process of relocation will be determined during Preliminary Engineering. Disruptions to the existing sidewalk network are anticipated in all Build Alternatives.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.8.1 **Outcome:** Surface and groundwater quality is protected during construction.
- 1.8.2 **Outcome:** Reasonable and safe alternative routes are provided for trail users when sections are closed during construction.
- 1.8.3 **Outcome:** Any flora that is lost to construction or LRT use is replaced with flora that is in accordance with MPRB plans, with monitoring through a plant survey and replacement for 5 years after construction is complete.
- 1.8.4 **Outcome:** Soils and slopes are stabilized during construction.
- 1.8.5 **Outcome:** Construction dewatering protects water table levels and habitat within park lands that is dependent on those water levels.
- 1.8.6 **Outcome:** Construction practices prevent introduction of invasive species to park lands.

2 Trail Access at Abbott Avenue S (by new West Lake Station)

2.1 Description and MPRB Interest

This actively used trail access to the Kenilworth Regional Trail and Midtown Greenway is currently the closest access point for users of the proposed West Lake station. It is also approximately 1/3 mile from the heavily visited Lake Calhoun and associated MPRB park lands. West Calhoun Neighborhood Association added park-like features including a kiosk, picnic table, bike racks, decorative fencing, and a drinking fountain.



2.2 Issue: Park and trail access

The MPRB is committed to preserving this important trail access, ensuring safe and convenient wayfinding between the trail and nearby Lake Calhoun, and advocating for sufficient bicycle parking for all visitors to the area.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 2.2.1 **Outcome:** West Lake station users and all other users have safe and convenient access to and from Lake Calhoun and the Kenilworth Regional Trail.
- 2.2.2 **Outcome:** Wayfinding is provided between the West Lake station and Lake Calhoun and the trails.
- 2.2.3 **Outcome:** Safe and adequate bike parking is provided for recreational and commuter users of the trail and for Lake Calhoun visitors.



3 Northwest Corner of Lake Calhoun Area

3.1 Location and Description

The Calhoun Executive Center parking lot next to Lake Calhoun sits on land that is partially owned by the Minneapolis Park and Recreation Board as part of the Minneapolis Chain of Lakes Regional Park – which has an estimated million visits each year. Lake Calhoun is the largest lake in this regional park, and the surrounding parkway is a key segment of the Grand Rounds Historic District that is eligible for the National Register of Historic Places.



This location within the Minneapolis Chain of Lakes Regional Park is the closest major park land to the proposed West Lake station. On weekends and weekday evenings, visitors use this area for parking and to access the regional park and the Grand Rounds. Traffic patterns that will be impacted by the SWLRT station at West Lake will include direct impacts to the motorized and non-motorized traffic at Lake Calhoun Parkway and Dean Parkway.

3.2 Issue: Park and trail access

The hundreds of thousands of visitors who use this area to access Lake Calhoun, the historic Grand Rounds parkways and trails, and the Minneapolis Chain of Lakes Regional Park come on foot, bicycle, motorized vehicle, and in the future from the LRT. The MPRB is concerned that the introduction of the high-volume West Lake station increases the complexity of this area, and is committed to ensuring that all visitors have a positive, easy, and safe experiencing accessing and using the park lands and trails in this area.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 3.2.1 **Outcome:** LRT and West Lake station area design decisions for this area are based on design recommendations from a comprehensive and multimodal (bicycle, pedestrian, transit, vehicle) circulation analysis that addresses impacts to the Grand Rounds parkways and trails.
- 3.2.2 **Outcome:** The design of this area makes clear that it is a “gateway” to the Minneapolis park system.
- 3.2.3 **Outcome:** A safe, free-flowing pedestrian and bicycle route with exceptional wayfinding exists between the LRT station area and Lake Calhoun and adjacent park land.
- 3.2.4 **Outcome:** There is no loss of parking for park and trail users.
- 3.2.5 **Outcome:** Greenspace at the northwest corner of Lake Calhoun is preserved for park visitors and recreational purposes.

4 Park Siding Park

4.1 Location and Description

The MPRB owns Park Siding Park, a small neighborhood park, which is immediately adjacent to the LRT corridor and an access point to the Kenilworth Regional Trail. With play equipment as well as formal gardens, it is actively used by children and adults from neighborhoods on both sides of the corridor.

