

Minnesota United MLS Stadium and Surrounding Mixed-Use Urban Village Alternative Urban Areawide Review Update



Prepared for:
City of Saint Paul, MN

August 2021

Prepared by:
Stantec Consulting Services Inc.
SRF Consulting Group, Inc.

Minnesota United MLS Stadium and Surrounding Mixed-Use Urban Village Alternative Urban Areawide Review (AUAR) **Update**

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City of Saint Paul, MN

By



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December 2022

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1.0 INTRODUCTION

The MN United Stadium and Mixed-Use Urban Village Alternative Urban Areawide Review (AUAR) study area is 34.43 acres, located just north of Interstate 94 in the City of Saint Paul, Ramsey County, MN. The AUAR area is bounded by University Avenue to the north, Snelling Avenue to the west, Pascal Street to the east, and St. Anthony Avenue to the south (see Figure 1).

As the Responsible Governmental Unit (RGU), the City of Saint Paul adopted the MN United Stadium and Mixed-Use Urban Village AUAR and Mitigation Plan on August 9, 2016 (2016 AUAR). The AUAR evaluated the 34.43-acre project site and the proposed development activities within this area. Pursuant to Minnesota Rules, part 4410.3610, subpart 7, an AUAR and plan for mitigation must be revised every five years until all development in the study area has received final development approval. Since the study area has not been fully developed, the purpose of this document is to update the AUAR pursuant to Minnesota Rules.

This report is the required update to the 2016 AUAR and includes information on development activities completed to date and an updated mitigation plan. The 2016 AUAR still applies to those items that have not been completed, and those items are carried forward in this document. The 2016 AUAR can be accessed at stpaul.gov -> departments -> planning and economic development -> allianz-field -> snelling-midway redevelopment site -> environmental review.

This update also references a potential new development scenario. This potential new development scenario is variously described in this update as "Scenario 2" or, most often, "2020 Anticipated Development Scenario." Although the Proposer, Snelling-Midway Redevelopment, LLC has not yet formally proposed this new scenario, the Proposer presented an underlying vision of the new scenario to RGU staff in documents dated July 2020. However, as of the date of this update, no formal amendments to the Snelling Midway Redevelopment Site Master Plan, dated May 24, 2016, have been submitted by the Proposer. Accordingly, the 2016 Snelling Midway Redevelopment Site Master Plan continues to be in effect.

Should the Proposer submit redevelopment applications under a new development scenario, the RGU will evaluate whether the applications are consistent with the 2016 Snelling Midway Redevelopment Site Master Plan or will require amendments to the 2016 Master Plan. The RGU reviews Master Plan amendments under Saint Paul Legislative Code Section 66.344. Although only preliminary, the RGU staff assessment of the potential new development proposal provided by the Proposers in July 2020, is that this new development proposal, with its underlying development intensities, is consistent with the overall development scenarios examined under the 2016 AUAR.

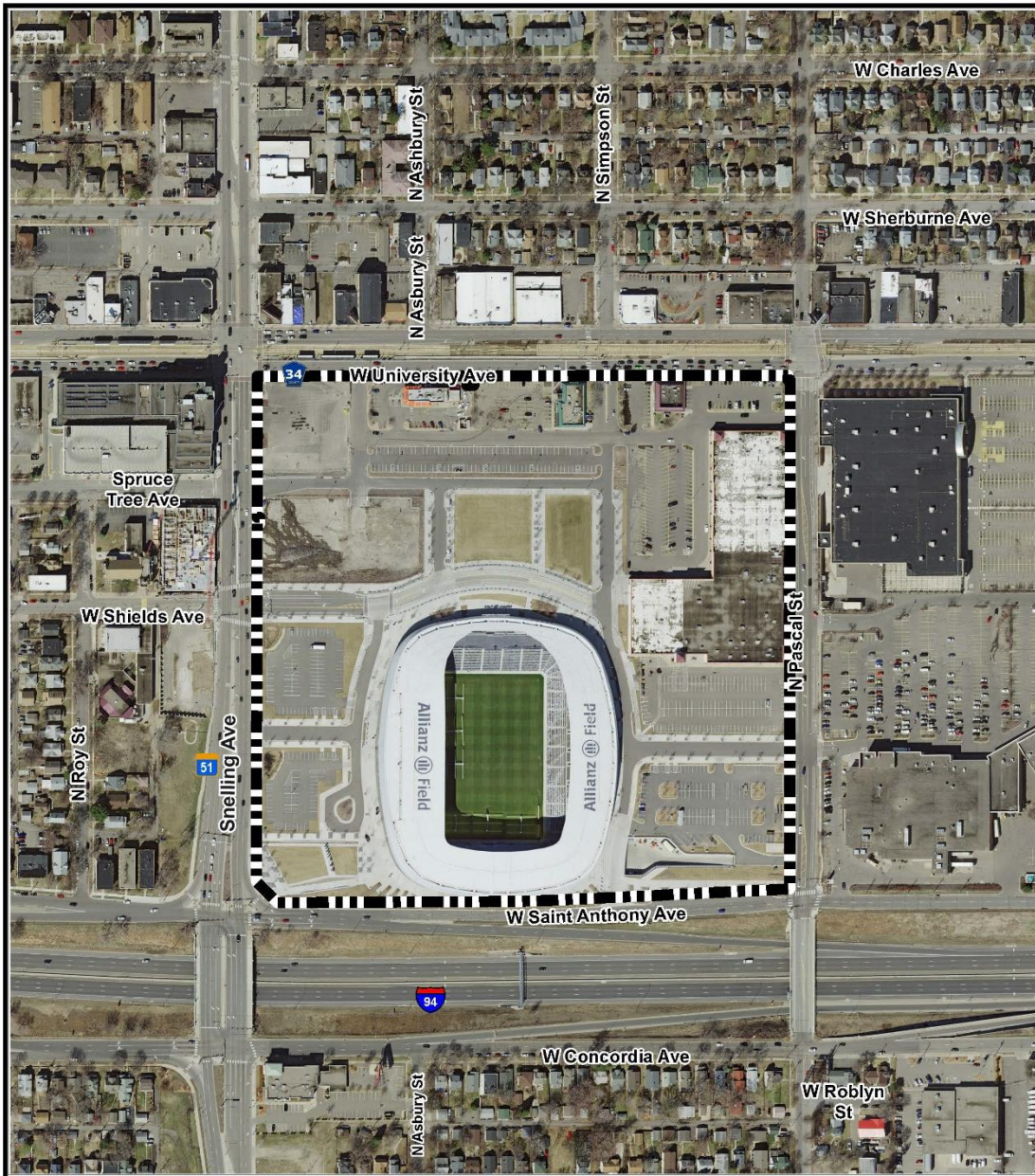
As the entity leading the development activities within the AUAR project area, Snelling-Midway Redevelopment, LLC and Mortenson Construction have been cooperating partners on the AUAR update. Mortenson / Snelling-Midway Redevelopment, LLC has coordinated with the City on reviews of development projects throughout the previous five-year period and provided



information to the City regarding projected future development within the 34.43-acre project site.



Figure 1-1: AUAR Study Area



AUAR Boundary



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1. Project Title

Minnesota United MLS Stadium and Surrounding Mixed-Use Urban Village

2. Proposers

Snelling-Midway Redevelopment, LLC – Proposer for Mixed-Use Urban Village

Contact person William McGuire
Title Chief Manager
Address 4150 Olson Memorial Highway, Suite 300
City, State, Zip Golden Valley, MN 55422
Phone 612.720.3943
E-mail wwmcguire@gmail.com

MUSC Holdings, LLC – Proposer for completed Minnesota United MLS Stadium

Contact person: William McGuire
Title: Chairman
Address: 4150 Olson Memorial Highway, Suite 300
City, State, Zip: Golden Valley, MN 55422
Phone: 612.720.3943
E-mail: Bill.M@mnufc.com

3. Responsible Governmental Unit (RGU)

City of Saint Paul
Contact Person Josh Williams
Title Principal Planner
Address 25 W. 4th Street
City, State, ZIP Saint Paul, MN 55102
Phone 651.266.6659
Fax 651.266.6549
E-mail Josh.Williams@ci.stpaul.mn.us

4. Reason for EAW Preparation

Not applicable to an AUAR. Minnesota Rules Chapter 4410.3610 Subpart 5a requires additional procedures when certain large specific projects are reviewed. Minnesota Rules Chapter 4410.4300 Subpart 34 pertains to this project: Sports or entertainment facilities. The Scoping Environmental Assessment Worksheet (EAW) published February 22, 2016 was prepared as a scoping document to guide this AUAR.

5. Project Location

County Ramsey
City Saint Paul
PLS Location: NWSW342923 (NW ¼ of SW ¼ of Section 34 of Township 29N Range 23W)
Watershed: Mississippi River Twin Cities (07010206), Capitol Region Watershed District
GPS Coordinates: Approx. center of site is Latitude 44.98382 degrees North, Longitude 93.16400 degrees West



Tax Parcel Number: 342923320001, 342923320005, 342923320006, 342923320009, 342923320013, 342923320014, 342923320015, 342923320016, 342923320017, 342923320018, 342923320019, 342923320020, 342923320021, 342923320022, 342923320023

All required maps and additional figures displaying relevant information are found in Appendix A.

6. Project Description

a. Provide the brief project summary to be published in the *EQB Monitor*.

MUSC Holdings, LLC (one of the Proposers) has completed the development of a 20,000-seat professional soccer stadium with expansion and standing room capacity to accommodate a maximum of 25,500 visitors (plus 500 employees) located within the AUAR area. Snelling-Midway Redevelopment, LLC proposes to develop the remainder of the AUAR area in a phased manner to accommodate mixed-use development including retail and service commercial, hospitality, residential, office, and public and private open space. The AUAR area is bounded by University Avenue to the north, Snelling Avenue to the west, Pascal Street to the east, and St. Anthony Avenue to the south.

b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion include a description of the existing facility. Emphasize: 1) construction, operation methods and features that will cause physical manipulation of the environment or will produce wastes, 2) modifications to existing equipment or industrial processes, 3) significant demolition, removal or remodeling of existing structures, and 4) timing and duration of construction activities.

MUSC Holdings LLC has completed a 20,000-seat stadium on the southerly portion of the site. This portion of the site is used primarily as the home stadium for Minnesota United to host professional soccer games. The stadium has been used for college, high school and youth soccer games and has the potential to be used for other music and entertainment events. The remainder of the AUAR area, controlled by Snelling-Midway Redevelopment LLC, is proposed to be redeveloped in a phased manner to accommodate a mixed-use development including retail and service commercial, hospitality, residential, office, and public and private open space.

Redevelopment of the AUAR area will result in the creation of a street grid internal to the AUAR area, new or upgraded utilities to serve the AUAR area, and potential limited improvements to infrastructure in the immediate vicinity of the AUAR area.

- 1) Typical urban development methods will be used and all wastes from construction will be reused or disposed of according to all applicable city, state, and federal regulations.
- 2) Any and all existing equipment will be removed from the site and disposed of according to all applicable city, state and federal regulations.
- 3) Over a period of time to be determined by market demand, existing structures will



be demolished and replaced by new structures on the project site. All construction wastes will be removed and disposed of off-site according to all applicable city, state and federal regulations.

- 4) At this time, redevelopment of the remainder of the AUAR area is estimated to be accomplished in multiple phases over the next five to ten years or longer, depending on market conditions.

c. Project magnitude

The 2016 AUAR analyzes two development scenarios within the 34.43-acre AUAR area. Scenario 1 represents redevelopment of the AUAR area in a manner consistent with the City's Comprehensive Plan. This scenario anticipates full buildout of the AUAR area with a mixture of office, commercial, and residential uses and public open space. Buildings range in height from two to ten stories, and the majority of parking provided is above-ground structured parking. Existing streets are extended and/or new streets are created to develop a new street grid within the AUAR area. Proposed land use square footages, building heights, and parking spaces are presented in Table 1-1 below. The buildout presented in Appendix A, Figure 6-1 has a Floor Area Ratio of 1.20 and a Parking Ratio of 1.82.

Table 1-1. Scenario 1 Land Use Intensity

Total Project Acreage	34.43 acres
Number and type of residential units	246,662 square feet, multi-family
Commercial building area	1,200,283 square feet office 246,662 square feet retail
Industrial building area	No industrial uses are planned for the AUAR area.
Entertainment building area	No entertainment uses are planned for the AUAR area.
Structure height(s)	2 – 10 stories
Parking spaces (total site)	3,288 spaces

Scenario 2 describes two options: the 2016 Snelling Midway Redevelopment Site Master Plan and the Proposers' 2020 Anticipated Development Scenario for buildout of the AUAR area. The site plan and program for the 2020 Anticipated Development Scenario are depicted in Appendix A, Figures 6-2 through 6-4. This 2020 Anticipated Development Scenario includes a 20,000-seat stadium with expansion capacity to accommodate 25,500 seats. In addition to the stadium, the Proposers intend to fully develop the remainder of the site with a mixture of office, retail, housing, hotel, and entertainment uses. The majority of parking provided is above-grade, with below-grade structured parking included in mixed-use building structures. Existing streets are extended and/or new streets created to develop a new street grid within the site. Proposed land use square footages, building heights, and parking spaces are presented in Table 1-2.



As of the date of this AUAR update, the Proposers have not applied to amend the 2016 adopted Snelling Midway Redevelopment Site Master Plan. This AUAR update uses the Proposer’s 2020 Anticipated Development Scenario as it represents the most up-to-date information for the project area. However, use of 2020 Anticipated Development Scenario for the purpose of updating the AUAR does not in any way represent its endorsement or acceptance of any related amendments to the 2016 Adopted Snelling Midway Redevelopment Site Master Plan by the RGU that may be necessitated under the 2020 Anticipated Development Scenario. However, for the purpose of updating the 2016 AUAR, the 2020 Anticipated Development Scenario can represent a reasonable development scenario provided that total development under it would not exceed the maximum development levels assumed in the 2016 AUAR. Therefore, provided a development proposal is submitted under the 2020 Anticipated Development Scenario and found by RGU staff to be consistent with development assumptions under the 2016 AUAR, the 2016 Snelling Midway Redevelopment Site Master Plan and this AUAR update, such a proposal could be approved by the RGU based upon this AUAR update and its environmental analysis assumptions.

Table 1-2 summarizes the land use intensity of the two options for Scenario 2: the 2016 Snelling Midway Redevelopment Site Master Plan and the 2020 Anticipated Development Scenario.

