



## Appendix H - Comments Received on Draft Plan

| Date Received | Document Draft Date | Source                        | Comment  | Response/Action  | # |
|---------------|---------------------|-------------------------------|--|--|---|
| 11.22.2021    | 11.22.2021          | Project Website Online Survey | <p>For zones 1 &amp; 5: I like the four-lane roadway design with the median in the middle that can be used for the following: stormwater management, to hold snow, a greenspace, and designated turn lanes and pedestrian crosswalks. I also like the idea of the shared-use path on the north side of the roadway and a sidewalk on the other with boulevard trees separating the roadway from the sidewalk and shared use path. This would also help to mitigate the impacts of climate change too. And I like that the additional lane could be converted to a bus only lane. However, instead of being a bus-only lane, separate bus pull-out lanes could be added instead cutting into the boulevards where necessary with designated bus stops.</p> <p>For zones 2-4: I like the four-lane roadway design option: I like the idea of the center median dividing the roadway and having designated turn lanes and crosswalks. In addition, I like the shared-use path on the north side of the roadway and sidewalk on the south side with boulevard trees separating the pathway and sidewalk from the roadway. I also like the continuation this design provides with zones 1 &amp; 5. However, instead of being a concrete median, this could be a greenspace with boulevard trees and to provide associated pros and with necessary crosswalks and turn lanes as needed. And instead of having two lanes of traffic in each direction, one lane on each side of the roadway could be used for on-street parking for businesses and as designated bus pull-out lanes where necessary.</p> <p>Finally, for the three-lane roadway design option, I like the idea of the shared-use sidewalk on the north side and the sidewalk on the south side with boulevard trees separating the sidewalk and pathway from roadway. However, I do not like the idea of a center turn lane. Instead, the center turn-lane could be a greenspace separating two travel lanes (one lane in each direction) with cosswalks and turn lanes as needed. And there could be bus pull-out lanes as needed.</p> | Thank you for your comments on the Central Entrance Vision Plan. Potential roadway design concepts will continue to be evaluated as MnDOT begins the preliminary design process, which will include additional public engagement efforts.  | 1 |
| 11.22.2021    | 11.22.2021          | Project Website Online Survey | Stop the overflow of traffic on Maple Grove Rd the deterrents promised have never been fulfilled. Traffic increase, speeding, semi truck, commercial vehicles etc are a constant on our residential 30 mph street!!!! The amount of close calls for anyone walking, biking or just going to get your mail is unacceptable.   | Thank you for your comments on the Central Entrance Vision Plan. Balancing the needs of all users on, along, and across Central Entrance will be a key consideration in determining the final roadway design.  | 2 |
| 11.30.2021    | 11.22.2021          | Project Website Online Survey | <p>1) One of the goals is: "Safe &amp; equitable multimodal transportation system: Central Entrance will be a safe, accessible, and comfortable street for all people, making walking, biking and transit viable and an easy choice while moving people and goods in cars, trucks, and buses safely and efficiently," but effecient movement of motor vehicles is in conflict with safe, accessbiel, and comfortable streets for walking and biking. Vehicles need to slow down, there needs to be more safe pedestrian crossings, better access to businesses, etc. These all reduce efficiency, but they are necessary.</p> <p>2) There is no discussion about how this corridor primarily serves people who do not even live in Duluth, allowing them to get into the heart of downtown at the expense of the livability to the neighborhood(s) it cuts through and the residents whose taxes go toward the street.</p> <p>3) please do not do one-way pairs. This is not a best practice and there is plenty of roadway space to design something all on C. Entrance.</p> <p>4) What does "provide a bicycle facility on at least one side" mean? This would not serve people biking. It would be like the current layout of a sidewalk on only one side, which just facilitates people crossing this dangerous road mid-block to access the sidewalk on one side because there is no sidewalk on the other side to get to them. the same would be true to for bikes, and does not meet the goal of safe, accessible, and comfortable street nor a viable and easy choice to bike.</p> <p>5) Goal D: including pedestrian safety countermeasures only at signalized intersections is not enough. They are too far apart. Mid-block crossings are a must.</p>   | Thank you for your comments on the Central Entrance Vision Plan. Balancing the needs of all users on, along, and across Central Entrance will be a key consideration in determining the final roadway design. A recommendation to add mid-block crossings is included in the plan (C.2) as part of Goal C, "Improve the ability to walk and bike along and across Central Entrance." | 3 |