4.2 Issue: Access and safety

Although the DEIS commits to improving the pedestrian and bicycle infrastructure along the alignment and improving the safety of pedestrians and bicyclists through implemented design guidelines (10.5.3.1), the MPRB has particular access and safety concerns at this location. Park visitors, including small children, come from both sides of the corridor as well as from the Kenilworth Regional Trail. This is also a popular bicycle and pedestrian trail ingress and egress point.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.2.1 **Outcome:** All users have formal and safe access to the park from both sides of the LRT.
- 4.2.2 **Outcome:** As an important trail access point, the trail design accommodates a safe ingress and egress.
- 4.2.3 **Outcome:** Trail users have safe access to and from the park.

4.3 Issue: Visual appeal

This small neighborhood park provides play equipment for children and formal gardens for adults. The heavily planted berm between Dean Court and the Kenilworth Regional Trail currently provides a visual screen, but the MPRB is concerned with ensuring that during and after construction there is a strong visual barrier that remains compatible with this important neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

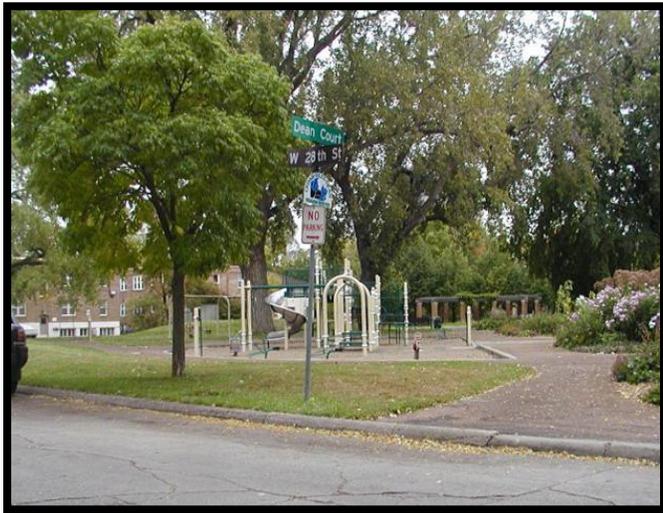
- 4.3.1 **Outcome:** The LRT's visual impact does not disrupt park visitors' enjoyment, nor detract from the park's character.

4.4 Issue: Noise

The MPRB is deeply concerned about the impact of LRT noise on Park Siding visitors, especially the very young children who frequent this neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

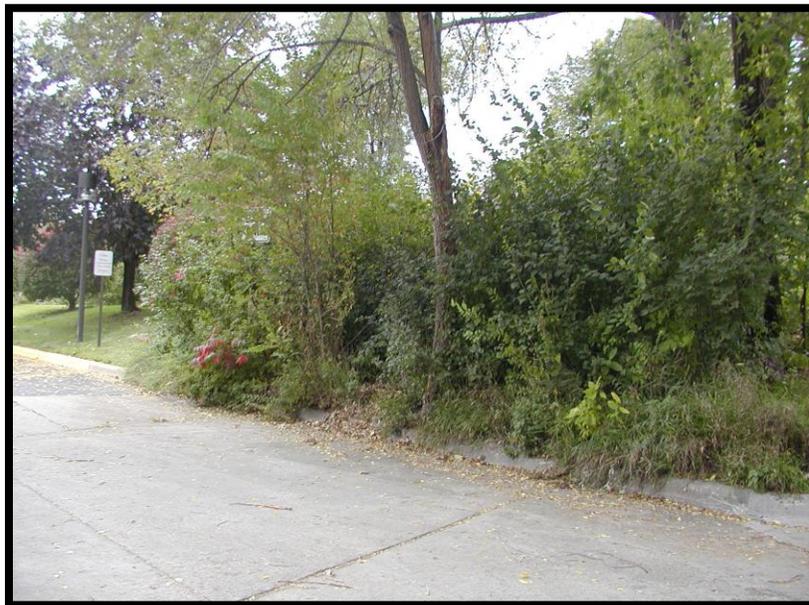
- 4.4.1 **Outcome:** Park users, especially young children, are not subject to LRT noise levels that exceed the noise standards set for Category 1 land uses.