Table 1-2. Land Use Intensity for Scenario 2 Options

	2016 Snelling Midway Redevelopment Site Master Plan	2020 Anticipated Development Scenario
Total Project Acreage	34.43 acres	34.43 acres
Number and type of residential units	620 multi-family units	948 multi-family units
Hotel building area	400 rooms	100 rooms
Commercial building area	Office: 1,000,000 sq. ft. Retail: 421,100 sq. ft., including: 800 seat cinema 50,000 square feet fitness club 39,000 square feet bowling alley	Office: 802,680 sq. ft. Retail: 241,424 sq. ft.
Industrial building area	No industrial uses are planned for the AUAR area.	No industrial uses are planned for the AUAR area.
Entertainment building area	20,000 seat stadium (with capacity to expand to 25,500)	Completed: 20,000 seat stadium (with capacity to expand to 25,500)
Structure height(s)	70-290 feet	35-230 feet



Parking spaces (total site)	4,680 spaces	3,204 spaces
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d. Explain the project purpose; if the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

The new stadium is the home of major league soccer in Minnesota and serves as a catalyst for redevelopment. The proposed surrounding mixed-use urban village will provide new property tax revenue and economic vitality, as well as community gathering places, housing and shopping areas, consistent with the vision contained in the City’s Comprehensive Plan.

The AUAR area is strategically located halfway between the central business districts of Saint Paul and Minneapolis. With the Green Line LRT running along its northern boundary (University Avenue) and the A-Line BRT corridor running along its western boundary (Snelling Avenue), the site’s location makes it both one of the highest priority sites for transit-oriented development (TOD) in the region and a top redevelopment opportunity site. A portion of the AUAR area, known previously as the “Bus Barn,” has been under-utilized for several years. The adjacent shopping center was damaged by fire in the civil unrest following the murder of George Floyd in 2020 and was recently demolished. The site is well-positioned and planned to support higher density uses. The City and region will benefit from realizing the TOD potential at this key site.

e. Are future stages of this development including development on any other property planned or likely to happen? Yes No

For the purposes of this environmental review update, both the 2016 adopted Master Plan scenario and the 2020 Anticipated Development Scenario are analyzed at full buildout. Further development in the AUAR area expected to occur in phases. The stadium has been built with 20,000 seats and is designed to expand to accommodate a maximum of 25,500 seats (plus 500 employees). The adjacent mixed-use development will be phased in over time as market conditions allow.

f. Is this project a subsequent stage of an earlier project?

Yes.

7. Cover types

Estimate the acreage of the site with each of the following cover types before and after development.

The existing acreage of green space, impervious surfaces, and above-ground development (e.g., buildings) within the AUAR area was determined based on aerial photography and Geographic Information System (GIS) tools. In addition, acreages of post-construction land cover types were determined by utilizing the Proposed Land Usage plan provided by Populous (see 2020 Anticipated Development Scenario in Figure 3-1). Both development scenarios involve full buildout of the AUAR project area, including the conversion of existing impervious surfaced areas to green space. Both scenarios will result in similar post-construction land cover



types. The 2020 Anticipated Development Scenario would result in more maintained green space compared to the 2016 Master Plan.

There are no major anticipated changes to this AUAR category.

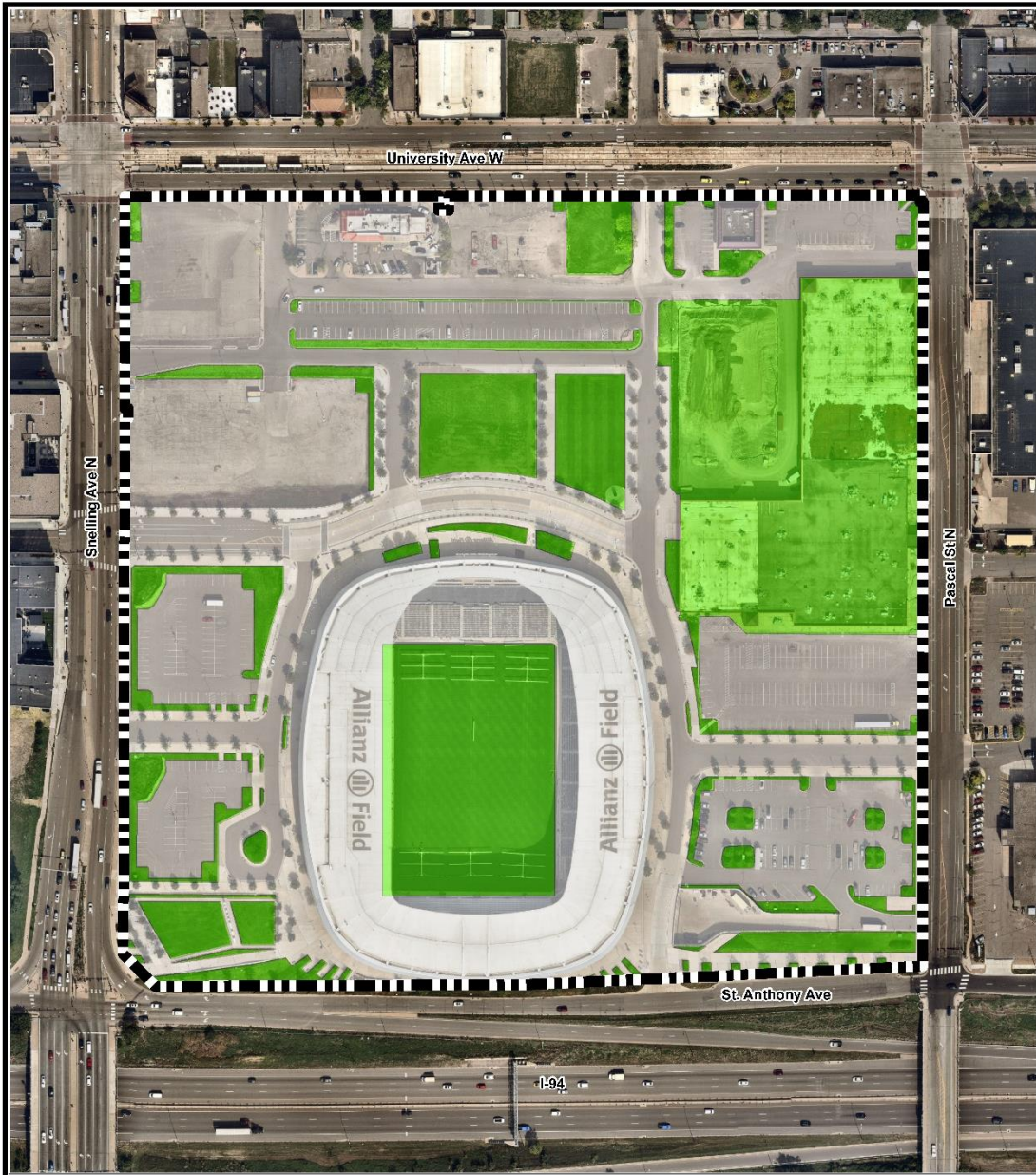


Table 1-3. Pre- and post-construction land cover types for Scenario 2 Options

Land Cover Type	Scenario 2 (2016 Snelling Midway Redevelopment Site Master Plan)			Scenario 2 (2020 Anticipated Development Scenario)		
	Impervious (Buildings & pavement)	Maintained Green Space	Total	Impervious (Buildings & pavement)	Maintained Green Space	Total
Existing Land Cover (acres)	33.78 acres	0.65 acres	34.43 acres	27.9 acres	6.5 acres	34.4 acres
Percent of AUAR Area	98.1%	1.9%	100.0 %	81.1%	18.9%	100.0%
Post Construction Land Cover (acres)	30.75 acres	3.68 acres	34.43 acres	31.16	4.71 acres	35.87 acres
Percent of AUAR Area	89.3%	10.7%	100.0 %	86.8%	13.1%	100.0%



Figure 1-2: Existing Land Cover



Existing Land Cover



8. Permits and approvals

Many of the permits originally required for the site have been obtained during the construction process for the stadium. In some cases, new permits will be required for the remaining phases of redevelopment.

Table 1-4. Summary of Required Permits & Status Update

Agency / Unit of government	Type of Approval	2016 Status	2020 Update
US Fish and Wildlife Service	Consultation regarding Section 7 of the Endangered Species Act (only required if project is federally funded)	Consultation not necessary at this time.	No change
MnDNR	Temporary Water Appropriation Permit for construction dewatering	To be applied for	Issued 5-15-2017. New permit will be needed if dewatering is needed during future construction
MPCA	Construction Site Stormwater Permit	To be applied for	New permit for additional phases will be required
	Notification of Intent to Perform a Demolition	To be applied for	Notification for Midway Mall sent 10-2-17, notices included in file for this along with Big Top and the old Bank. Approved and completed. Notification for Big Top along University Avenue and the remainder of Midway Mall were sent on 6-1-21. Additional demolition permits will be required for future demolitions.
MnDOT	Driveway Access Permit & Utility Permits	To be applied for	Approved and completed. New permits for additional phases will be required
	Drainage permit	To be applied for	Approved and completed. New permit for additional phases will be required



Agency / Unit of government	Type of Approval	2016 Status	2020 Update
	Permit for use of or work within Snelling Ave. ROW	To be applied for	Approved and completed. New permit for additional phases may be required
MN Dept. of Health	Water extension permit	To be applied for	Approved and completed. New permit for additional phases will be required
	Notification of Asbestos Related Work	To be applied for	Initial Notification of Asbestos Related Work submitted by Mavo Systems, Inc. (Mavo) on 9/18/17, Amendment #1 to the notification submitted by Mavo on 10/4/17, Amendment #2 on 10/6/17, and Amendment #3 on 10/24/17. MDH Asbestos-Related Project Permit (Permit No. 48996) issued on 9/20/17.
Minnesota State Historic Preservation Office	Determination of an Area of Potential Effect	To be submitted	Completed for construction of the Stadium. Phase II Evaluations still need to be completed. New approvals for additional phases will be required.
	Determination for NRHP listing eligibility of properties within the Area of Potential Effect		
Metropolitan Council	Sewer extension permit	To be applied for if required.	Approved and completed. New permit for additional phases will be required
	Contaminated groundwater discharge permit to sewer	To be applied for	Approved 5-25-2017. New permit for additional phases will be required
	Sewer Permit to Connect	To be applied for	Approved and completed. New permit for additional phases will be required
City of Saint Paul	AUAR Approval	Anticipated to be submitted to EQB July 2016	Sent to EQB August 2016. Approved August 9, 2016



Agency / Unit of government	Type of Approval	2016 Status	2020 Update
	Approval of Master Plan	Anticipated August 2016	Approved, August 17, 2016
	Site Plan Review	Anticipated August 2016	Approved August 17, 2016
	T4 Zoning Amendment	Anticipated August 2016	Adopted August 17, 2016
	Preliminary Plat	Anticipated August 2016	Approved August 17, 2016
	Development Agreements	Anticipated August 2016	Executed and delivered
	Final Plat	Anticipated Fall 2016	Approved
	Sign Permit	To be applied for	Approved and completed
	Building Permit	To be applied for	Approved and completed
	Excavation and Grading Permit	To be applied for	Grading / Utilities / Demo Permits all Applied for in April 2017. Approved and completed. New permits for additional phases will be required
	Certificate of occupancy	To be applied for	New permits for additional phases will be required
	Parkland Dedication	To be applied for as part of platting	A Privately Owned Public Space (POPs) parkland agreement for the Great Lawn on Block D was approved. Parkland dedication to be applied for as part of platting, for the remainder of parkland on Block D (identified in the 2016 Master Plan as Midway Square).
	Ordinance Permit for Construction of Public Improvements	To be applied for	Applied 7.13.16; Approved. New permits for additional phases may be required
	Right of Way Excavation and Obstruction Permits	To be applied for	Applied 7.13.16; Approved. New permits for additional phases may be required



Agency / Unit of government	Type of Approval	2016 Status	2020 Update
	Contaminated groundwater discharge permit to city sewer	To be applied for if required	Sanitary sewer discharge request form submitted to Metropolitan Council Environmental Services (MCES) by Mortenson on 5/9/17. Initial MCES approval (Approval No. 3621) granted on 5/25/17 and amended discharge approval to extend discharge end date granted by MCES on 8/29/17.
	Sewer Connection, Repair and Abandonment Permits	To be applied for	Approved and completed. New permits for additional phases may be required
	Variance of minimum Floor Area Ratio for a soccer stadium	Applied 7-13-16	Approved. No further action required
	Variance to allow surface parking on a separate lot that may not be shared with another use	Applied 7-13-16	No further action required
Saint Paul Regional Water Services	Plumbing permits	To be applied for	Issued 7-14-2017, Closed 2-13-2019. New permits for additional phases will be required
Capitol Region Watershed District	Watershed District Permit for stormwater management and for erosion and sediment control	To be applied for	Permit issued 5-18-17, status listed as Construction Complete. New permits for additional phases will be required



2.0 EXISTING CONDITIONS

The 2016 AUAR identified projects that were considered Phase I of the development and included the stadium, park space, and parking. Since completion of the 2016 AUAR, Snelling-Midway Redevelopment LLC has been progressing with the development items identified in Phase 1. These project components have been completed by Snelling-Midway Redevelopment LLC.

Recent Development

MLS Soccer Stadium

The soccer stadium is the only new development that has taken place within the AUAR study area since the 2016 Final AUAR. Construction of the 346,000 square foot stadium was completed in April of 2019 and takes up approximately one quarter (23.0 percent) of the 34.43-acre site. The stadium is home to Minnesota United FC Major League Soccer and accommodates 20,000 seats. It was designed by Populous, Inc., with M.A. Mortenson Company as the general contractor.

Adjacent Projects – New Construction

The Pivot - The Pivot Midway is a new 6-story mixed-use building located northwest of the soccer stadium across Snelling Avenue. The project consists of street-level retail space and 122 market rate units complete with contemporary amenities, including underground parking and bicycle storage.

The Pitch, Walgreens, and Bremer Bank – The new construction mixed-use building is completed or substantially completed, and will replace the previous Bremer Bank at this location. It will include both the Walgreens and bank on the ground floor, with residential units above.