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|---------------|---------------------|-------------------------------|---|---|---|
| 12.02.2021    | 11.22.2021          | Project Website Online Survey | <p>I have a thought on Goal B. I understand that B.1 (avoiding bus pull out lanes) prevents bus delays. But the way it's worded sounds incompatible with the goal of getting ready for BRT service. For example, designs for the Gold Line BRT in the Twin Cities include bus pull out lanes, or "guideways" in the station area plans. I would recommend rewording the language for B.1 so it doesn't sound like guideways are off the table moving forward. The Land Use Scenario section of the Vision Plan makes a great case for BRT on Central Ent.</p> <p>It's good to see access management is discussed in Goal G. I've been in an accident involving a left-turning vehicle on Central Ent near Arlington Ave. I would like to see creative median improvements for traffic, such as RIRO and 3/4 intersection treatments, in addition to mid-block pedestrian crossings in this area. Snelling Ave in St Paul between University Ave and Minnehaha is an interesting example of this. There's even a RIRO with a cutout for bikes.</p>     | <p>Thank you for your comments on the Central Entrance Vision Plan. The Duluth Transit Authority does not anticipate the need for bus guideways on Central Entrance at this time.</p> <p>Considering access management strategies will be part of MnDOT's roadway design process.</p>   | 4 |
| 12.07.2021    | 11.22.2021          | Project Website Online Survey | As a regional traveler, who recognizes this corridor as a thru-route, I'm concerned about the travel delay of potentially using US 53, Arrowhead Rd. or other corridors to access the hospital district in particular (if Central Entrance is reduced to three lanes). Online mapping sources estimate a ten-minute delay from Miller Hill, Hermantown, Iron Range or other points north for EMS traveling by vehicle (i.e. if an ambulance uses Trinity Rd. and I-35 instead of Central Entrance). Although Trinity Rd. is built to carry more traffic, travel patterns are not shifting to this built section. MnDOT's online traffic count map - which was counted after Haines Rd. was improved and before TPI started construction - seems to indicate significantly more vehicular use of the TH 194 corridor between Anderson Rd. and I-35 compared to Trinity Rd. (or Haines Rd.). I agree with the benefits of improved pedestrian and bicycle accommodations, and I hope the needs of all modes of travel can be balanced most effectively. | Thank you for your comments on the Central Entrance Vision Plan. Balancing the needs of all users on, along, and across Central Entrance will be a key consideration in determining the final roadway design. It should be noted that EMS vehicles have advantages such as signal priority that allow them to travel more quickly than other vehicles.  | 5 |
| 12.01.2021    | 11.22.2021          | Public Input Session          | When will land use/development change will take place?  | This is the beginning of the process, and stay tuned to the process, with MnDOT taking this on in 2022. The design of the corridor is not set with construction 5+ years away. Encouraged to stay apart of this process.  | 6 |
| 12.01.2021    | 11.22.2021          | Public Input Session          | What does the timeline for this process look like? Is it estimated to be a 3 year, 5 year, or 10 year-long project?   | Construction is preliminarily set for 2026/2027. The vision plan process is being completed in 2021. Over the next 2 years the overall design will be decided, then moving on to final construction design. However, we do not know what project outcome is at this time. Depending on the scale/scope of the project, this could be a one-year or 2-year construction project. Public outreach begins in 2022. | 7 |
| 12.01.2021    | 11.22.2021          | DTA Board Meeting             | Could Palm Street be utilized as a transit route?   | Palm Street is being looked at as part of the One-Way pair option, but has not been considered at this time as a bus transit dedicated route.   | 8 |
| 12.01.2021    | 11.22.2021          | DTA Board Meeting             | Appreciate being integrally apart of this project from the very beginning, as the DTA implements the Better Bus Blueprint, Central Entrance is one of the key transit corridors recommended for improvements, including upgrading the corridor to some level of Bus Rapid Transit.  | DTA will continue to be a key partner in all stages of the planning, designing, construction and funding of Central Entrance project.   | 9 |