Park, looking SE from Kenilworth Regional Trail access



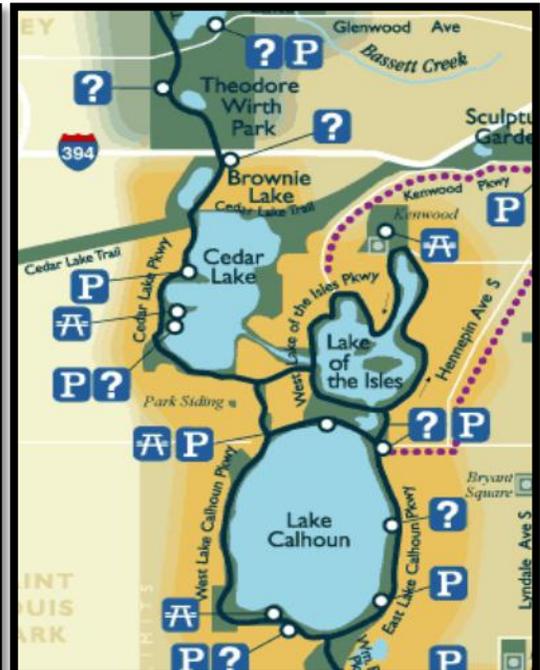
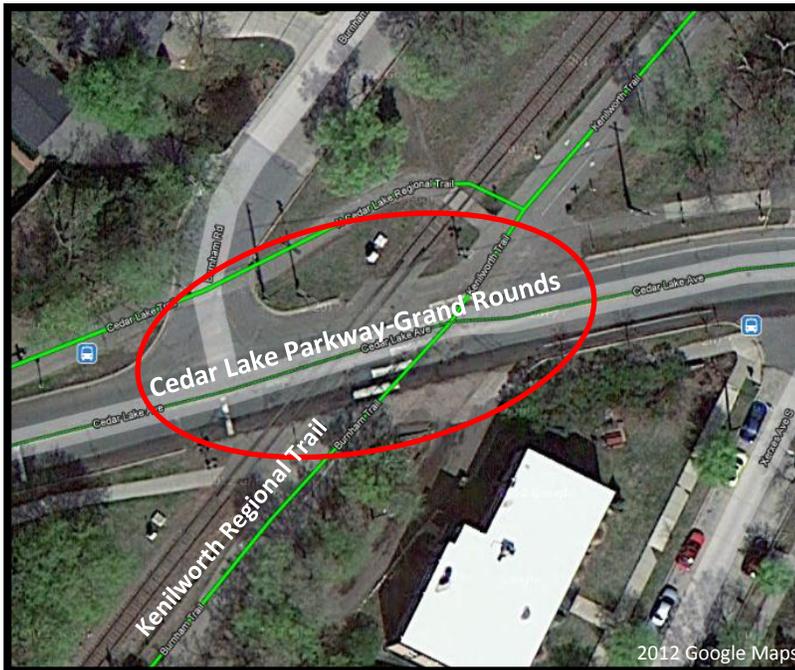
Kenilworth Regional Trail access, looking toward corridor



A heavily landscaped berm between Dean Court and the corridor provides a safety and visual barrier for Park Siding users

5 Cedar Lake Parkway-Grand Rounds

5.1 Location and Description



Cedar Lake Section of Grand Rounds

At this location the LRT intersects with actively used Cedar Lake Parkway, which is an essential section of the [Grand Rounds National Scenic Byway](#) (see Grand Rounds map) and within the Minneapolis Chain of Lakes Regional Park (Cedar Lake Beach, Parkway, and Trail). Directly to the west of this location is Cedar Lake South Beach.

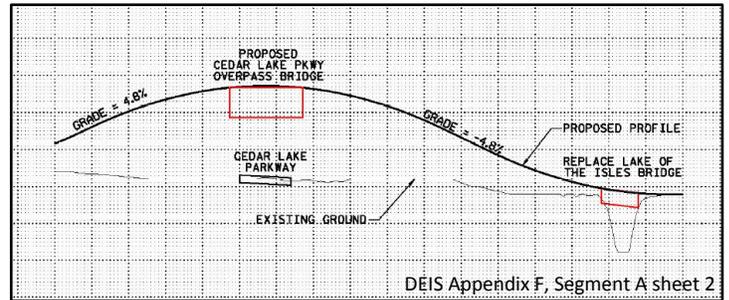
The MPRB is concerned about LRT impacts on the Kenilworth Regional Trail and Chain of Lakes Regional Park users and properties that contribute to the Grand Rounds Historic District. In 2011, according to the Metropolitan Council's annual visit estimates, Kenilworth Regional Trail had approximately 624,400 visits and the Chain of Lakes Regional Park had 5,122,900 visits (Chain of Lakes estimate does *not* include motorized or non-motorized traffic counts on the parkway). Cedar Lake Parkway, as part of the Grand Rounds Historic District, is considered eligible for the National Register of Historic Places (see DEIS section 7.4.1.4 page 7-20).