Table 2-1. Summary of New Development Adjacent to the AUAR Study Area

Project Name	Address	Category & Type	Residential Units	Anticipated Completion
The Pivot	455 Snelling Ave	Mixed Use: Ground level commercial, residential above	122	March 2021
The Pitch, Walgreen's, Bremer Bank	427 N Snelling Ave	Mixed Use: Ground level commercial, residential above	160	August 2021

Adjacent Projects – Renovations

Several nearby businesses have recently undergone renovations, including two local dining/drinking establishments, and the transformation of the Midway Walmart into an At Home, a home décor superstore. It appears that Gibson's is no longer in operation.



- Midway Saloon (1567 University Ave W) – completion March 2019
- At Home (1450 University Ave W) – completion Spring 2021
- Gibson's (1553 University Ave W) – completion March 2019

Recent Property Damage

Following the May 25, 2020 murder of George Floyd in Minneapolis, the Saint Paul Midway neighborhood was severely impacted by riots, looting, and fires. Several buildings located in and near the AUAR project area had property or fire damage. Within the AUAR project area, 4 buildings had property damage and 20 businesses had fire damage, for a total of 24 incidents to individual businesses. The Midway area along University Avenue between Pierce Street (2 blocks west of Snelling) and Hamline Avenue had 53 incidents of reported property or fire damage. The main shopping center just to the north and east of the stadium and the Big Top Liquor Store building, both within the AUAR area, were damaged by fire. Both the Big Top Liquor Store and the main shopping center have since been demolished.



3.0 DEVELOPMENT SCENARIOS

There have been minor changes to the development scenarios since the original 2016 Master Plan. The total square footage for the components that have been completed to date are consistent with the 2016 AUAR and Mitigation Plan.

Table 3-1. AUAR Development Scenarios

	Scenario 1	Scenario 2 Options	
	Comprehensive Plan	2016 Snelling Midway Redevelopment Site Master Plan	2020 Anticipated Development Scenario
Description	Redevelopment consistent with the City of Saint Paul's adopted Comprehensive Plan. Full buildout of the AUAR area with a mixture of office, commercial, and residential uses and public open space.	The Proposers' intended program for buildout in the AUAR area	The Proposers' currently Anticipated Development Scenario for buildout in the AUAR area
Total Project Acreage	34.43 acres	34.43 acres	34.43 acres
Number and type of residential units	246,662 square feet, multi-family	620 multi-family units	948 multi-family units
Hotel building area	N/A	400 rooms	100 rooms
Commercial building area	Office: 1,200,283 sq. ft. Retail: 246,662 sq. ft.	Office: 1,000,000 sq. ft. Retail: 421,100 sq. ft., including: 800 seat cinema 50,000 square feet fitness club 39,000 square feet bowling alley	Office: 802,680 sq. ft. Retail: 241,424 sq. ft.
Industrial building area	No industrial uses are planned for the AUAR area.	No industrial uses are planned for the AUAR area.	No industrial uses are planned for the AUAR area.
Entertainment building area	No entertainment uses are planned for the AUAR area.	20,000 seat stadium (with capacity to expand to 25,500)	Completed: 20,000-seat stadium (with capacity to expand to 25,500)
Structure height(s)	2 – 10 stories	70-290 feet	35-230 feet



	Scenario 1	Scenario 2 Options	
	Comprehensive Plan	2016 Snelling Midway Redevelopment Site Master Plan	2020 Anticipated Development Scenario
Parking spaces (total site)	3,288 spaces	4,720 spaces	Below: 1,375 spaces Above: 1,829 spaces Total spaces: 3,204
Park, Open Space, Green Space (Note that there is a distinction between each)	1.35 acres of park (58,805 sq. ft)	Open space: 4.2 acres (182,952 sq. ft) ¹	Open space: 6.46 acres Green space (includes soccer field): 4.71 acres
Transportation	No internal street network	Internal grid street network	Internal grid street network
¹ Number is approximate and based on approved Master Plan (2016), as shown in Figure 3-1. Green space not specified in 2016 Master Plan			

Table 3-2 and Figure 3-1 summarize the changes between the 2016 Master Plan for the site and the 2020 Anticipated Development Scenario:



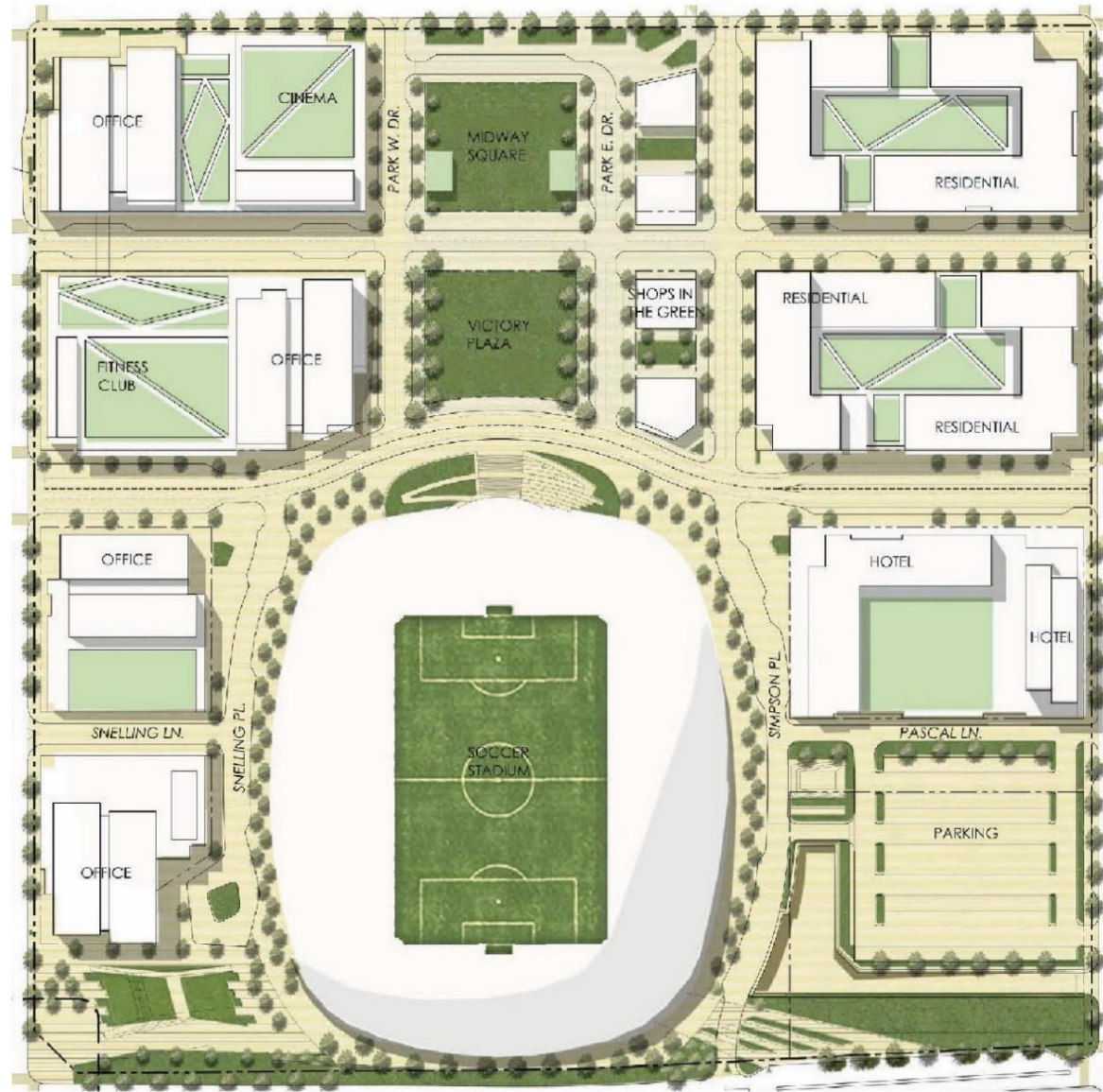
Table 3-2. Summary of Changes between 2016 Master Plan and 2020 Anticipated Development Scenario

	Summary of Change
Total Project Acreage	No change
Number and type of residential units	Increase by 328 multi-family units
Hotel building area	Decrease by 300 hotel rooms
Commercial building area	Office: Decrease by 197,320 sq. ft. Retail: Decrease by 179,676 sq. ft.
Industrial building area	No change
Entertainment building area	No change
Structure height(s)	Maximum height decrease by 60 ft.
Parking spaces (total site)	Decrease by 1,516 spaces
Park and Open Space	The proposed removal of Midway Square and replacement with redesigned open space on Block D decreases the park and open space by 0.02 acres. Overall, the total open space on the site will increase by 2.26 acres. Note: parks are considered a subset of open space, therefore not all open spaces are parks.
Transportation	No change. Developer to provide additional 10 ft. of right-of-way along Snelling between Shields and University.

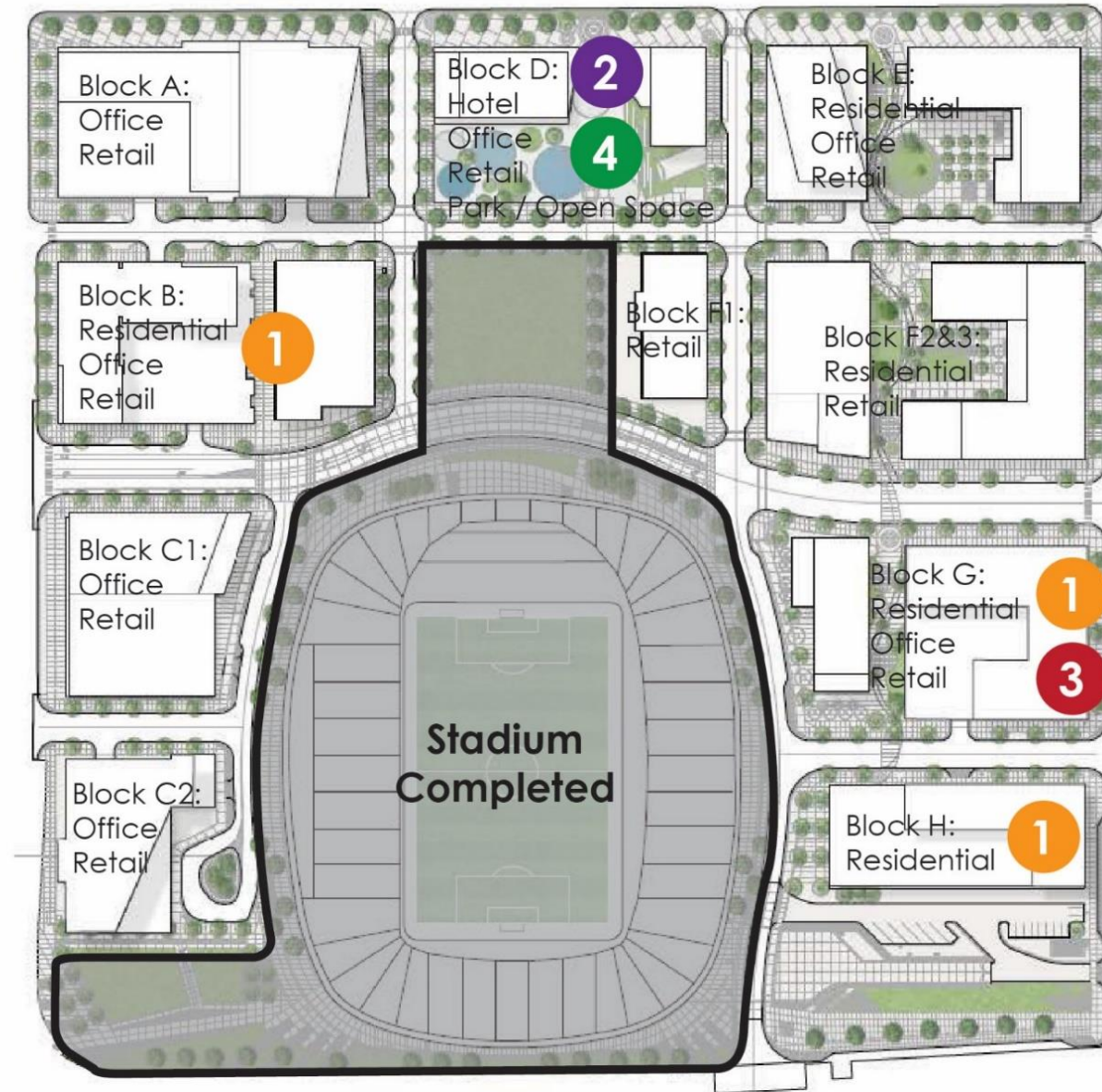


Figure 3-1. Scenario 2 Land Use Intensity Comparison: 2016 Master Plan vs. 2020 Anticipated Development Scenario

Master Site Plan (2016)



Proposed Master Site Plan (2020)



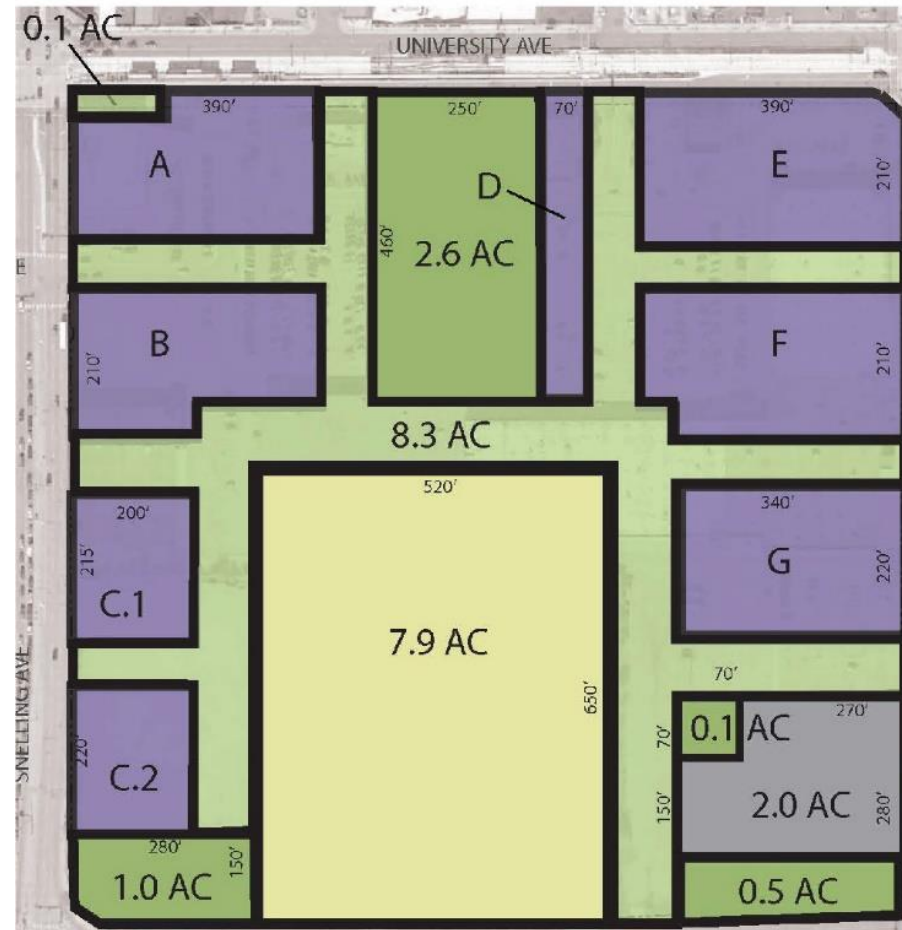
- 1 Residential: Increase by total of 328 multi-family units. Updated master plan includes residential on Blocks B, G, and H
- 2 Hotel: Decrease by total of 300 rooms. Location moved from Block G to Block D
- 3 Commercial building area. Updated master plan includes commercial on Block G
Office: Decrease by total of 197,320 sq. ft
Retail: Decrease by total of 179,576 sq. ft