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| 11.09.2021    | MIC              | Mike Wenholz     | 11.05.2021          | Draft Plan           | Multiple    | Some recommended concept drawings have a "trail" label rather than "shared use path", making them inconsistent with the surrounding text.   | "Trail" has been replaced with "Shared Use Path" in the concept drawings.  | 1  |
| 11.09.2021    | MIC              | Mike Wenholz     | 11.05.2021          | Draft Plan           | Multiple    | One-way cycle tracks are not included in the "project elements" table.  | Cycle tracks do not appear in any of the recommended concepts as currently presented, although they do appear in the alternate concept for Zones 1-5.  | 2  |
| 11.09.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | 7           | Are there some specific ideas on different approaches to reach businesses and get them interested?  | A new recommended strategy has been added to suggest door to door contact and surveys of businesses in the corridor.   | 3  |
| 11.09.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | 13          | In Section 4.6 - two additional contentious issues: right of way and right-in/right-out driveways   | These two issues have been added to the list of potentially contentious issues.  | 4  |
| 11.09.2021    | MIC              | Rondi Watson     | 11.05.2021          | Engagement Framework | 14          | What are some key messaging points for the next phase of engagement?  | Key messages should be based on the Guiding Values from the Central Entrance Transportation Plan. These values have been added to Section 4.1, and additional notes on key messages have been added to Section 4.8.  | 5  |
| 11.09.2021    | MIC              | James Gittemeier | 11.05.2021          | Engagement Framework | 11          | Initial early door to door surveys is a strategy that has worked for other projects in Duluth and could be considered here.   | A new recommended strategy has been added to suggest door to door contact and surveys of businesses in the corridor.   | 6  |
| 11.11.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | Multiple    | WSB has done a good job documenting the engagement that happened during the planning study and summarizing the findings of that engagement, as well as identify the potentially contentious issues with this project.   | Comment noted.   | 7  |
| 11.11.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | Multiple    | However, it would be very beneficial for the project moving forward if more information/detail was included on the other key areas of the framework. More specify:<br>•Task - Recommendations on how to get more people and interest groups engaged in the project. Including businesses, developers, property owners, and traveling public commuters.  | Additional recommended strategies have been added to Section 4.4 to engage businesses, developers, property owners, and commuters, including roundtable developer discussions, commuter and visitor surveys, and using existing tools such as the walking audit videos. Additional details have been added to the door to door business outreach and "beyond the neighborhood" pop-up strategies.  | 8  |
| 11.11.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | Multiple    | •Timelines – Recommendations on when, and at what miles stones in design would be appropriate to engage different groups of people. For example, I am thinking the land owners and business owners directly affected by the project would be better to engage earlier than the general public.  | A general engagement timeline has been added as Figure 3 to represent when the recommended strategies should be pursued in relation to the phases of preliminary and final design. This is only one approach, and should be refined with more specific dates as the project progresses.  | 9  |
| 11.11.2021    | MnDOT            | Doug Kerfeld     | 11.05.2021          | Engagement Framework | Multiple    | •Detailed list of contacts – It would be very helpful if a specific list of stakeholders with contact information was included. If possible, this should include, name of business/organization, correct person to talk to about the project, phone number and email to that person.  | A list of stakeholders with contact information will be provided to the MIC and MnDOT as part of the submittal of final project documents. Contact information for specific individuals was excluded from public-facing documents to reduce potential privacy concerns.  | 10 |
| 11.15.2021    | St. Louis County | Vic Lund         | 11.05.2021          | Draft Plan           | 46          | I have some thoughts on the base concept evaluation in the draft report. The "Four-Lane Section" concept is listed as "Mixed/Unclear" for "Walkability" and "Bikeability" in the following evaluation table. According to the draft report (pg. 46), the determination to assign "Yes", "Mixed/Unclear" and "No" is whether the features of the concept are "likely to advance each component of the planning process goals". It seems that the "Four-Lane Section" would advance the goals of walkability and bikeability over the existing condition. Specifically, because the two-way center-left-turn-lane would be eliminated and replaced with a raised concrete median that would act as a refuge. Additional features of the "Four-Lane Section" concept includes a 10 ft shared use path where only sidewalks exist today, and boulevards on both sides of the road providing separation for peds/bikes. The key word I'm looking at is whether the concept would advance these goals. It seems this concept truly does advance these goals.<br><br>Please help me understand this determination. | "Mixed/Unclear" was initially used for Walkability and Bikeability under the Four-Lane Section to reflect the fact that while new facilities would be provided, crossing distances would not be reduced without additional changes. However after further review, both have been changed to "Yes." As noted in the comment, both would be improved over the existing condition, setting aside comparisons to the other two concepts. Text related to crossing distance has been removed to eliminate any confusion, as this issue is adequately addressed in the discussion of the four-lane concept in Section 7.3.2. | 11 |
| 11.15.2021    | St. Louis County | James Foldesi    | 11.05.2021          | Draft Plan           | NA          | See attached letter from James Foldesi, St. Louis County Public Works Director/Highway Engineer, dated 10/26/21 (received by WSB 11.15.2021).   | Comment noted. No final design decisions have been made at this time. The three-lane concept will be explored in greater detail in future phases along with the other concepts recommended for further evaluation.   | 12 |
| 11.16.2021    | MIC              | Rondi Watson     | 11.05.2021          | Engagement Framework | NA          | Could use of the walking audit videos created for the virtual workshops be added as an engagement strategy?   | Use of the walking audit videos has been recommended as part of an additional strategy in Section 4.4.   | 13 |