5.2 Issues: Integrity, flow, and access

The Minneapolis Park and Recreation Board is concerned that adding LRT into this intersection could result in frequent delays of parkway and trail users along or parallel to Cedar Lake Parkway, and create visual obstructions. The MPRB finds that both of these impacts would significantly diminish the quality of experience for parkway, park, and trail users. Further, such impacts are inconsistent with one of the basic design characteristics of the Grand Rounds: a continuous recreational driving experience.

The anticipated frequency of trains along the corridor will also increase potential conflicts between the trains and users of the trail parallel to Cedar Lake Parkway, thus raising serious safety concerns.

The MPRB is also concerned that the proposal to elevate the LRT above the parkway at this intersection (see side image) will increase noise and create visual impacts that will significantly diminish the quality of experience for parkway, park, and trail users of a property that is eligible for the National Register of Historic Places.



The DEIS makes several references to this issue, including the following:

- 7.4.1.4 Section 4(f) Properties Potentially Used by the Project, page 7-20: Cedar Lake Parkway and the Cedar Lake-Lake of the Isles Channel have been determined eligible for inclusion on the NRHP as part of the Grand Rounds Historic District.
- 3.4.5.3 Cultural Resources, page 3.79: Potential long-term effects may occur at the following properties: Cedar Lake Parkway, Grand Rounds (potential effects of the changes to the intersection of the LRT corridor with the historic parkway, including the LRT overpass bridge, and, under the co-location alternative, the effects of widening the trail/rail corridor; these changes may affect the parkway itself and may alter its setting.)

Below are the critical statements and/or outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

5.2.1 Statement: A preliminary feasibility study of a grade-separated crossing at this intersection revealed that lowering the tracks and trail, and bridging portions of the parkway may allow the train and trail to travel beneath the parkway (see Attachment A for illustration). The MPRB recommends further exploration of this type of integrated solution that significantly reduces hazards to pedestrians, bicyclists, and vehicle drivers; noise impacts; visual impacts; and flow disruptions and delays for motorized and non-motorized vehicles.

5.2.2 Outcome: The Grand Rounds (eligible for National Register of Historic Places) fully retains its integrity and intention.

5.2.3 Outcome: Motorized and nonmotorized vehicles and pedestrians along the trail parallel to Cedar Lake Parkway experience continuous and safe flow.

5.2.4 Outcome: Trail users have direct access to the trails and trail connections that are currently provided at this location.

5.2.5 Outcome: Recreational and commuter trail traffic on both the Kenilworth Regional Trail and the trail parallel to Cedar Lake Parkway follows substantially the same route as at present.

5.2.6 Outcome: The view of and from Cedar Lake and surrounding parkland is preserved.

5.2.7 Outcome: The parkland around Cedar Lake remains a natural visual buffer between Cedar Lake and the LRT corridor.



On Cedar Lake Parkway-Grand Rounds; at junction looking SW along Kenilworth Regional Trail; Cedar Lake and beach at right

5.3 Issue: Safety

Safety of park and trail users is a critical objective for the Minneapolis Park and Recreation Board. This includes using design to reduce risks from user conflicts or unexpected hazards, and ensuring adequate access to park facilities when the LRT is in operation. Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor. Due to the proximity of South Cedar Lake Beach, timely emergency medical access across this intersection is critical.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 5.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access South Cedar Lake beach and provide response times that meet relevant laws and standards.

5.4 Issue: Noise and air quality

The Minneapolis Park and Recreation Board is concerned about the noise and air quality impacts of LRT at this intersection due to the high frequency of trains that will cross here. For an at-grade crossing, high levels of track, bell, and whistle noise would significantly diminish the quality of experience in adjacent park land and along the trails. Noise generated by a flyover condition is also a concern. Frequent traffic delays for train crossings are expected to diminish air quality for park and trail users.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 5.4.1 **Outcome:** LRT and crossing-related noise does not diminish the enjoyment and use of the trails, adjacent park land, and Grand Rounds National Historic Byway.
- 5.4.2 **Outcome:** Air quality at this location meets state and federal standards.