- 4 Park/Open Space: Decrease by 0.02 acres on Block D
Total Open Space: Increase by 2.26 acres.
- Total Parking spaces: Decrease by 1,516 spaces
Structure heights: Maximum height decrease by 60 feet

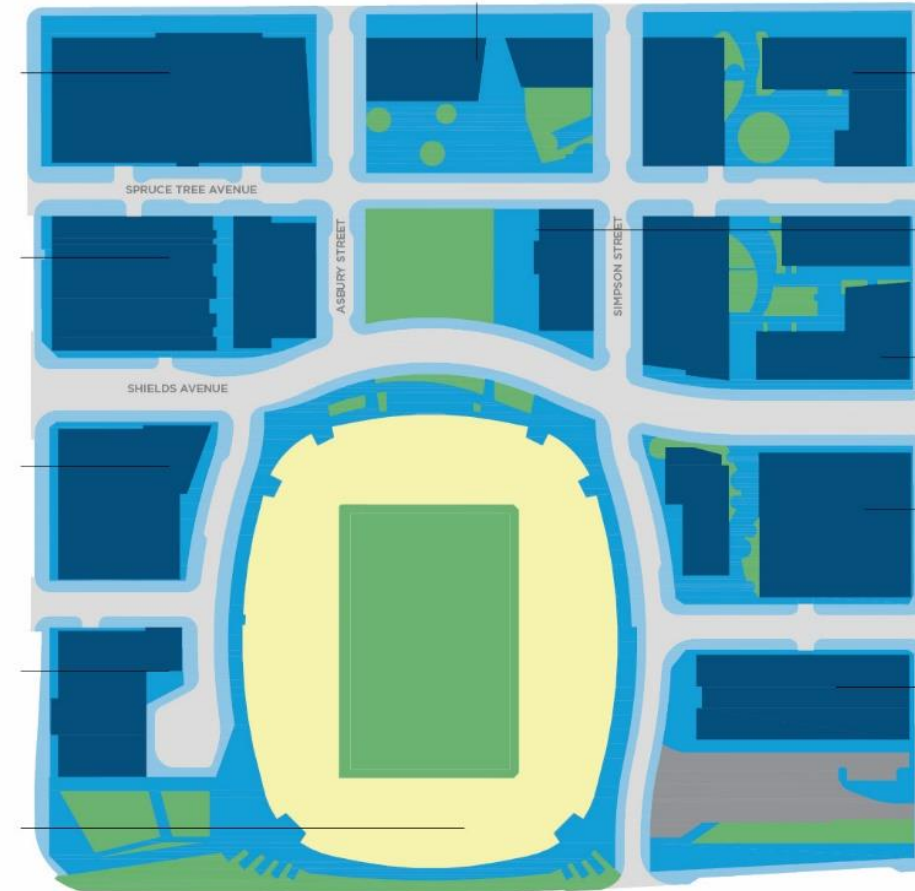


Figure 3-2. Scenario 2 Open Space & Green Space Comparison: 2016 Master Plan vs. 2020 Anticipated Development Scenario

Master Site Plan (2016)



Proposed Master Site Plan (2020)



PROPOSED LAND USAGE

OPEN SPACES	4.2 AC
STREET	8.3 AC
STADIUM	7.9 AC
SURFACE PARKING	1.9 AC
TOTAL PUBLIC REALM	22.3 AC (64.8%)
DEVELOPABLE BLOCKS:	12.1 AC (35.2%)

Green Space	4.71 AC
Open Space (non-green space)	6.46 AC
Public Pedestrian ROW	5.19 AC
Building Footprint	9.88 AC
Stadium	4.5 AC
Parking	0.76 AC
Road	4.37 AC

Total Open Space: 11.17 Acres
 Total Public Realm: 26 Acres (72%)
 Total Developable Land: 9.88 Acres (28%)



4.0 IMPACT ANALYSIS UPDATES

Each AUAR category is included in the impact analysis below. Several categories have anticipated change in impacts, and there is only one AUAR category without any recommended changes to mitigation (Geology)..

4.1 LAND USE

Comprehensive Plan

During the 2016 evaluation, the AUAR project site was guided as Mixed-Use Corridor by the City of Saint Paul's 2030 Comprehensive Plan. The City of Saint Paul's current Comprehensive Plan for 2040 was not adopted until November 18, 2020, but it also guides the project site as Mixed-Use. The 2016 Final AUAR noted that the 2030 Comprehensive Plan identified the Mixed-Use Corridor as appropriate for a broad mix of uses at the highest densities allowed outside of the downtown core. Policies in the Plan call for these areas to accommodate growth, support transit use and walking, and provide diverse housing options and a mix of commercial uses that support transit. A Comprehensive Plan amendment was not required for the development project. To date, the developer has not proposed any changes to development outside of those identified within the scenarios, and at this time it is not anticipated that new comprehensive plan amendments will be required for the development project to proceed.

The 2016 AUAR noted the Snelling Station Area Plan (SAP), which was adopted as an addendum to the City's 2030 Comprehensive Plan. With regard to the AUAR area, the SAP calls for a land use strategy that focuses on connectivity, design, and transit and for increasing development intensity in the area. The SAP also recommends these blocks be transformed into a "new urban village" and a transit-oriented development demonstration site. The SAP generally indicates that entertainment-related uses are best located in the southern portion of the AUAR area and specifically identifies entertainment uses as a desired potential use for the bus barn property (p. 27, Policy 4.1.2 e). The entertainment use, specifically the soccer stadium was developed and is currently situated in the southern portion of the AUAR area, approximately 30 feet from the project's southern boundary, St. Anthony Avenue.

Zoning

During the 2016 evaluation, the AUAR project site was zoned T4 Traditional Neighborhood. The Final AUAR noted that the City's zoning code at the time defined traditional neighborhood districts as "intended to foster the development and growth of compact, pedestrian-oriented urban villages." There are four different traditional neighborhood zoning districts, each ranging in intensity and size. T4 is the most intense traditional neighborhood zoning district and allows for high density development, focused on major transit nodes. Principal uses in the T4 zoning district include multi-family residential, commercial, institutional, office, and retail, and in 2016 the T4 district was amended to include outdoor sports and entertainment uses, which allowed for the approval of the stadium. There are numerous design standards in the district that encourage a



traditional urban character and diversity of uses. A full list of requirements for the T4 Traditional Neighborhood zoning district can be found in the City of Saint Paul's Zoning Code §66.300.

Land Use and Zoning Changes Since the 2016 AUAR

The AUAR project site was rezoned to T4M, Traditional Neighborhood with Master Plan, when the master plan was adopted by the City Council in 2016; the principal zoning for the project site, T4, did not change. Though a rezoning of the property was not required for the development project to proceed under either of the original development scenarios, the T-4 zoning district was required to be amended to allow the outdoor sports and entertainment uses. In August 2016, Ordinance 16-25 formally amended Chapters 65 and 66 of the City of Saint Paul Legislative Code pertaining to outdoor sports and entertainment.

The [Snelling Midway Redevelopment Site Master Plan dated April 18, 2016](#) (revised May 24, 2016) is the approved master planning document specific to the AUAR area. All development to date has been consistent with the approved Master Plan. The City of Saint Paul approved all application materials related to development to date, including a stadium site plan review and preliminary plat and final plat. Effective April 1, 2016, the City and MUSC Holdings, LLC entered into the Development Agreement for the construction of the MLS professional soccer stadium, the Great Lawn and surrounding infrastructure in the southern portion of the AUAR area. This development was completed in 2019. During the AUAR update process, there has not yet been an application to amend the Master Plan, however the City has informed the Proposer that amendments to the adopted Master Plan would be necessary to accommodate the 2020 Anticipated Development Scenario.

The developer applied for and was granted two variances associated with development to date. A variance from the minimum floor area ratio for the stadium was approved (1.0 FAR required and 0.19 FAR approved). In addition, a variance to allow surface parking on a separate lot that may not be shared with another use (for the surface parking lot at the corner of Pascal and St. Anthony) was approved. Both variances were granted on August 5, 2016.

The proposer did not dedicate public land as part of the required parkland dedication. The City allowed a privately owned public space (POPS) to satisfy the requirement, which was approved by resolution in November 2017. The 2020 Anticipated Development Scenario changes the amount of parkland proposed on the site. Future parkland dedication requirements will be assessed as part of the platting process.

The Proposers have expressed preliminary interest in constructing an outdoor dynamic display device for the AUAR area. The Proposers state that this dynamic display device would feature various types of programming for display including community night-out movies, showing live performances at community festivals, public service announcements and advertisements, visual art, and live broadcasts of home and away soccer games. The use of such a dynamic display device as proposed is not a permitted use under present zoning regulations. Therefore, zoning code amendments would be needed to allow the use. The outdoor dynamic display device would emit light and noise during day and nighttime hours. If the City Council were to adopt zoning code amendments to permit a dynamic device as proposed, standards and conditions



for the use, which would require a master plan amendment process, to regulate noise, illumination, and brightness to prevent adverse effects, would likely be required.

4.2 GEOLOGIC HAZARDS AND SOIL CONDITIONS

The 2016 AUAR did not anticipate encountering any geological hazards in the AUAR area, and that continues to be the case with this AUAR Update. Item 4.3.2. Groundwater addresses the three mitigation strategies associated with geologic hazards and soil conditions.

4.3 WATER RESOURCES

4.3.1 SURFACE WATERS - WETLANDS, LAKES AND STREAMS

The project site is a fully developed urban area. The 2016 AUAR noted that there are no surface waters (lakes, rivers, streams, or wetlands) within the project area. The AUAR area ultimately drains to the Mississippi River, which is identified as an impaired water with an EPA-approved TMDL on the MPCA 303d Impaired Waters List. Best Management Practices (BMPs) to manage construction stormwater runoff continued to be employed during construction to protect the river from potential runoff associated water quality impacts. **There are no surface water features on the project site and no further measures are needed related to the protection of downstream surface waters beyond those measures identified in the 2016 AUAR.**

4.3.2 GROUNDWATER

The depth to the water table across the AUAR area is generally 25 to 30 feet below land surface. The 2016 AUAR also noted that a discontinuous perched zone of groundwater can be found 10-12 feet below the land surface. During initial demolition and construction activities completed at the site, shallow groundwater was encountered. A Water Appropriations Permit was acquired in May 2017 from the Minnesota DNR to conduct construction dewatering. The dewatering activities were added to the construction SWPPP for the project.

It is possible that shallow groundwater could again be encountered as demolition and construction continues across the project site. If shallow groundwater is encountered, and construction dewatering is required, a temporary dewatering permit will be required from the Minnesota DNR if dewatering exceeds 10,000 gallons per day or one million gallons per year. Additionally, testing of the groundwater should be carried out to determine if the groundwater is contaminated before dewatering activities begin. If the groundwater is contaminated, State and local agency input will be required to select an appropriate discharge location and/or on-site treatment of contaminated water. The construction SWPPP will need to be amended to include the activities in the construction dewatering plan. Best Management Practices (BMPs) will be used for future development to manage construction stormwater runoff. Best practices, such as the use of filter bags, will be employed as needed to ensure sediment laden water is not pumped downstream during construction dewatering.



No additional mitigation measures are needed for the protection of groundwater resources. The measures identified in the 2016 AUAR are still applicable to future stages of demolition and construction at the project site.

4.3.3 WASTEWATER

The project will generate wastewater from the new stadium, homes, offices, and retail businesses. The daily wastewater flows were estimated to be between 265,000 gallons per day and 462,000 gallons per day in the 2016 AUAR. The project components will be connected to existing wastewater sewer located near the project site within Snelling Avenue, University Avenue, and Pascal Street. The City reviewed the estimated wastewater flows for the development as part of the 2016 AUAR and determined that the system and existing infrastructure had capacity to accommodate the proposed wastewater flows. To date the only project component connected to the wastewater system is the Stadium. As only one project component has been completed to date, and it is a sports facility that is only used for sporadic events, the amount of wastewater generated from the project site is below the original estimates.

The upper estimate of wastewater flows for the development was based on the 2016 project master plan. The 2020 Anticipated Development Scenario would result in an increase in the number of residential units at the site combined with a decrease in other development components including a lower number of hotel rooms, less total of office space, and less total retail space (see Section 3.0 for a comparison of development scenarios). Based on the revised development components, the total wastewater generated by the project is anticipated to be 312,458 gallons per day. Future components of the project site that are constructed will be connected to the existing City wastewater sewer in the areas noted adjacent to the site.

The 2020 Anticipated Development Scenario would require amendments to the adopted 2016 Snelling Midway Master Plan, for which the proposer has not yet applied. The analysis of the 2020 Anticipated Development Scenario shows a decrease in wastewater flows from the site of 149,542 gallons per day. The 2016 AUAR identified regional capacity that is more than able to serve this new development. However, the 2016 AUAR also noted that as development progressed in the area, future analysis of the wastewater system, including identification of system upgrades, would be needed to accommodate regional growth. For the AUAR project site, the Stadium has been constructed and connected to the City wastewater system. There have also been redevelopment projects completed to the west of Snelling Avenue that were connected to the local 18-inch sanitary system along Snelling Avenue since 2016 (see Section 2.0). These recent development projects have consumed some of the available capacity of the conveyance system described in the 2016 AUAR. **Adequate capacity in the receiving sanitary sewer lines will be confirmed as part of the site plan review process. The city recommends capacity be confirmed prior to submittal of a site plan for review. Satisfactory availability and capacity are required for site plan approval.**



In 2021, the City installed several sanitary sewer monitoring devices at locations within and near the AUAR project area to provide additional capacity data and information on any potential issues. The City can share the sanitary flow monitoring data collected from the sanitary sewers in Snelling, University, and further downstream in Prior Avenue upon request.

