

May 12, 2016

Michael Ridley, City Planner
City of Eagan
3820 Pilot Knob Road
Eagan, MN 55122

RE: Final Alternative Urban Areawide Review– Minnesota Vikings Headquarters and Mixed Use Development
Metropolitan Council Review File No. 21514-3
Metropolitan Council District 15

Dear Mr. Ridley,

The Metropolitan Council (Council) reviewed the Minnesota Vikings Headquarters and Mixed Use Development Final Alternative Urban Areawide Review (AUAR) to determine its adequacy and accuracy in addressing regional concerns. Council staff evaluated the draft recommendations of the Draft AUAR received March 14, 2016, and the Final AUAR submitted May 2, 2016. The Council offers these comments in the spirit of strengthening the value of the AUAR for the benefit of the developer, the City of Eagan (City), its neighbors, additional stakeholders, and the Region.

The AUAR includes a Traffic Impact Study, but remains inadequate in addressing the potential impacts to the regional transportation system. The Traffic Impact Study identifies many mitigation measures and describes a monitoring program designed to track the change in traffic volumes at key intersections. The methodology indicates thresholds that, when met, would trigger the need for further traffic analysis. However, it is unclear to the Council what the outcome of this potential future traffic analysis would be. The Council believes that the Mitigation Plan needs to include a more detailed implementation plan for the mitigation of the traffic impacts of the development as part of the AUAR.

The Mitigation Plan states on page 23 that the “[r]esponsibility for constructing and funding of these strategies will be determined between the City and developer, and will be documented in developer’s agreements.” Because the impacted roads may be under county or state jurisdiction, it is important that additional jurisdictions be engaged at the appropriate stages in order to understand the strategies that are to be implemented. The plan also states on page 23 that the City may “revoke the right to acquire building permits and/or certificates of occupancy until all relevant mitigation measures have been addressed.” But it appears that no test for relevancy is detailed in the plan.

The Traffic Impact Study also identifies many mitigation measures, particularly along TH 55. The Council sincerely questions whether the spacing needed for these measures can be met. While individually these measures can be implemented and can be effective, the implementation of all of them may be more problematic. The Council

believes that further analysis, and possibly some design, needs to be conducted to verify that the mix of improvements proposed can indeed be achieved in the corridor and result in the necessary mitigation.

From the information contained in the AUAR and related correspondence, the Council believes that the extent of traffic affects are still unknown. The Council believes that the AUAR does not fully analyze the impacts to the regional road system nor adequately addresses those impacts in the Mitigation Plan. The Council believes that additional analysis and documentation of future traffic volumes is needed to identify the full area of impacts on the road system of the City and the regional highway system.

In order to give the Council and the City an opportunity to further explore the matters described above with the other affected parties, the Council believes that the appropriate step at this time is to file an official objection to the AUAR, pursuant to Minnesota Rules 4410.3610, subp. 5.D based on:

- Lack of detail in timing and implementation of the mitigation plan.
- Insufficient documentation of future year traffic changes due to the proposed development.

The Council's responsibility is to fully assess impact to the regional transportation system. To do this, the Council needs to fully understand how the monitoring and Mitigation Plan will address the affects to the regional transportation system. This issue may be resolved by promptly submitting the above-detailed information, which will enable the Council to fully evaluate the impacts to the regional system as soon as possible. The Council's will then work with the City and proceed so construction on the project can begin in a timely manner. The Council recognizes the significance of this project to the City and to the Region. Consequently, the Council is prepared to proceed as quickly as possible in order to achieve the City's and developer's objectives.

Comprehensive Plan Amendment Review

As you know, the Council is reviewing both a Comprehensive Plan Amendment (CPA) and the AUAR related to the Minnesota Vikings headquarters site. Although related to different portions of state statute, the reviews currently underway are for the same project and the concerns the Council has regarding potential effects to the regional transportation system need to be addressed for both reviews. According to applicable statute, the response to the AUAR is required by May 12, 2016, and for the CPA, the Council's determination of completeness regarding the CPA submittal is due to the City by May 20, 2016.

The Council received supplemental materials May 2, 2016, so a "completeness" determination is due to the City by May 20, 2016. Once the issues discussed in this letter are addressed and the amendment is determined to be "complete," the Council has 60 days from receipt of supplemental material to render a final decision. If needed to complete the review, statute allows the Council an additional 60 days. Additional time is typically only requested to accommodate committee meeting schedules. Due to the size and scope of this amendment, the Council's review will include review first by the Metropolitan Council's Community Development Committee and the Transportation Committee, and then the governing body of the Metropolitan Council for final action.

The Council sincerely believes solutions exist to the issues raised in this letter and in previous correspondence. The Council looks forward to working with the City to resolve them as quickly as possible. The Council requests that the City staff and Council staff schedule a meeting at the earliest opportunity. Please contact me at 651-602-1895, or Patrick Boylan, Principal Reviewer, at 651-602-1438, to schedule that meeting or for any questions concerning the Council's review of the AUAR.

Sincerely,



LisaBeth Barajas, Manager
Local Planning Assistance

CC: Environmental Quality Board
Tod Sherman, Development Reviews Coordinator, MnDOT
Steve O'Brien, MHFA
Steven Chávez, Metropolitan Council District 15
Arlene McCarthy, Metropolitan Transportation Services
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