At junction, looking NE along Kenilworth Regional Trail



From Kenilworth Regional Trail looking toward Cedar Lake, Grand Rounds

6 Kenilworth Channel, Bridge

6.1 Location and Description

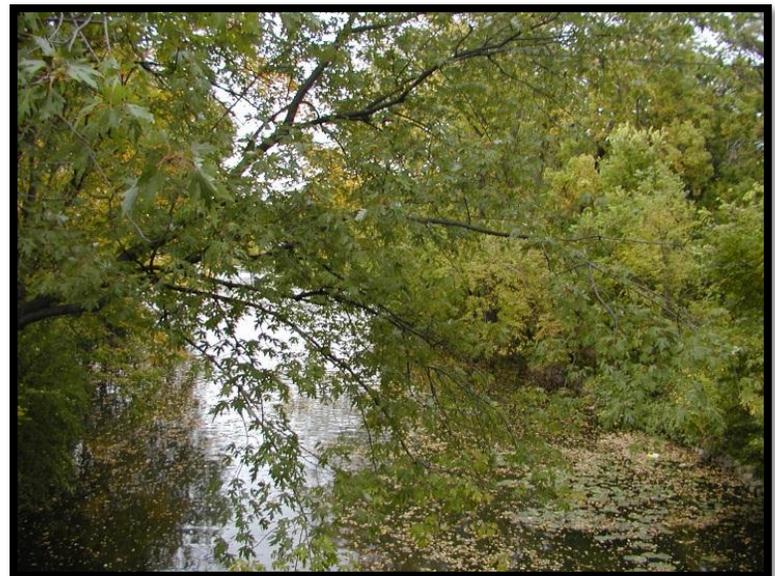
The proposed alignment of the LRT crosses the Kenilworth Channel, a body of water constructed in 1913 to connect Cedar Lake and Lake of the Isles to form the Minneapolis chain of lakes. The Channel has year-round recreational use, from boaters in the summer to skiers and skaters in the winter. The Channel also provides access for wildlife. The bridge over the Channel for the existing freight tracks and trails is narrow and relatively low to the water.



6.2 Issue: Historic character, aesthetics, tranquility

The MPRB is concerned about preserving the historic character of the 1913 Kenilworth Channel in its critical role within the Minneapolis Chain of Lakes Regional Park.

According to the DEIS (3.6.3.3) ...the bridge design, bank treatment, and aesthetics for the new facility and the potential replacement or modification of the existing pedestrian bridge would have a substantial effect on this historic landscape... In addition, (3.4.5.3) ...Potential long-term effects may occur at the following properties: Kenilworth Lagoon/Channel, Grand Rounds (potential effects of the construction of new bridge structures within the historic district; the design and footprint of these structures may affect the banks of the historic channel and may affect the district's overall feeling and setting).



From Kenilworth Regional Trail looking along Kenilworth Channel

While the DEIS notes that these issues will be addressed during preliminary engineering, the MPRB is concerned that they receive the most serious attention very early in the process.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

6.2.1 **Outcome:** Support and safety structures are harmonious, beautiful, and both historically and context

sensitive.

6.2.2 **Outcome:** The Kenilworth Channel retains its natural beauty and serenity and historic character.

6.3 Issue: Connectivity and recreational use

The Kenilworth Channel was central to creating the Minneapolis Chain of Lakes and provides a critical connection between Cedar Lake and Lake of the Isles. Trail access is necessary for people as is year-round channel access for both people and wildlife.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

6.3.1 **Outcome:** Users have access to the Kenilworth Regional Trail, Cedar Lake, and Lake of the Isles from both sides of the LRT/Kenilworth Regional Trail.

6.3.2 **Outcome:** People and wildlife on both sides of the LRT/Kenilworth Regional Trail have access to and along the undeveloped channel shoreline.

6.3.3 **Outcome:** Users have unfettered, year-round passage along the channel (in the water/on the ice) between Lake of the Isles and Cedar Lake.

6.3.4 **Outcome:** The historic water connection between Cedar Lake and Lake of the Isles remains a defining characteristic of the Minneapolis Chain of Lakes Regional Park.



Path between trail and channel

6.4 Issue: Safety

The MPRB is concerned about protecting the safety of land and water users of the Kenilworth Channel and shoreland.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

6.4.1 **Outcome:** Year-round channel users are safe from falling debris and ice.



On Kenilworth Regional Trail overlooking Kenilworth Channel

7 Intersection with West 21st Street

7.1 Location and Description

The intersection of the Kenilworth Regional Trail and 21st Street is a proposed station location. The station would sit on Hennepin County property, however the west side of the rail line is MPRB property, Cedar Lake Park.

At 21st Street, Cedar Lake has a very popular beach and provides access to a trail network as well as informal foot paths.



7.2 Issue: Park access

This location is the sole access point for Cedar Lake Park and beach. Visitors arrive at this pristine area on foot, by bicycle, and using motorized vehicles, and via 21st Street, the Kenilworth Regional Trail, and in the future the LRT. Given that “Implementation of LRT service and stations along the Segment A alignment would likely result in some land use changes surrounding the stations...” (3.1.5.1), the natural character of this area and clear access must be ensured.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 7.2.1 **Outcome:** Access to Cedar Lake Park at West 21st Street is attractive, natural, and welcoming.
- 7.2.2 **Outcome:** People on the east side of the corridor safely and easily access park lands on the west side.