4.3.4 STORMWATER

The development of the project site will generate stormwater runoff. The project is a redevelopment of an urban area that was largely impervious with limited stormwater management features beyond storm sewer conveyance systems. The redevelopment project provides the opportunity for improved stormwater management and treatment on the site. The project site includes both private lands (i.e., building sites) and public lands (i.e., City streets) that will generate stormwater runoff that needs to be managed.

As part of the development review for the project site, a Comprehensive Stormwater Management System was developed (2018, Prepared by Loucks). Multiple stakeholders were involved in the review and development of stormwater system including the City of Saint Paul Public Works, Sewer Department and Water Resources Coordinator, Capitol Region Watershed District (CRWD), and the Snelling-Midway Redevelopment, LLC. Through this process it was agreed by the stakeholders that the stormwater runoff for the entire 35-acre project site could be managed as one combined system managing and treating stormwater from private and public lands. This creates efficiencies in the construction and operation of the stormwater system and eliminated the need for multiple individual stormwater features. The stormwater system includes consideration of incorporating Shared, Stacked, Green Infrastructure (SSGI) to ensure the City and Watershed's stormwater runoff volume and treatment standards are met.

The only portion of the project site where development has been completed is the soccer stadium, and appropriate features have been constructed to manage stormwater from this area. Tree trenches with engineered soils collect and treat stormwater from the streets and right of way, which collect runoff and utilize a piping system to create natural irrigation. Stormwater from the stadium roof is captured and directed to an underground hydrodynamic separator, which is a stormwater treatment device that removes sediment and debris. The treated stormwater then flows to a 650,000-gallon storage tank which is used for irrigation. Prior to use for irrigation, the water undergoes further treatment including a 5-micron filter to remove fine particles, carbon treatment to remove odors, and ultraviolet light for disinfection. The water stored in this tank will eventually be used for irrigation across the entire 35-acre project site.

The stadium was constructed with a natural turf field to infiltrate runoff. Underneath the field, water flows through an engineered sand filter media where it is then collected in a drain tile system. The drain tile conveys stormwater to a 225,000-gallon tank under the lawn area north of the Stadium. The water is stored in this large tank and then pumped into the City storm sewer system complying with CRWD requirements for rate control.

During construction of the stadium a National Pollutant Discharge Elimination System (NPDES) Permit was acquired to manage stormwater runoff during construction. The NPDES permit



included the development and implementation of a construction Stormwater Prevention Plan (SWPP) identifying BMPs to manage runoff. BMPs that were implemented at the site during construction included:

- Construction entrance pads
- Storm drains and inlet protection
- Silt fencing
- Concrete washout areas
- Temporary sedimentation basins
- Bioroll ditch check
- Temporary seeding
- Final turf and landscaping establishment

A NPDES permit will continue to be required as development continues at the project site, including the continued management of stormwater runoff via practices identified in the SWPPP. The practices that were employed for the construction of the stadium will be needed for all future development projects until construction of the site is complete. Active construction projects also require regular inspection of stormwater BMPs to ensure their functionality and implementation of timely corrective actions when BMPs are found to not be functioning as intended.

Based on the 2020 Anticipated Development Scenario, stormwater management practices would need to be evaluated prior to site plan approval. The 2018 comprehensive stormwater management plan would need to be updated and submitted to the City and CRWD for review.

Site development will continue to require the implementation of the SSGI approach with the use of Stormwater Reuse. Each individual development parcel will be required to provide CSWMP "Future Lot Stormwater Reuse Assumption Exhibit" and provide day tanks and individual irrigation pumping systems interfaced with Vault 200 controller. Stormwater discharge rates and routing (roof and surface) will be required to comply with assumptions of 2018 CSWMP or the updated assumptions in the new plan approved by the City and CRWD.

Mitigation measures to manage stormwater at the project site will continue to include the implementation of BMPs during project construction, continued site inspections, and implementation of the stormwater management practices, including SSGI practices will be required under the 2020 Anticipated Development Scenario

The City will require the developer to complete and submit an updated comprehensive stormwater analysis prior to submittal and subsequent approval of any site plan.

4.3.5 WATER APPROPRIATION

The residential units, as well as the operation of the stadium, hotel, office space, and retail businesses, will consume water. The 2016 AUAR anticipated proposed construction would result in a water demand between 290,000 gallons per day and 506,000 gallons per day, with an additional 11,000 gallons per day estimated to be needed during summer months for irrigation of the soccer stadium. Water is supplied to the project site by the Saint Paul Regional Water Services (SPRWS). The project components will be connected to existing municipal service near



the project area, including a 16-inch water main located on Snelling Avenue and a 12-inch water main along University Avenue.

To date the only project component that has been constructed and connected to the water supply system is the stadium. As only one project component has been completed to date, the amount of water consumption at the site is below the original estimates. The 2016 AUAR identified that booster pumps may be needed to provide the appropriate water pressure to reach the upper floors of taller buildings. The remaining development components for the project site include multi story buildings such as the hotel and residential buildings. As the part of the construction of these buildings, booster pumps may be needed to provide the needed water pressure for the upper floors of these buildings. The specific location and number of any booster pumps needed will be determined by the City during the review of individual development applications for building sites.

4.4 SOLID WASTES, HAZARDOUS WASTES, STORAGE TANKS

Demolition

Pre-demolition hazardous building materials surveys in accordance with the MPCA and MDH were done for buildings that have been demolished to date, including the buildings below. All of the buildings were demolished as part of the development of the stadium with the exception of the Big Top Liquor (formerly Perkins) along University Ave and the remaining portion of Midway Shopping Center.

- Big Top Liquor (original location at Snelling and Shields)
- Rainbow Foods (east of Big Top Liquor)
- Portions of the Midway Shopping Mall (east of Rainbow Foods)
- Bank building (Snelling and University)
- Big Top Liquor (temporary location at former Perkins along University Avenue)
- Remaining portion of Midway Shopping Center

During demolition of the Midway Shopping Center, Rainbow Foods, Big Top Liquor (original location), and the bank building, suspect ACM waterproofing was identified on the exterior of the respective building foundations. Samples of the waterproofing materials on the foundations were collected and submitted for laboratory analysis for asbestos by polarized light microscopy (PLM). The results for the samples confirmed that the waterproofing materials did contain asbestos. Based on these results, the foundations with waterproofing were segregated, handled and disposed of at the SKB Industrial landfill as Category 1 non-friable ACM. The buildings were inspected by Ramsey County staff prior to demolition to confirm all identified materials were removed. Closeout Abatement Reports were prepared and disposal documentation for the ACM waterproofing is included in the final RAP Implementation Report currently being prepared for the Stadium project. The demolition work to date was completed by Carl Bolander & Sons and by Ramsey Companies, Inc. and all waste material was disposed of or recycled in the proper facilities.

Pre-demolition hazardous materials reports were completed by Braun Intertec for the remainder of the Midway Shopping Center and the Big Top Liquor (formerly Perkins) building. A No Association Letter was issued by the MPCA, approving the Contingency Construction Plan for demolition. The excavation contractor, Ramsey Companies, proposes to use granular soil from



another location to fill the below ground areas that are excavated as part of the demolition. Ramsey Companies has provided Braun with lab results for five samples of the proposed materials. The number of soil samples and sample testing parameters were consistent with MPCA requirements for the project that were incorporated into the recent Construction Contingency Plan document prepared by Braun. Braun has reviewed the laboratory reports and the testing results are all within the MPCA's standards for use as unregulated fill.

Materials and Waste

Contaminated/Hazardous Materials: For the construction of the soccer stadium and surrounding infrastructure, all contaminated soils, which included incidental hazardous materials encountered (or suspected) during excavation of the man-made fill on site, were managed and disposed of in accordance with the MPCA-approved Response Action Plan (RAP) and Construction Contingency Plan (CCP). A RAP Implementation Documentation Report has been prepared for the project by Braun and is currently being reviewed by the environmental project management team. The report has been submitted to the MPCA Voluntary Brownfields Program for review upon final approval by the environmental project management team. Documentation related to the completed contingency actions are included in the final RAP Implementation Report currently being prepared for the Stadium project.

Northern Portion of the AUAR Area: Although redevelopment for the northern portion of the AUAR area has not started, preliminary investigation of the area has taken place, and a Response Action Plan was prepared for Blocks B1 and B2 in 2019 and 2020, with the anticipation that they would be developed first. Testing was completed by Braun Intertec.

Municipal Solid Waste (MSW): Material waste handling was managed according to MPCA and other regulatory requirements.

MPCA Programs

The southern area of the AUAR area was enrolled in two of the Minnesota Pollution Control Agency's (MPCA) programs, including the Voluntary Investigation and Cleanup (VIC) Program and the Petroleum Brownfields Program.

- VIC Project ID#: VP33910
- PBP Site ID#: PB4988

4.5 FISH, PLANT COMMUNITIES, AND SENSITIVE ECOLOGICAL RESOURCES

Migratory Birds

The 2016 AUAR included a Mitigation Strategy regarding tree clearing between mid-August and mid-April to minimize impacts to the northern long-eared bat (NLEB) and migratory birds. The 2016 AUAR also stated that a small number of trees were and are present within the AUAR area, which may be utilized by NLEB. Under the Final 4(d) Rule of the ESA, tree clearing is not prohibited as there are no records of NLEB maternity roost trees or a hibernaculum within the AUAR area or a 0.25-mile buffer. Approximately 5 trees are present on the portions of the site that have not yet been redeveloped. Note that the mature trees adjacent to the former Big Top Liquor building (demolished in 2018) are remaining.



Bird-Safe Buildings

The Minnesota B3 Guidelines are required on all projects that receive general obligation bond funding from the State of Minnesota and can also be used on a voluntary basis on any project. Although project activities to date did not receive general obligation bond funding from the state, and therefore building and other construction designs were not required to adhere to Minnesota B3 Guidelines, the MLS stadium is considered a bird safe building.

The MNDNR references Minnesota B3 Guidelines for developing bird-safe buildings in its comment letter dated March 23, 2016 of the Scoping EAW¹. The guidelines include information on building materials to reduce the reflection of glass windows and strategies for light operation to minimize impacts on migratory birds.

The architect for the completed stadium, Populous, submitted a bird-safe analysis summary to the City on July 3, 2017. The memo outlines the steps taken by Populous to address the concerns related to the potential threat to birds from the building's exterior skin. It has been determined that the PTFE laminated mesh fabric material on the outside of the stadium is considered "very bird safe."

After presenting this information to Saint Paul City officials in April 2017, the City requested that Populous also perform the Bird-Safe Building calculator evaluation specified in the B3 State of Minnesota Sustainable Building Guidelines. The results of this evaluation state that overall, the stadium's Whole Building Threat factor score is 11.97, well under the maximum allowable score of 45. This evaluation also revealed that the relatively small area of entire exterior (i.e., glass area at the entry gates) could be potential trap areas as they provide see-through conditions less than or equal to 20 feet. The solution to this concern is the application of frit or other patterns on the glass to break up the view through the glass. This project will employ the use of graphics on these glass areas as needed.

Stormwater

Best Management Practices (BMPs) and Sediment Control Devices (ESCDs) were used by the Contactor during construction to prevent sediment-laden stormwater runoff from flowing downstream. A large part of the stadium was 20-feet below surface elevation and the water was managed within the excavation area without discharge.

The SPPP Plans were developed using multiple BMPs as the following:

- Construction entrance pads
- Storm drains and inlet protection
- Silt fencing
- Concrete washout areas
- Temporary sedimentation basins
- Bioroll ditch check
- Temporary seeding
- Final sodding and landscaping

¹ Minnesota B3. B3 Guidelines Version 2.2 (formerly the Minnesota Sustainable Building Guidelines). http://www.b3mn.org/guidelines/s_14.html. Website accessed March 28, 2016.



Native Plants & Noxious Weeds

The developer utilized native trees, plants and species widely used around the country. No invasive plants or noxious weeds were introduced by design. Examples of native species included in the tree planting plan, site landscape plan, and rain garden planting plan are listed below.