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| 11.29.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | Multiple    | Within the report it appeared that all of the graphics depict a grass boulevard between the curb and sidewalk/shared use path/bike trail. We feel that this feature will be a topic of discussion during pre-design and do not want to set the expectation to the public that 1) A boulevard is garneted to be part of the final plan, 2) That a boulevard will be grass if included. Could a statement or a note on the graphics cautioning that boulevards may be hard scape, variable width, or not included in final plans. | The following note will be added to the typical sections and visualizations: "Note: The concepts shown are for illustrative purposes only. Design details including roadway configuration and surface types will be established in the preliminary and final design processes."  | 14 |
| 11.29.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | Multiple    | We also wanted to point out that trees, lights and other feature that could be placed within the boulevard could create more difficulty for maintenance, specifically snow removal if the expectation is that MnDOT will continue to use their large snowblower to remove the snow from the corridor.   | In Table 8, "May require modifications to winter maintenance practices" has been added to the list of potential challenges for street trees and sidewalk/shared use path lighting.   | 15 |
| 11.29.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | 45          | In the report where the one way pairs are discussed no bike/ped facilities are shown/discussed on the south/east bound portion of the roadway. We are thinking even if two way non-motorized facilities are constructed on the north/west bound corridor we would still want to discuss an option to induced a sidewalk facility.   | The Palm Street typical section for the one-way pair shown on page 45 has been updated to include sidewalks and boulevards on both sides, both with unspecified widths. The following text has also been added: "Note: Existing sidewalks along Palm Street vary. Sidewalks and/or shared use paths would be evaluated as part of the final design." | 16 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | Multiple    | (Follow up discussion to Comment #14)<br>Graphics in the plan should include a disclaimer that design details are TBD, no specific design elements are final.   | See response to Comment #14.   | 17 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | 48          | (Follow up discussion to Comment #15)<br>Ensure that items in Table 8 that would have potential maintenance challenges are noted as such.   | See response to Comment #15.   | 18 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | Multiple    | Make sure it is clear in the plan that options are still open, and the corridor may not be a consistent design throughout (variable boulevard widths, etc.).  | Various locations in the plan note that the concepts presented are only preliminary options for further analysis, such as the first paragraph of Section 7.3. See also response to Comment #14.  | 19 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | 5           | Section 4.4 and Figure 4 note that there is a multiuse trail along Mesaba Avenue north of Central Entrance. This is noted incorrectly. Mesaba Avenue becomes Rice Lake Road north of Central Entrance.  | Text in Section 4.4 and Figure 4 have been updated to correctly identify Rice Lake Road and Mesaba Ave. This issue has also been fixed on other maps.  | 20 |
| 11.30.2021    | MnDOT  | Bryan Anderson | 11.22.2021          | Draft Plan | 54          | If a 3-lane section is pursued, a follow up study would need to be conducted addressing impacts on local routes and where improvements would be needed on these routes. This could be added as a recommendation or to the list of questions to be answered through further study.   | The following has been added to the list of Key Questions for Further Analysis in Section 7.3.4: "How would changes to the roadway configuration such as reducing the number of travel lanes impact city and county roadway systems, both from a traffic volume and safety perspective for all users? (Potential need for additional study)"         | 21 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | 45          | (Follow up discussion to Comment #16)<br>The graphic showing the one-way pair typical section for Palm Street should show nonmotorized facilities and include a note that they would be evaluated.  | See response to Comment #16.   | 22 |
| 11.30.2021    | MnDOT  | Doug Kerfeld   | 11.22.2021          | Draft Plan | 54          | The list of questions for further study should discuss the use of StreetLight data to supplement bike/ped counts and allow for analysis of origins and destinations.  | The following has been added to the list of Key Questions for Further Analysis in Section 7.3.4: "How could sources such as StreetLight data be used to supplement existing bicycle and pedestrian counts and enhance the understanding of nonmotorized origins and destinations in the corridor?"   | 23 |