At intersection, look west into Cedar Lake Park

7.3 Issue: Safety

With thousands of park and park land users and multiple modes of transport across and along the corridor at this point, safety is of utmost importance. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

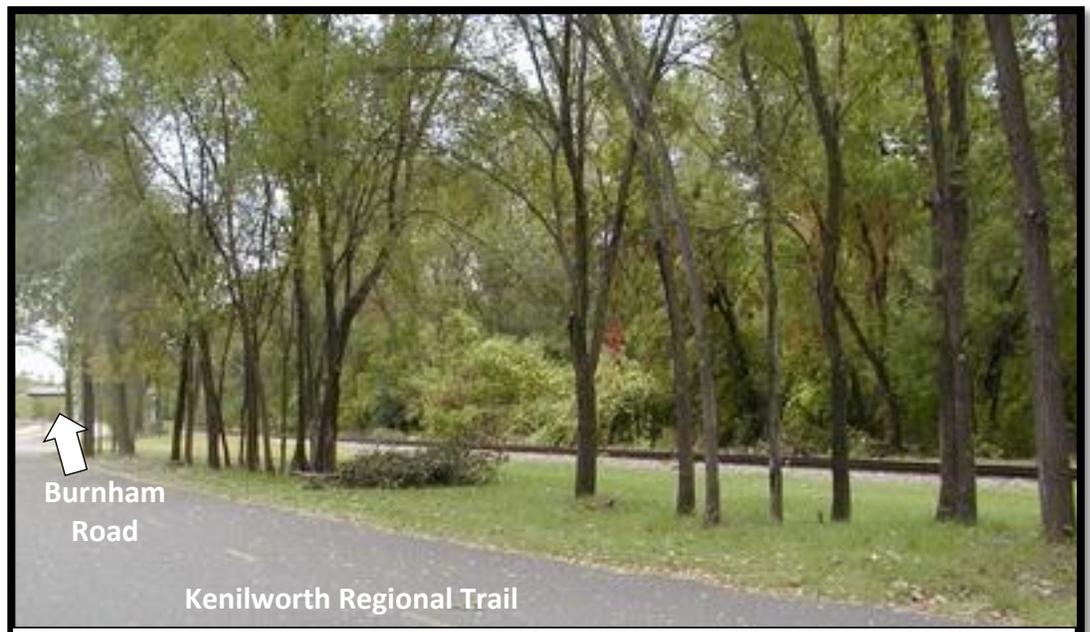
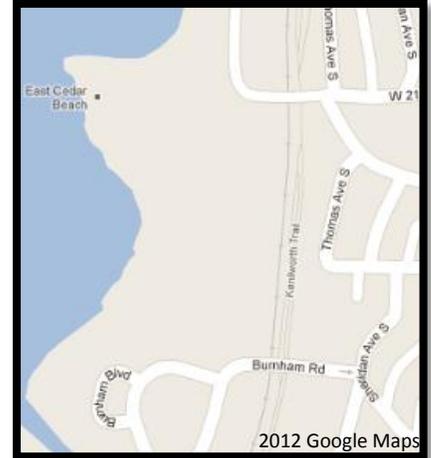
- 7.3.1 **Outcome:** All Cedar Lake Park users have safe and pleasant access to and from the park, regardless of mode of transport.
- 7.3.2 **Outcome:** Station design *enhances* safety and access for Cedar Lake Park users.

7.4 Issue: Aesthetics, noise

The MPRB is concerned that the anticipated 1000+ daily LRT boardings (Appendix F, Transit Effects, Figure 2) at this location would seriously compromise the quality of experience for users of this secluded park area.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 7.4.1 **Outcome:** Cedar Lake Park remains a quiet, tranquil, and natural park destination.
- 7.4.2 **Outcome:** The area between Burnham Road and 21st Street is naturally beautiful and serene.