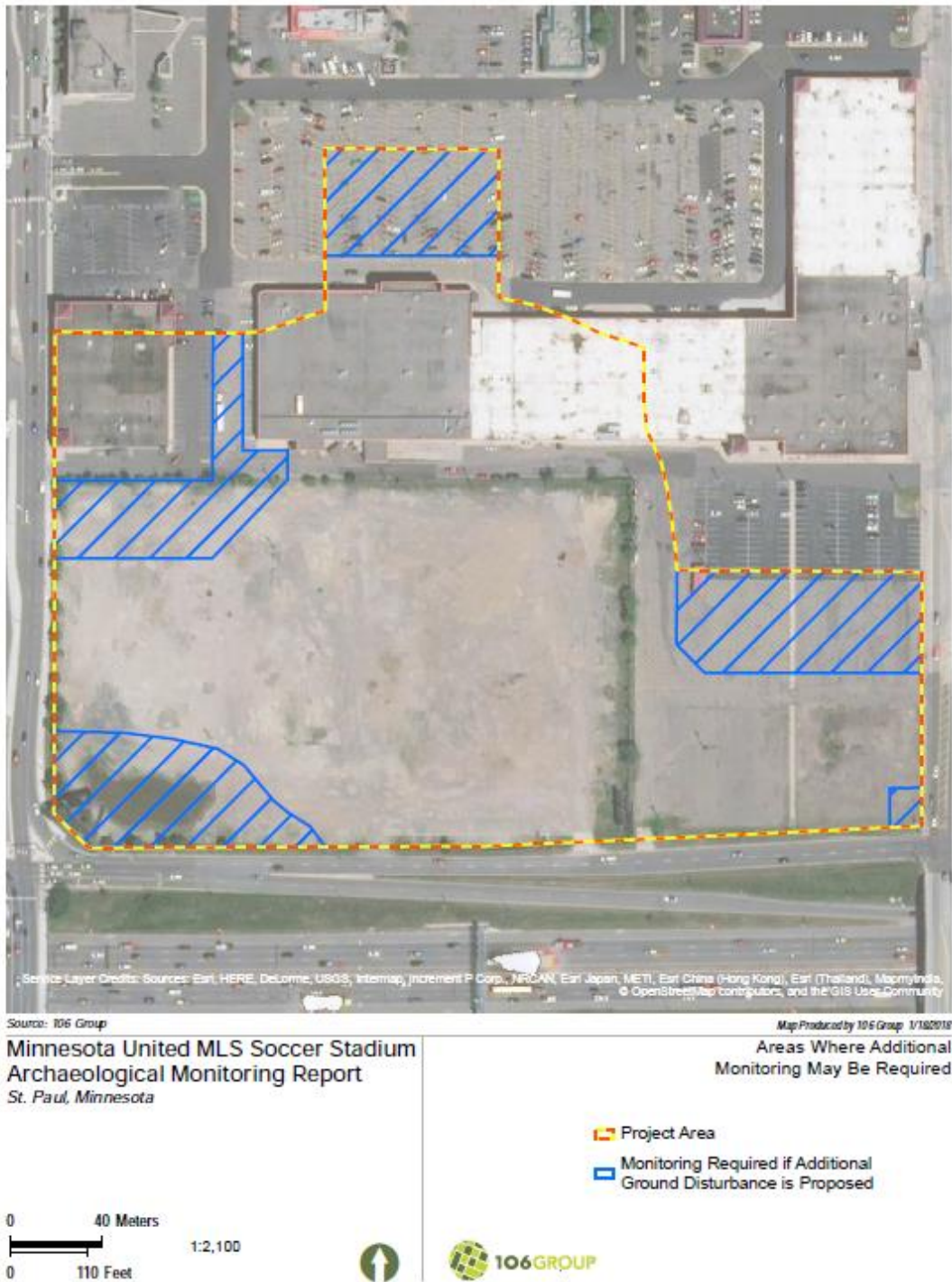
- Shade Trees
 - Autumn Blaze Maple, *Acer freemanii*
 - Sienna Glen Maple, *Acer freemanii* 'Sienna'
 - Northwood Red Maple, *Acer rubrum*
- Ornamental Grasses
 - Karl Foerster Feather Reed Grass, *Calamagrostis × acutiflora*
 - Dwarf Fountain Grass, *Pennisetum alopecuroides*

4.6 HISTORIC PROPERTIES

In accordance with the 2016 Final AUAR Mitigation Plan, archeological monitoring was conducted by a qualified archeologist during phase one of the development, when about half of the site was disturbed. The report of findings prepared by the consultant archaeologist, after disturbance activities ceased, concluded that none of the 25 features recorded were identified as potentially significant and the consultant recommended a qualified archaeologist be present to monitor future ground-disturbing activities in the areas identified in Figure 4-1. The Office of the State Archaeologist concurred with this recommendation in communications with the City during the AUAR update process. Based on the experience with phase one of the development, the presence of full-time inspectors was a major expense and yielded limited findings. In light of this experience, the City is committed to working with the State Historic Preservation Office to identify and implement an approach to the examination and monitoring of the identified areas in Figure 4-1 that is more reasonable, but still effective.



Figure 4-1. Areas for Additional Archaeological Monitoring



Between June 15, 2017, and January 4, 2018, the 106 Group conducted archaeological monitoring of the 19.26-acre project area for the stadium. Archaeological monitoring was conducted during project-related ground-disturbing activities including, but not limited to removal of existing underground utilities (where ground disturbance was required), excavation, trenching, grading, and drilling. Clearing/grubbing and pavement removal also required archaeological monitoring. A total of 25 post-contact archaeological features were recorded by 106 Group archaeologists during archaeological monitoring (site 21RA0081). These features likely relate to the Twin City Rapid Transit streetcar maintenance facilities that existed on the property in the early 20th century and the later Metropolitan Council Bus Barns. Because the features were documented in accordance with the Monitoring Plan, no additional archaeological work was recommended at the time. The 106 Group recommended that a qualified archaeologist be present to monitor ground-disturbing activities in some areas within the Project Area that were not extensively disturbed by project construction and could retain the potential to contain significant archaeological resources. In January of 2018 a report of all the archaeological monitoring conducted by the 106 Group was prepared and submitted to the SHPO and State Archaeologist's Office.

Between March 21 and March 29, 2019, Streamline Associates, LLC conducted a Phase I survey for architecture-history for the project. The area surveyed included the entire 34.43-acre project area plus a quarter-mile buffer surrounding the project area. A portion of this total area had been surveyed in 2018 North of University Ave and was not resurveyed in 2019 but the results of that survey were utilized to provide recommendations for the project. All areas south of University Ave were subject to Phase I survey during the 2019 survey. A total of 303 properties were inventoried during the Phase I architecture-history survey. The majority of properties surveyed are residential, primarily single-family houses and including duplexes and apartment buildings. In addition, the survey included churches, a hospital, and commercial, office, and industrial buildings. From the Phase I properties, six properties were identified for Phase II evaluations. In addition, based on the results of the 2018 reconnaissance survey north of University Avenue, an additional six properties were evaluated, for a total of 12 Phase II evaluations. Streamline recommended Phase II Evaluations of 12 properties. In November of 2019 a report documenting the results of the Streamline Associates Phase I survey and recommendations for all 12 Phase II Evaluations was completed and submitted to the SHPO. Phase II surveys have not been completed at this time.

4.7 VISUAL

Scenic Views

The AUAR area is located in a fully developed, urban, commercial area of Saint Paul. The AUAR area is currently occupied by the recently developed stadium, a single retail building, and surface parking lots, none of which provide scenic views to neighboring properties. There are no nearby scenic views or vistas around the AUAR area that would be impacted by development of Scenario 1 or Scenario 2. The AUAR area is bordered by Interstate 94 on the south, limiting views of future development from the south. Nearby residential neighborhoods are located south of I-94, west of Snelling Avenue and north of University Avenue.

Updates to the AUAR are not necessary in this category.



Visual Effects

The primary concern in the visual effects category identified in the 2016 AUAR was related to possible light trespass from stadium field lighting.

Stadium field lighting was designed with internal shielding and all fixtures are aimed down so that no direct lighting leaves the confines of the stadium. The lighting is Musco Total Light Control LED-900, which is efficient at directional lighting. Due to the lighting's internal shielding technology, an external glare shroud is not required.

Additionally, lighting installed to date is consistent with Sec. 63.116 of the City of Saint Paul Zoning Code. The traditional neighborhood design standard for parking lot lighting also applies to the redevelopment site:

Sec. § 66.343(20)

Parking lot lighting. Pedestrian-scale lighting shall be provided within parking areas. Light standards shall be no more than twenty-five (25) feet in height in parking lots and sixteen (16) feet in height along interior sidewalks and walkways and have a downcast glow.

Lighting Complaints

Table 4-1 below summarizes the complaints received about lighting and the measures that were taken to address them. Inspections were completed and it was determined that the lighting was in compliance.

Table 4-1. Lighting Complaints Received by the City of Saint Paul

Date Received	Complaint Information	Follow-up / Status
November 18, 2019	Lights are too bright	– DSI staff conducted an inspection of this property on 11/19/19 at 6:30pm. Staff inspected the property for any lights that faced directly outwards, for any lights that were flashing, and for any lights that were visibly brighter than the others. Staff did not find any lights that did not comply with the exterior lighting ordinance, Sec. 63.116. A reinspection of the property was conducted on 11/20/19 at 6:05pm. DSI staff did not observe any lights that were different from the inspection on 11/19/19. Measurements were taken of the light emitted from the street light poles, that are located on this private property and would not fall under the responsibility of Saint Paul's Public Works division, closest to the property line and they measured from 1.83 to 1.98 footcandles, which is well



Date Received	Complaint Information	Follow-up / Status
		below the 3.0 footcandle limit. Lights were found to be in compliance.
December 2018 February 23, 2018	Lights on all night There's a security light over port-a-potties on the SW corner of the soccer stadium that shines directly onto the freeway (94) and blinds people passing at night.	02/21/2019 Closed with comments. Lighting issue being addressed through site plan review. Property owners know not to conduct lighting testing without first contacting the city. 03/07/2018 Closed with comment. In compliance per Mike Palm.

An outdoor dynamic display device may be proposed by the Proposer for the AUAR area that would feature various types of programming for display including community night-out movies, showing live performances at community festivals, public service announcements and advertisements, visual art, and live broadcasts of home and away soccer games. As noted previously, the proposed outdoor dynamic display device is presently not a permitted use. The zoning code would need to be amended to allow such a use. It is likely that certain standards and conditions for the use would also need to be adopted in the event such a use is permitted to mitigate visual effects.

4.8 AIR

Stationary Source Emissions

The 2016 AUAR anticipated no stationary source emissions through development of the AUAR area. **Updates to the AUAR are not necessary in this category.**

Vehicle Emissions

Vehicle emissions, specifically related to the state air quality regulations to comply with National Ambient Air Quality Standards (NAAQS), were the primary concern analyzed in this category in the 2016 AUAR. Carbon monoxide, sulfur dioxide, nitrogen dioxide, and ozone concerns were not anticipated as a result of the development of the AUAR area. None of the intersections in the AUAR area exceed the criteria under any of the scenarios that would lead to a violation of the air quality standards.

Based on the 2020 Anticipated Development Scenario and associated land use changes, there are fewer total daily trips anticipated from full buildout of the AUAR area. A summary of this information is provided in Table 4-2. **Updates to the AUAR are not necessary in this category.**



Table 4-2. Summary of Vehicular Trip Generations Changes from 2016 AUAR from 2016 Adopted Master Plan to 2020 Anticipated Development Scenario

Vehicle Trips based on Land Use	Scenario 2		Change
	2016 Master Plan	2020 Anticipated Development Scenario	
AM Trips	1,746	1,052	Decrease by 694
PM Trips	2,573	1,577	Decrease by 996
Total Daily Trips	25,318	15,581	Decrease by 9,737

Dust and Odors

Per EQB Guidance, dust and odors need not be addressed in an AUAR (as no industrial uses are proposed) unless there is some unusual reason to do so. **There is no unusual reason to do so in this AUAR Update** with respect to the proposed project.

4.9 NOISE

The 2016 AUAR found the stadium and vehicular traffic resulting from new development in the AUAR area to be the sources of increased noise in the project area. The nearest residential units (either planned or under construction) are within approximately 150 feet of the stadium, with the closest existing single-family residential homes being approximately 400 feet from the stadium, located south across I-94, and planned multifamily units are proposed to be located adjacent to the east and to the northeast and northwest.

Stadium Noise

The 2016 AUAR determined that noise was not expected to exceed the City of Saint Paul daytime noise level standard at the closest noise-sensitive uses. Daytime noise levels would exceed standards for residential uses proposed in Scenario 2 in the 2016 AUAR at locations north and east of the stadium. During nighttime hours, the sound system may exceed the applicable sound level limit, depending on how long an event extends beyond 10:00 pm and how loudly the sound system is operated. Crowd noise may also exceed the City's nighttime limits. In all cases of exceedance of standards, mitigation in some form will be needed.

The Mitigation Strategies identified in the 2016 AUAR are summarized in Table 5-9, including a summary of updates on actions taken to adhere to the strategies, or if additional detail is warranted, responses to Mitigation Strategies are described in additional detail below.

The overall system loudness is electronically limited so that levels in the spectator seating cannot exceed levels that are compliant with the City standards. A Post-Construction Summary and Pre-Construction Report was completed by David Braslau Associates regarding noise level measurements.



Sporting events are scheduled so that regulation play is completed by 10 pm.

Complaints. The City has received noise complaints associated with the stadium. Table 4-3 summarizes the complaints received. Adjustments have been made accordingly.

An outdoor electronic display may be proposed for the AUAR area that would feature various types of programming for display including community night-out movies, showing live performances at community festivals, public service announcements and advertisements, visual art, and live broadcasts of home and away soccer games. The outdoor electronic display would emit sound during day and nighttime hours. If proposed, the City anticipates adopting standards and conditions for the use, which would require a master plan amendment process, to regulate sound to prevent adverse effects.

Table 4-3. Noise Complaints Received by the City of Saint Paul

Date Received	Complaint Information	Follow-up / Status
October 21, 2019	EXCESSIVELY LOUD music coming from the new soccer stadium beginning at approximately 2:30 pm. It is currently 5:40 and the music is still going strong. This NOISE POLLUTION is SOOOOO OBNOXIOUS and LOUD!! PLEASE set a REASONABLE limit to the volume of the entertainment that happens prior to and during ANY EVENTS at the Mn United Soccer Stadium.	DSI investigated. Sound level was in compliance with the sound level variance that had been issued.
August 31, 2019	Noise	Reviewed-No Response Required

4.10 TRANSPORTATION

As part of the Alternative Urban Areawide Review (AUAR) process, the AUAR is to be updated every five (5) years until the site is fully developed. Due to a combination of the COVID-19 related travel pattern impacts and lack of any development during the previous five (5) year period, new traffic data and intersection analysis were not completed as part of this AUAR update. Therefore, this AUAR update is intended to provide an overview of current development assumptions as compared with the previous development assumptions. The status of mitigation associated with the AUAR is updated in Chapter 5.

Note that the event transportation management plan (TMP) for events at the stadium was developed as required mitigation identified by the 2016 AUAR. The TMP is implemented only a small number of times per year for events at the stadium. The focus of this AUAR update is on non-event conditions created by non-stadium uses proposed for the AUAR area under the 2020



Anticipated Development Scenario. The TMP will be updated separately as needed based on a number of factors, including redevelopment within and near the AUAR area, as it occurs.

Development Assumptions

Two development scenarios were previously evaluated for the proposed development. The development scenarios contain similar land uses; however, the sizes of the specific land uses differ from one another. These were:

1. Comprehensive Plan/Snelling Station TOD Development plan scenario,
2. 2016 adopted Snelling Midway Master Plan

Both proposed development scenarios include a mixture of uses, including multi-family apartments, office, service retail type uses. In the 2016 adopted Snelling Midway Master Plan, a 20,000-seat soccer stadium that is expandable to a capacity of 25,500 is also included.

The 2020 Anticipated Development Scenario reflects:

- 948 multifamily units (increase of 328 as compared to the previous Master Plan)
- 100 hotel rooms (decrease of 300 hotel rooms)
- 802,680 square feet (SF) of office space (decrease of 197,320 SF of office)
- 241,424 SF of retail space (decrease of 179,576 SF of retail space)

Development Trip Generation

In order to determine the difference in trips between the 2020 Anticipated Development Scenario and the two previous land uses scenarios, a trip generation estimate for the proposed land uses was developed for the a.m. and p.m. weekday peak hours as well as a daily weekday basis.