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| 12.01.2021    | City of Duluth | Steven Robertson | 11.22.2021          | Draft Plan | 57          | <p>My only minor concern is...or request I guess, is asking for a slight edit:</p> <p>Top of page 57 says "based on this information (i.e. density), the team concludes that rezoning the project area to MU-C would allow for the highest density redevelopment opportunities to serve future transit stops".</p> <p>Is it possible to edit this? I think recommending highway commercial in this area is a departure from our previous plans, and is something that needs review to weigh the pros and cons....we likely would get demands for big box retails if we rezoned it to MU-C.</p> <p>So that is my one request, editing or wordsmithing that passage so that it is more of a possibility or an alternative regarding more density than a recommendation on a zoning change.</p> | See response to Comment #25 based on follow up conversation with City of Duluth. Text at the end of Section 7.4.2 has been modified to note that MU-C was used for the analysis of development potential, but actual Plan recommendations do not call for a specific zoning change.   | 24 |
| 12.02.2021    | City of Duluth | Adam Fulton      | 11.22.2021          | Draft Plan | Multiple    | MU-C is not the appropriate zoning for this corridor. As it is used in Duluth, it would allow for more suburban-style big box development that the City would like to see in this corridor. Could instead recommend looking at zoning to align more with the comprehensive plans and allow a higher level of development intensity and wider range of uses.  | Recommendation E.2 has been removed. Recommendation E.3 (new Recommendation E.2) has been modified to state the following: "Rezone the nodes within 1/4 mile from the Route 102 BRT stops to align with the Comprehensive Plan, allow for a higher level of development intensity and a wider range of uses, and encourage multistory mixed use development." | 25 |
| 12.02.2021    | City of Duluth | Adam Fulton      | 11.22.2021          | Draft Plan | 45          | Would like to reiterate that the City of Duluth is opposed to the one-way pairs option.  | Comment noted. The City of Duluth's opposition to the one-way pair concept is noted on page 45.   | 26 |
| 12.02.2021    | City of Duluth | Adam Fulton      | 11.22.2021          | Draft Plan | 46          | It is a bold recommendation to say that the corridor should not be reconstructed exactly as it is today. The City supports this.   | Comment noted.  | 27 |
| 12.02.2021    | City of Duluth | Adam Fulton      | 11.22.2021          | Draft Plan | 37          | The City is not optimistic that street trees in boulevards and medians would be properly maintained along the corridor. It is fine to show in the visuals as something aspirational, but need to note the importance of proper maintenance in the recommendations.   | Comment noted. The following statement has been added to Recommendation F.1 (maintenance agreement): "The agreement should address all applicable aspects of maintenance, including upkeep of street trees and other potential streetscape elements."   | 28 |
| 12.02.2021    | City of Duluth | Adam Fulton      | 11.22.2021          | Draft Plan | 30          | Should a potential recommendation related to visual quality in the corridor be added? Could address discussions in virtual workshops about billboards.   | The following statement has been added to Recommendation K.2 (streetscape plan): "The plan should address potential changes to existing elements that impact visual quality in the corridor, such as billboards."   | 29 |



# Saint Louis County

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**James T. Foldesi, P.E.**  
Public Works Director/  
Highway Engineer

10/26/2021

Ron Chicka, AICP  
Director  
Duluth Superior Metropolitan Interstate Council  
221 West 1<sup>st</sup> Street  
Duluth, MN 55802

**Re: Central Entrance Transportation Planning Study**

Dear Mr. Chicka,

I would like to express my appreciation for including St. Louis County as a stakeholder in this important planning study. Second, I echo the goals of the planning study which are to improve the functionality of the Central Entrance corridor with regards to issues such as access management, reduction in traffic congestion, providing a more friendly environment for pedestrians, bicycles and transit and as an aid in land use decisions.

As the study has progressed, I understand that one of the key alternatives being analyzed is the concept of converting the existing 5-lane corridor to a 3-lane corridor. According to the analysis, a model has estimated that upwards of 7,000 to 8,000 trips/day may be diverted from the Central Entrance corridor as a result of this cross-section conversion. We are concerned that the planning study does not fully account for where these trips will be diverted. For those routes in the transportation network that may receive these diverted trips, the study should determine if any improvements are necessary to those routes to serve this additional traffic. Presumably many of these trips would be diverted onto the local road system which may include routes such as Rice Lake Road (CSAH 4), West Arrowhead Road (CSAH 32), Arlington Avenue (CSAH 90), Joshua Avenue (city street), Maple Grove Road (city street) and Swan Lake Road (city street). St. Louis County believes it is necessary for this planning study to consider the impact of these potential diverted trips on the regional transportation network in order to fairly evaluate the 3-lane corridor option.