Looking SW from 21st Street

8 Cedar Lake Regional Trail and SW LRT Crossing Area

8.1 Location and Description

The federally funded Cedar Lake Regional Trail carries commuter and recreational bicyclists, and pedestrians between downtown Minneapolis and the western suburbs. At this location the trail junctions with the Kenilworth Regional Trail and the LRT follows the Kenilworth

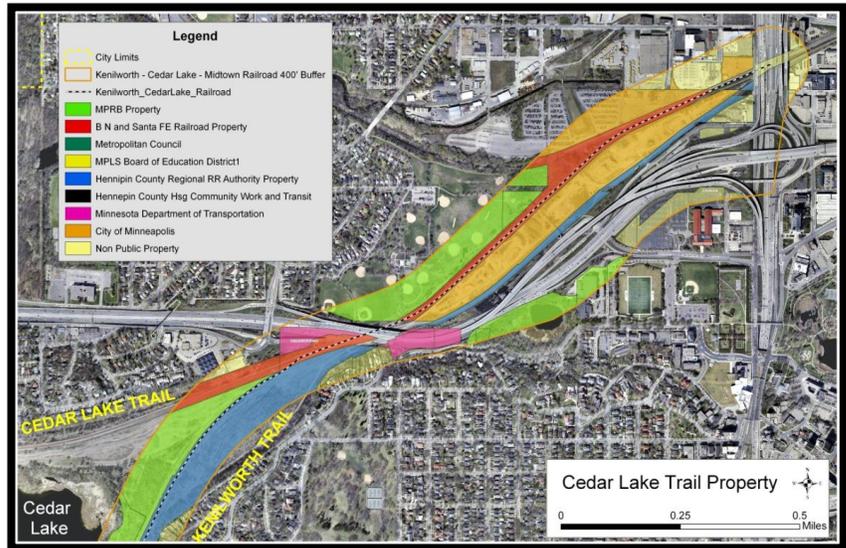


alignment south. In this area the bike trails are separated into north- and south-bound, and there is a separate pedestrian trail. **The land in this area is owned by the County and the MPRB. Per agreement, the prairies and trails are maintained by the MPRB.**

Into this already complex area the LRT brings dramatically increased complexity (6.3.2.4).

8.2 Issue: Safety, use, access, connectivity

The MPRB is very concerned about retaining safe and high-quality use and access to the regional trails in this area for all users and from designated access points.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.2.1 **Outcome:** Walkers, runners, bicyclists, and other non-motorized trail users safely and efficiently get from one side of the LRT tracks to the other, year-round and without interruption.
- 8.2.2 **Outcome:** The federally funded, non-motorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 8.2.3 **Outcome:** All users have adequate access the trails.
- 8.2.4 **Outcome:** All trail connections are safe and easy to navigate.
- 8.2.5 **Outcome:** The Cedar Lake Regional Trail meets commuter bicycle standards of 20 mph design speed.
- 8.2.6 **Outcome:** Communities north of the LRT easily access the trail and Cedar Lake Park.

8.3 Issue: Environmental protection

The MPRB park lands in this area bring significant benefits to park and trail users, support native prairie, and are serve as important animal habitat.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

8.3.1 **Outcome:** Park lands retain their natural character.

8.3.2 **Outcome:** Wildlife habitat supports local and migratory fauna.



At junction of Kenilworth Regional Trail (center left) and Cedar Lake Regional Trail (top left and bottom right)



At junction, looking west along divided Kenilworth Regional Trail

9 Bryn Mawr Meadows Park

9.1 Location and Description

Bryn Mawr Meadows Park is an active neighborhood park with citywide appeal. Amenities include ball fields, tot-lots, wading pools, and tennis courts. The park is adjacent to the Cedar Lake Regional Trail and LRT line. Currently parks users are connected to the trail via a bridge over the industrial area and freight rail line, and spiral ramps at each end.

9.2 Issue: Access and safety

The MPRB is concerned about ensuring that people from throughout the community can access both this heavily used park *and* the Cedar Lake Regional Trail from this area, and that the trail remains fully functional.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

9.2.1 **Outcome:** Communities on both sides of the LRT safely and easily access the Cedar Lake Regional Trail and Bryn Mawr Meadows Park.

9.2.2 **Outcome:** The federally funded, non-motorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.

9.3 Issue: Visual appeal

The MPRB is concerned that this large and active park retain its open and natural feel.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

9.3.1 **Outcome:** The LRT blends in visually with the natural setting of the area.

9.3.2 **Outcome:** The surrounding park land has an open space look and feel.



Bryn Mawr Park, looking south from Morgan Avenue

10 Spring Lake Trail Junction

10.1 Location and Description

At this location Cedar Lake Regional Trail users pass under I-94 and easily connect to the nearby parks and trails including Spring Lake, Kenwood Parkway, and Parade, and travel beyond to the sculpture garden, Loring Park, and the Grand Rounds National Scenic Byway.