Reductions were applied for trips between land uses (i.e., residential to retail) internal to the site, for trips using other transportation modes besides a vehicle, and removal of the trips currently generated by the site. Multi-Use reduction was developed based on the methodology within the ITE Trip Generation Manual, Ninth Edition and NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments. This accounts for a 15 percent multi-use reduction for the 2020 Anticipated Development Scenario.

Mode share was completed using results from the Twin Cities Regional Model and the Ford Site Mode Share Methodology. This estimates the number of people who arrive and depart the site using car, walking, biking, LRT or bus. The mode share can be influenced with the implementation of travel demand management (TDM) measures.

The estimates for the 2020 Anticipated Development Scenario, shown in Table 4-4, were developed using the ITE Trip Generation Manual, Tenth Edition.



Table 4-4. Trip Generation Estimates – 2020 Anticipated Development Scenario

Land Use Type (ITE Code)	Size	A.M. Peak Hour Trips		P.M. Peak Hour Trips		Daily Trips
		In	Out	In	Out	
Proposed Land Use						
Apartments (221)	948 Dwelling Units	88	253	254	163	5,158
Hotel (310)	100 Rooms	28	19	31	29	836
Office Building (710)	802,680 SF	801	130	147	776	7,821
Shopping Center (820)	241,424 SF	140	87	441	477	9,098
Total Trips		1,057	489	873	1,445	22,913
Internal Multi-Use Trip Reduction (15%)		159	73	131	217	3,437
Subtotal of External Trips		898	416	742	1,228	19,476
External Trip Mode Share						
Walk – 3%		27	12	22	37	584
Bike – 2%		18	8	15	25	390
LRT – 10%		90	42	74	123	1,948
Bus – 5%		45	21	37	61	974
Vehicle – 80%		719	333	594	983	15,581

Results of the trip generation estimates for the 2020 Anticipated Development Scenario indicate the proposed development is expected to generate a total of approximately 1,314 a.m. peak hour, 1,970 p.m. peak hour and 19,476 daily trips to/from the network. Of those trips, it is estimated that 1,052 a.m. peak hour, 1,576 p.m. peak hour, and 15,581 trips will be completed by a vehicle.

A trip generation comparison was completed between the expected vehicle trips of the 2020 Anticipated Development Scenario and the previously adopted 2016 Master Plan and Comprehensive Plan. The comparison is shown in Table 4-5.



Table 4-5. Trip Generation Comparison – 2020 Anticipated Development Scenario

Land Use Type (ITE Code)	Size	A.M. Peak Hour Trips		P.M. Peak Hour Trips		Daily Trips
		In	Out	In	Out	
2020 Anticipated Development Scenario vs 2016 Master Plan						
	July 2020 Vehicle Trips	719	333	594	983	15,581
	2016 Master Plan	1,258	488	984	1,589	25,318
	Difference	-539	-155	-390	-606	-9,737
2020 Anticipated Development Scenario vs Comprehensive Plan						
	July 2020 Vehicle Trips	719	333	594	983	15,581
	2016 Comprehensive Plan	1,296	313	729	1,544	21,053
	Difference	-577	20	-135	-561	-5,472

Results of the trip generation comparison between the 2020 Anticipated Development Scenario and 2016 Master Plan indicate the proposed development is expected to generate 694 fewer a.m. peak hour, 996 fewer p.m. peak hour and 9,737 fewer daily trips to/from the network.

Results of the trip generation comparison between the 2020 Anticipated Development Scenario and the Comprehensive Plan Scenario indicate the proposed development is expected to generate 557 fewer a.m. peak hour, 696 fewer p.m. peak hour and 5,472 fewer daily trips to/from the network.

Given the significant reduction in the number of trips as compared with the two previous land use scenarios, it was determined that additional traffic modeling was not necessary. Additionally, the majority of the geometric mitigations identified as part of the original AUAR have already been completed as part of the stadium site reconstruction, as identified in Chapter 5. With the reduction in trips, it is not expected that any new mitigation strategies will be necessary to accommodate the proposed development.



5.0 MITIGATION PLAN UPDATES

The mitigation strategies from the 2016 AUAR are outlined below along with a status update and any future mitigation identified based on the information in Section 4.0. The stadium is the only development that has taken place within the AUAR project area to date, and its development has followed the anticipated projections from the 2016 AUAR for Scenario 2. The mitigation measures that have been completed to date have been consistent with the measures outlined within the 2016 AUAR. A summary of the mitigation measures that have been implemented to date or will be applicable to future phases of development are listed for the resource areas described in Section 4.0.

5.1 LAND USE

The AUAR project site has been developed thus far within the approved scenario in the 2016 AUAR. The 2020 Anticipated Development Scenario is different from the 2016 Adopted Master Plan. If the Proposer wishes to move forward on the 2020 Anticipated Development Scenario or similar, master plan amendments would need to be applied for and approved, prior to further platting and prior to site plan applications. The continued review of the master plan and subsequent development applications by the City as the overall project progresses will ensure the development actions are consistent with the approved AUAR. Specific mitigation strategies can be identified as part of the City review process and be added as conditions of site plan approval and building permits if needed. Snelling-Midway Redevelopment LLC will continue to implement the mitigation items identified in the 2016 AUAR and updated here.

Table 5-1. Land Use Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
9-1. The City intends to amend its zoning code to allow outdoor sports and entertainment uses in the T4 district. This process is anticipated to be completed August 2016.	Complete. Ordinance 16-25 formally amended Chapters 65 and 66 of the City of Saint Paul Legislative Code pertaining to outdoor sports and entertainment in August 2016.
	Amendments to the zoning code and master plan will be needed to allow an outdoor dynamic display device if proposed. If these are amended, standards and conditions for the use will need to be adopted to mitigate adverse visual and noise effects.



5.2 GEOLOGY, SOILS, AND TOPOGRAPHY/LANDFORMS

Table 5-2. Geology, Soils, and Topography/Landforms Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
<p>10-1. If shallow groundwater is encountered in the AUAR area that requires dewatering, a temporary dewatering permit will be required from the Minnesota Department of Natural Resources if the dewatering is expected to exceed 10,000 gallons per day or 1 million gallons per year. Additionally, groundwater will be tested for contamination before dewatering activities begin. If the groundwater is contaminated, State and local agency input will be required to select an appropriate discharge location and/or on-site treatment of contaminated water.</p>	<p>A Water Appropriations Permit was acquired in May 2017 from the Minnesota DNR for dewatering.</p> <p>Still applicable for future redevelopment.</p>
<p>10-2. Any wells encountered during construction of the AUAR area that are no longer in use (or are not planned to be used following completion of construction) are required to be sealed by a licensed well contractor according to Minnesota Well Code. Wells may be allowed to remain open if an annual Unused Well Permit is obtained and conditions of the permit are followed.</p>	<p>1 well was found and sealed in accordance with MDH requirements dated March 29, 2018. Sealing Record No. H355103.</p> <p>Still applicable for future redevelopment.</p>
<p>10-3. To limit soil erosion, construction plans will include measures that restrict and contain any soil erosion using a variety of methods including silt fencing, seeding, mulching, and limiting the exposure of open soils to wind and rain. Discharge of stormwater will be managed in accordance with the City's National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer systems (MS4) Permit, Stormwater Pollution Prevention Plan (SWPPP) and Construction Site Stormwater Permit to ensure that erosion is limited and that any runoff-receiving water bodies are protected.</p>	<p>Confirmed. NPDES Permit for Construction Activities were obtained for the site activities. A SWPPP plan was prepared per the NPDES Requirements by a Certified SWPPP designer. The Capital Region Watershed District and the City of Saint Paul reviewed these documents.</p> <p>Still applicable for future redevelopment.</p>



5.3 WATER RESOURCES

The portions of the development that have been completed to date have been consistent with the 2016 AUAR and 2016 Master Plan regarding water resources and the required mitigation. The 2020 Anticipated Development Scenario would require amendments to the 2016 Adopted Master Plan, as well as updated studies, analysis, and design plans to be submitted, specifically for the areas of wastewater and stormwater. Based on the results of these future analysis and studies, additional specific mitigation measures related to stormwater and wastewater may be identified and added as conditions of site plan review or building permits. The mitigation measures related to water resources from the 2016 AUAR listed in Table 5-3 are still applicable to the future development efforts on the project site.

Table 5-3. Water Resources Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
11-1. As the AUAR area develops, evaluation of wastewater flow generation versus capacity of the existing City sanitary sewer system will be performed. Improvements to the City system will be implemented as needed.	Adequate capacity in the receiving sanitary sewer lines will be required from the proposer as part of the site plan review process. The city recommends capacity be confirmed prior to submittal of a site plan for review. Satisfactory availability and capacity will be required for site plan approval.
11-2. As the AUAR area develops, stormwater Best Management Practices (BMPs) will be implemented to satisfy City, CRWD, and State requirements. Such BMPs could include stormwater storage for rate control; infiltration, filtration, or bioretention for volume control and water quality treatment; rainwater/stormwater harvesting for reuse for volume control and water quality treatment as well as to reduce potable water demand; and temporary erosion and sediment control features such as vegetative restoration, storm drain inlet protection, construction entrance protection, and silt fence.	Stormwater BMPs identified in the 2016 AUAR are still applicable to future stages of the development. As part of the review process for the updated master plan, the 2018 stormwater management plan for the site will need to be updated by the proposer and reviewed by city staff. Individual buildings sites will need to provide appropriate stormwater management that comply with City and CRWD requirements. New stormwater management measures identified as part of the Master Plan review process may be added to site plan review or building permits by the City.
11-3. An effort will be made to address enhanced stormwater management that incorporates shared, stacked-function green infrastructure (SSGI) approaches. The Proposers and appropriate	The incorporation of SSGI stormwater management features will continue to be evaluated and implemented as needed as part of the site plan review process.



2016 AUAR Mitigation Strategies	2022 AUAR Update
stakeholders will work out the details of these approaches in the future.	
11-4. Stormwater detention and pumping and/or conveyance to other BMPS will be used to manage stadium runoff.	Still applicable for future redevelopment.
11-5. The existing Saint Paul Regional Water Services (SPRWS) water supply system has the available capacity to serve the AUAR area. However, lower pressures of 38-42 psi in the system may necessitate booster pumps for facilities that require greater water pressure. Multi-story structures will need booster pumps to service upper floors with sufficient water pressure.	Still applicable for future redevelopment.

5.4 CONTAMINATION, HAZARDOUS MATERIALS, WASTES

Table 5-4. Contamination, Hazardous Materials, Wastes Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
12-1. Complete a pre-demolition Hazardous Building Materials Survey of the existing buildings in accordance with Minnesota Department of Health (MDH) and MPCA requirements prior to the start of demolition activities to determine if any regulated materials are present. An Abatement Plan will be prepared to address the removal and proper disposal of regulated materials identified in the Hazardous Building Materials Survey.	Completed for work to date. Refer to Section 4.4. Still applicable for future redevelopment.
12-2. Demolition wastes will either be recycled or disposed in the proper facilities.	Completed for work to date. Refer to Section 4.4. Still applicable for future redevelopment.
12-3. The southern portion of the AUAR area will be enrolled in the MPCA's VIC Program and PBP.	Complete. Refer to Section 4.4.
12-4. A RAP and CCP have been prepared and submitted to the MPCA. The RAP summarizes environmental response actions and includes procedures for managing contaminated media, subsurface vapors and other	Complete. Refer to Section 4.4.



2016 AUAR Mitigation Strategies	2022 AUAR Update
<p>environmental mitigation measures during construction. The CCP includes measures for handling unknown contaminated materials that may be encountered during construction.</p>	
<p>12-5. Manage MSW according to MPCA and other regulatory requirements.</p>	<p>Completed for work to date. Refer to Section 4.4.</p> <p>Still applicable for future redevelopment.</p>
<p>12-6. Investigate the northern portions of the AUAR area prior to redevelopment. Prepare RAP/CCP based on results of the investigation. Complete a pre-demolition Hazardous Building Materials Survey of the existing buildings that remain in accordance with MDH and MPCA requirements prior to the start of demolition activities to determine if any regulated materials are present.</p>	<p>Completed.</p>
<p>12-7. In the event hazardous materials are encountered (or suspected) during excavation of the man-made fill on site, an environmental investigation to determine the type and volume of these materials will be required, including a plan to safely excavate and properly dispose of the materials encountered. The Response Action Plan/Construction Contingency Plan submitted to MPCA in March 2016 details appropriate methods to handle and dispose of any such materials that are encountered.</p>	<p>Completed for work to date. Refer to Section 4.4.</p> <p>Still applicable for future redevelopment.</p>
<p>12-8. A RAP/CCP will be prepared prior to development of the northern portion of the AUAR area. If contamination is encountered that precludes residential uses, then the AUAR will be updated with a revised land use plan.</p>	<p>Still applicable for future redevelopment.</p>



5.5 FISH, WILDLIFE, PLANT COMMUNITIES, AND SENSITIVE ECOLOGICAL AREAS

Table 5-5. Fish, Wildlife, Plant Communities, and Sensitive Ecological Areas Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
13-1. Tree clearing will occur during winter (i.e., mid-August to mid-April) to minimize impacts on NLEB and migratory birds. If tree clearing during this window cannot be avoided, additional steps, including but not limited to field surveys, must be completed.	Not applicable. Refer to the Migratory Birds analysis in Sec. 4.5 above.
13-2. If project activities will receive general obligation bond funding from the State of Minnesota, building and other construction designs must adhere to the Minnesota B3 Guidelines, which include strategies for developing bird-safe buildings and meet other sustainability goals. These guidelines can also be used on a voluntary basis on any project.	Not applicable for work to date. Potentially applicable for future redevelopment.
13-3. For construction of the stadium and appurtenant areas, best efforts shall be made to meet the intent of the Saint Paul Sustainable Building Policy.	Completed.
13-4. If project activities receive more than \$200,000 from the City of Saint Paul or Saint Paul HRA, the project will comply with the Saint Paul Sustainable Building Policy.	Not applicable for work to date. Potentially applicable for future redevelopment.
13-5. BMPs and ESCDs will be used during construction activities to prevent sediment-laden stormwater runoff from the AUAR area.	Confirmed. Still applicable for future redevelopment.
13-6. To the maximum extent practicable, native plants will be used for landscaping within the AUAR area to prevent the introduction and spread of invasive plants and noxious weeds.	Completed. Still applicable for future redevelopment.
13-7. Minnesota statutes (Chapter 18) and local ordinances regulate management of noxious weeds and invasive species. Best management practices (BMPs) during construction activities and operation within the AUAR area will be implemented to minimize the introduction or spread of noxious weeds and invasive species at the site.	Still applicable for future redevelopment.