Also of concern to St. Louis County is the estimated impact the 3-lane concept may have to the traffic operations performance of the intersection of Central Entrance and Arlington Avenue (CSAH 90). According to the analysis, the estimated level of service in the year 2045 for this intersection is estimated to be lower under the 3-lane corridor scenario than the no-build (5-lane corridor) scenario (level of service D versus C). If no trips are diverted under the 3-lane corridor scenario, the level of service for this intersection is estimated to be reduced to a failing grade (level of service F). See the following figure excerpt from a presentation to the planning study steering committee.

|  | Arlington Avenue        |                 |            |                 |
|--|-------------------------|-----------------|------------|-----------------|
|  | Signalized Intersection |                 | Roundabout |                 |
|  | LOS                     | Delay (seconds) | LOS        | Delay (seconds) |
| 2045 No-Build                              | C                       | 27.9            | C          | 21.5            |
| 2045 Build (3-lane)                        | D                       | 37.3            | D          | 27.1            |
| 2045 Build (3-lane) – Sensitivity Analysis | F                       | 90.4            | F          | 187.9           |

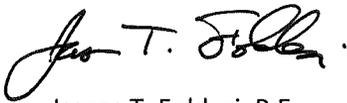
Other general concerns/questions that St. Louis County has regarding the 3-lane corridor concept.

1. Central Entrance serves as a primary access to the Duluth hospital systems from the City of Hermantown and areas north and northwest. A reduction in the corridor capacity likely would increase the travel time to the hospitals, especially if these trips are diverted to less direct routes.
2. Central Entrance is one of five (5) routes that have capacity to serve as an evacuation corridor for the downtown area. Because of Duluth's unique topography, there are limited transportation resources to serve as evacuation routes. A reduction in the corridor capacity may eliminate Central Entrance from the limited resources of evacuation routes.
3. For those trips diverted from Central Entrance to other routes to access the downtown Duluth area, this would have an effect of increasing the regional vehicle-miles-traveled (longer distance to travel to the same destination) thereby increasing fuel use and vehicle emissions.
4. Central Entrance likely would experience greater congestion thereby resulting in more idled vehicles and vehicle emissions, including buses (transit). In addition, greater congestion would reduce available gaps for pedestrians and bicyclists to cross Central Entrance.
5. Central Entrance is functionally classified as a Principal Arterial. According to the Federal Highway Administration, the function of an urban principal arterial is to:
  - a. Serve major activity centers, highest traffic volume corridors and longest trip demands
  - b. Carry high proportion of total urban travel on minimum of mileage
  - c. Interconnect and provide continuity for major rural corridors to accommodate trips entering and leaving urban area and movements through the urban area
  - d. Serve demand for intra-area travel between the central business district and outlying residential areas
6. Central Entrance is connected to Miller Trunk Highway (US 53) and Mesaba Avenue (MNTH 194) which are both four-lane divided facilities. A 3-lane concept would not provide continuity.
7. As explained at the last MIC meeting, the corridor segments at the extreme north and south end of the study area will be recommended to remain as 5 lanes. If the middle segments were to go to 3 lanes, this would create permanent lane merges on both directions. We have all experienced what happens with traffic on Central Entrance today with lane closures. It does not seem possible that the public will accept this geometric configuration being purposefully constructed at taxpayer expense and put in place on a permanent basis.

St. Louis County supports all modes of transportation and is in full support of many of the concepts put forth in this study that will benefit bicycles, pedestrians and transit. We do not support the intentional devaluation of existing modes of traffic (motor vehicles, freight and transit) that actually generate most of the revenue used to pay for these projects. In summary, this letter will serve as St. Louis County's concerns regarding the proposed 3-lane corridor concept for the Central Entrance Transportation Plan and ask that you incorporate it into the formal study document. If you have any questions or requests for clarification, please contact me at [foldesj@stlouiscountymn.gov](mailto:foldesj@stlouiscountymn.gov).

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Foldes".

James T. Foldes, P.E.  
Public Works Director/Highway Engineer  
St. Louis County

Cc:

Matt Hemmila, Deputy Public Works Director, St. Louis County  
Victor Lund, Traffic Engineer, St. Louis County  
Duane Hill, Mn/DOT District Engineer, District 1  
Cindy Voigt, City Engineer, City of Duluth