10.2 Issue: Access, flow, and connectivity

As a critical access point to MPRB park lands and the Grand Rounds, MPRB is concerned that safe and easy access and connectivity is retained.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.2.1 **Outcome:** Cedar Lake Regional Trail users easily and safely connect to Spring Lake Park, Grand Rounds, other parks, and parkways.
- 10.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 10.2.3 **Outcome:** The design prioritizes connectivity to neighborhoods and natural amenities.



From junction, looking southeast toward Spring Lake

10.3 Safety

In this small space under I-94, the MPRB is concerned about public safety and emergency vehicle access. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access the trail and Spring Lake and provide response times that meet relevant laws and standards.

10.4 Issue: Coordination with future development

As with many locations along the LRT, this area will likely be subject to future development. The MPRB is concerned about protecting the integrity and natural features of Spring Lake.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.4.1 **Outcome:** Spring Lake and the area's natural features are preserved and protected.

11 Luce Line Regional Trail Junction

11.1 Location and Description

At this location the Luce Line Regional Trail intersects with the Cedar Lake Regional Trail, currently via a bridge over the industrial area and freight rail line, and spiral ramps at each end.

This is a critical connection in the regional trail system, and also provides access to both Bryn Mawr Meadows Park.



11.2 Issue: Access, flow

The MPRB is concerned that trail and park access be maintained, as well as flow and speed on the regional trails.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

11.2.1 **Outcome:** Trail users easily and safely make connections between Bryn Mawr Meadows Park, the Luce Line Regional Trail, and the Cedar Lake Regional Trail.

11.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.



Luce Line Regional Trail crossing to connect with the Cedar Lake Regional Trail

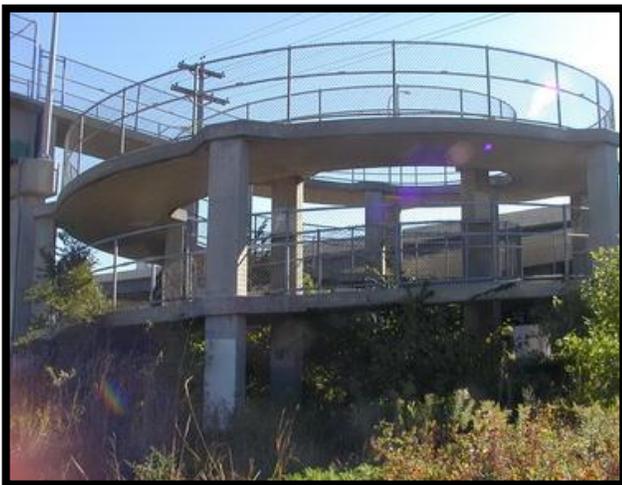


Figure 1 One of the spiral ramps that are at both ends of the Luce Line Regional trail crossing bridge

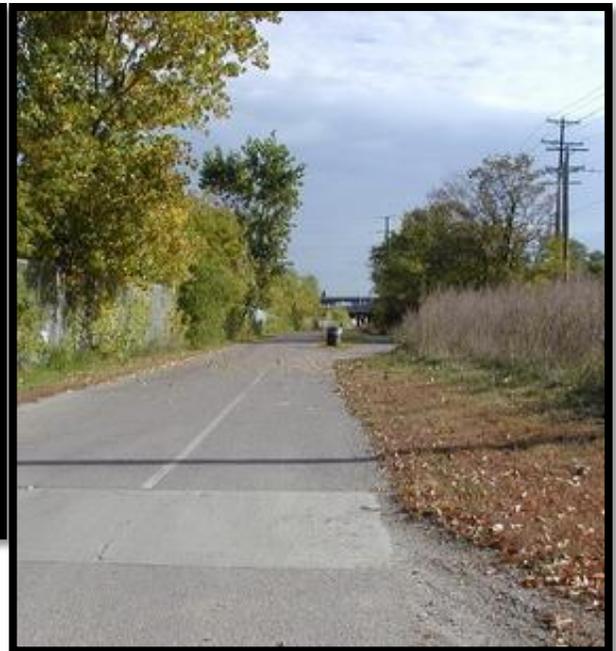
12 Linden Avenue

12.1 Location and Description

Linden Avenue is a trail access, but is used primarily by city maintenance vehicles to access the asphalt and concrete recycling facility. Trail users at this access point regularly deal with high vehicular traffic with the nearby entrance to I 394. At this location, the SW LRT line and trail separate from MPRB-owned land.



From Linden Avenue junction, looking southwest along Cedar Lake Regional Trail



From Linden Avenue junction, looking northeast along Cedar Lake Regional Trail