5.6 HISTORIC PROPERTIES

Table 5-6. Historic Properties Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
<p>14-1. Because the site is entirely built and paved, a Phase I archeological survey cannot be completed until demolition begins. However, once pavement is removed, the site will be monitored by a qualified archeologist to ensure no archeological features exist. The qualified archeologist will coordinate with the MN SHPO and the Office of the State Archeologist to complete a formal Phase I survey or a formal monitoring plan through this process.</p>	<p>The City is committed to working with SHPO and Proposer to identify and implement an approach to the examination /archaeological monitoring of the identified areas in Figure 4-1 that is more reasonable, streamlined, but still effective.</p>
<p>14-2. The City of Saint Paul will review the Central Corridor Final EIS and update the State Historic Preservation Office (SHPO) of any changes relating to historic structures since that document's publication. This includes changes to both federal and state procedures for evaluating standing structures, noting whether any buildings have been razed or altered since the previous evaluation, and whether any buildings in the indirect and direct Area of Potential Effect are eligible for NRHP listing. After the APE is agreed upon with SHPO and other concerned parties, the City of Saint Paul will complete the analysis.</p>	<p>Because a complete Phase I survey for architecture-history was completed, no additional Phase I survey is required. Phase II Surveys recommended as a result of the Phase I Survey must be completed as determined in consultation with the SHPO and the City of Saint Paul.</p>



5.7 VISUAL

Table 5-7. Visual Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
15-1. The stadium's planned design locates sports light fixtures underneath the stadium's canopy. Figure 15-1 in the Final AUAR depicts anticipated mounting conditions of light fixtures to direct glow toward the playing field. Fixtures will have internal shielding and external glare shrouds and will be aimed to optimize the lighting on the playing field. All fixtures will be aimed down so that no direct lighting will leave the confines of the stadium.	Confirmed. Refer to Section 4.7.
15-2. All development in the AUAR area shall be consistent with Sec. 63.116 of its Zoning Code or the project proposer will need to obtain a variance.	Development to date meets requirement. Still applicable for future redevelopment.
	Adoption of standards and conditions for the outdoor dynamic display device use, if the zoning code and master plan are amended, to mitigate adverse effects.

5.8 AIR

Table 5-8. Air Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
16-1. No exceedances of air pollutant concentrations resulting from the proposed project are anticipated; therefore, no mitigation measures are necessary.	Not applicable.



2016 AUAR Mitigation Strategies	2022 AUAR Update
<p>16-2. No exceedances are anticipated under the construction phase. However, a series of Best Management Practices (BMPs) will be implemented during construction to control dust. These will include the following preventive and mitigative measures:</p> <ul style="list-style-type: none"> • Minimization of land disturbance during site preparation to the extent practical • Use of watering trucks to minimize dust • Stabilization of dirt piles in accordance with applicable Minnesota Pollution Control Agency standards • Use of dust suppressants on unpaved areas as appropriate for weather conditions • Minimization of unnecessary vehicle and machinery idling • Revegetation of any disturbed land post-construction in accordance with applicable Minnesota Pollution Control Agency standards 	<p>Completed for work to date.</p> <p>Still applicable for future redevelopment.</p>

5.9 NOISE

Table 5-9. Noise Mitigation Summary

2016 AUAR Mitigation Strategies	Update
<p>17-1. The overall system loudness should be electronically limited so that levels in the spectator seating cannot exceed levels that are compliant with the City standards. The calculations assume a maximum of 90 dBA at the spectator seating to limit the noise level at the closest residences to 65 dBA L10.</p>	<p>Compliant with City standards.</p>
<p>17-2. Sporting events will be scheduled so that regulation play is completed by 10 pm or MN United FC will need to obtain a sound level variance.</p>	<p>Confirmed.</p>
<p>17-3. Plaza amplified sound sources are to be configured and operated at levels which are consistent with the City noise standards, or a sound level variance will need to be obtained.</p>	<p>Still applicable</p>
<p>17-4. Any amplified music associated with stadium events, such as small musical groups performing pre-game in the seating bowl or exterior plaza, must be limited in loudness to comply with the City noise ordinance or a sound level variance will need to be obtained.</p>	<p>Still applicable</p>
<p>17-5. Continuous pre-game and half-time stadium sound system levels will likely have to be lower than in game announcements, in order to meet the City noise regulations.</p>	<p>Confirmed.</p>



2016 AUAR Mitigation Strategies	Update
<p>17-6. Future development on the stadium site will be designed with the understanding of the activities occurring at and noise levels generated by the stadium. Construction of Class II receptor uses within the 65 dBA, L₁₀ contour will require mitigation through decreased stadium sound levels or other means, such as a sound level variance.</p>	<p>Still applicable for future redevelopment.</p>
<p>17-7. The AUAR area is anticipated to be redeveloped in a phased manner to accommodate a mixed-use development including retail and service commercial, hospitality, residential, office, and open space uses. As shown in Figure 17-3 in the Final AUAR, locating outdoor use areas towards the interior of residential, hospitality, and office buildings will help prevent traffic noise impacts at these future uses. Locating outdoor uses in this manner results in greater setback distances from adjacent roadways (e.g., modeled L₁₀ noise levels at approximately 50 feet from University Avenue and Pascal Street were projected to be below state daytime L₁₀ standards for NAC-1). The buildings themselves also function to shield the outdoor use areas from traffic noise generated on nearby roadways.</p>	<p>The 2020 Anticipated Development Scenario locates outdoor use areas towards interior of buildings.</p> <p>Still applicable for future redevelopment.</p>
	<p>Adoption of standards and conditions for the outdoor dynamic display device use, if the zoning code and master plan are amended, to prevent adverse effects.</p>



5.10 TRANSPORTATION

Table 5-10. Transportation Mitigation Summary

2016 AUAR Mitigation Strategies	2022 AUAR Update
<p>18-1. Construct an internal roadway system to serve transportation modes, including sidewalks (minimum of eight feet) and bikeways (as appropriate). Provide a minimum of 400 bike racks at year of stadium opening. Complete with each phase of development.</p>	<p>The internal roadway system will be completed as development on the project site progresses.</p>
<p>18-2 Relocate the traffic signal on Snelling Avenue from Spruce Tree to Shields Avenue. Spruce Tree intersection would be modified to a right-in/right-out access. Relocation does not need to occur until such time as development of portions of the site for purposes other than the stadium and associated parking occurs. Extend the northbound left-turn lane at University Avenue. Subject to final approval of the City of Saint Paul and MnDOT of roadway design and lane configuration, at the time the traffic signal is relocated to Shields Avenue, Shields Avenue east of Snelling Avenue should be constructed to provide three-lanes of approach for westbound with two left-turn movements; left-turn lane, left-thru lane and right turn lane. Pedestrian movements should be accommodated on the north side in a 20-foot crosswalk. Complete with internal roadway development. a) Consider median fencing along Snelling Avenue between Shields Avenue and University Avenue to encourage use of the traffic signals for pedestrian crossings.</p>	<p>Completed.</p>
<p>18-3 Install a traffic signal at Pascal Street and Shields Extension intersection when enough development traffic meets warrants. Re-stripe Pascal Avenue to provide a three-lane roadway (one thru lane in each direction with left-turn lane) with the additional space as a bike-lane or shoulder and retain additional right-of-way for future roadway considerations. Install a permanent traffic signal at Pascal Street and Saint Anthony. Complete with the phased development.</p>	<p>Partially completed. The extension of Shields to Pascal Street has not been completed yet. The three-lane restriping of Pascal Street has been completed.</p>
<p>18-4 Add an Eastbound right-turn lane during the peak hours by restricting 100 feet of parking along Marshall Avenue at Hamline Avenue. Completed with phased development and not needed in year of opening.</p>	<p>Not Completed. Still applicable for future redevelopment.</p>
<p>18-5 Update the traffic study and signal timing along Snelling as needed with each phase of master plan development.</p>	<p>Not Completed as no development has occurred to date. Still</p>



2016 AUAR Mitigation Strategies	2022 AUAR Update
	applicable for future redevelopment.
18-6 Implement TDMP (Travel Demand Management Plan) strategies with future re-development and promote TOD (Transit Oriented Development) and complementary land uses.	Not Completed as no development has occurred to date. Still applicable for future redevelopment.
<p>18-7 The 2016 AUAR Mitigation Plan identified formation of a Transportation Management Committee (TMC) as a mitigation strategy. The primary responsibility stated for the TMC would be the development of a Transportation Management Plan ("TMP") for stadium events for the first year of stadium operations. Following the development of the TMP, the TMC would then meet at least twice annually following the adoption of the TMP. The City, with the assistance of the City's traffic management consultant, SRF Consulting Group, Inc., and in consultation with various partner agencies including Metro Transit, Ramsey County Public Works, and MNDOT, developed the <i>Allianz Field Transportation Management Plan</i> dated March 22, 2019 as the TMP called for under Mitigation Strategy 18-8 for events at Allianz Field. The TMP was developed using the best available data, assumptions, and goals set forth under the AUAR Mitigation Plan. The main objective of the TMP was the safe and efficient operation of the various transportation modes serving stadium events. Accordingly, the TMP addressed pedestrian, bicycle, ride share, private charter bus shuttles, and passenger vehicle transportation modes as well as the Met Council's transit services (LRT, A-Line, and regular bus service). Based upon the TMP, the City and Minnesota United Soccer Club ("Club"), on April 9, 2019, jointly entered into an agreement entitled the <i>Allianz Field Event Management Agreement</i>, the purpose of which was to identify the respective obligations of the City and the Club based upon the 2019 TMP and any subsequent evolution of the TMP as the overall AUAR site evolves through development under the Master Plan. Based upon the input from the City's traffic consultant, partner agencies and the Club in developing the <i>Allianz Field Transportation Management Plan</i> and the subsequent adoption by the City and the Club of the <i>Allianz Field Event Management Agreement</i>, the intent of Mitigation Strategy 18-7 to develop by committee, a TMP for Allianz Field, has been fulfilled.</p>	Completed.



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<p>Moreover, Section 6.1 of the <i>Allianz Field Event Management Agreement</i>, entitled "Periodic Review and Revision of the TMP" states in relevant part: "the TMP is a dynamic document . . . developed based on a number of assumptions that the [the City and the Club] acknowledge will change over time . . . [and] . . . the City and the Club will monitor and assess the TMP and . . . consider making revisions based on experience gained during Event operations. Thereafter, the City and the Club will periodically review and evaluate revisions to the TMP to take into account actual experience of the modes of transportation to Events in the Stadium and the changes to the area surrounding the Stadium."</p> <p>Pursuant to Section 6.1, the City will continue to consult with partner agencies, the Club and other parties in response to redevelopment within and near the AUAR area, changes in stadium use or capacity, major changes to infrastructure or travel behavior, and other relevant changes to background conditions and to use this information to inform amendments to the game-day/event operation protocols under the <i>Allianz Field Event Management Agreement</i> which, as noted above, implements the Mitigation Strategy's goals for the TMP.</p>	
<p>18-8 Develop a Transportation Management Plan (TMP) for year of opening of the stadium that includes event traffic control, parking plan, transit plan, shuttle service to remote parking, routing/wayfinding plan, communication/education plan, and incident management/safety plan. TMP would be a living document updated based on modifications to the site or expansion of the stadium.</p> <p>18-8.1 Event Traffic Control Plan should address quantity and locations of traffic control agents, location, sizing and configuration of pedestrian/transit/shuttle staging areas and movement paths, needed road closures, and event signal timing.</p>	Completed.



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<p>18-8.2 Parking Plan features: 18-8.2.1 Parking on-site and within a mile of the stadium should be reserved and purchased with game tickets. Strategies for ensuring high vehicle occupancy for these spaces, such as requiring multiple ticket purchases to access on-site parking, should be explored. 18-8.2.2 Agreements for use of existing off-street parking facilities within walking distance of the stadium for event parking should be considered. Pre-sale of parking at these locations should be considered, and patrons should be directed to access by routes that do not pass through the intersection of Snelling and I-94. 18-8.2.3 Locations of remote/shuttle parking locations should be communicated to all patrons. Pre-sale of parking at these locations should be considered. 18-8.2.4 Off-site parking locations for patrons travelling via LRT and BRT should be identified and communicated to all patrons.</p>	<p>Completed.</p>
<p>18-8.3 Transit Plan features: 18-8.3.1 The TMC should work with Metro Transit to identify preferred alternatives for movement and queueing of transit riders on the AUAR site. Modification of alternatives may need to occur as redevelopment of the site occurs. 18-8.3.2 The TMC should work with Metro Transit to evaluate the feasibility of continued operation of LRT and BRT at peak frequency (10-minute headways) through end of event departure periods, availability of 3-car LRT trains through end of event departures, and availability of supplemental bus or train service on LRT, BRT and regular route transit during events.</p>	<p>Completed.</p>
<p>18-8.4 Shuttle/Remote Parking: 18-8.4.1 The TMP should plan for service to accommodate 7,000-8,000 patrons for games at year of opening. This number can be reduced as additional off-street parking within walking distance is identified. 18-8.4.2 The TMP should designate shuttle staging areas and patron boarding and alighting areas at or near the stadium site</p>	<p>Completed.</p>
<p>18-8.5 The Routing and Wayfinding Plan should identify and provide directions to LRT and BRT stations, regular route transit locations, parking within walking distance, and bike parking facilities. The TMC should consider the use of Changeable Message Signs (CMS) on the freeway, local streets, and on-site.</p>	<p>Completed.</p>
<p>18-8.6 The Communication and Education Plan should emphasize the limited availability of on-site and nearby parking,</p>	<p>Completed.</p>



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and encourage the use of transit, remote parking/shuttles, and private charters.	

AUAR Update Review

Pursuant to Minnesota Rules, part 4410.3610, subpart 7, this AUAR update is available for a comment period of 10 business days. Once the comment period has closed and if no objections are filed by state agencies or the Metropolitan Council, the City of Saint Paul will adopt the AUAR update. The MN United Stadium and Mixed-Use Urban Village AUAR will remain valid for an additional five years from the adoption date.

