



CITY OF SAINT PAUL Melvin Carter, Mayor

25 West Fourth Street, Ste. 1300 Saint Paul, MN 55102 Telephone: 651-266-6565

TO: Interested Parties (Including Minnesota Environmental Quality Board Distribution List)

FROM: Dr. Bruce Corrie Director Planning and Economic Development Department City of Saint Paul

DATE: June 10, 2019

SUBJECT: Order for Review and Comment of Scoping Alternative Urban Areawide Review (AUAR): Ford Site and adjacent parcels

As the Responsible Governmental Unit (RGU), the City of Saint. Paul has determined that an Alternative Urban Areawide Review (AUAR) is required for the proposed project referenced above and described herein. This document constitutes an order for review. Enclosed is the Scoping AUAR in the City of Saint Paul, Minnesota. This Scoping document is submitted to you for your review and comment as part of the AUAR process as described in Minnesota Rules 4410.3610, Subp. 5a.

Pursuant to Minnesota Rules 4410.3610, Subp. 5a(C), the purpose of the comments on a Scoping document for an AUAR is to suggest additional development scenarios that include alternatives to the specific large project or projects proposed to be included in the review, including development at sites outside of the proposed geographic boundary. The comments must provide reasons why a suggested development scenario or alternative to a specific project is potentially environmentally superior to those identified in the RGU's draft order.

A copy of the Scoping document has been officially submitted to the Minnesota Environmental Quality Board for publication of its availability for review in the EQB Monitor on June 10, 2019. The 30-day public comment period will begin on June 10, 2019 and will close at 4:00 PM on July 10, 2019.

### AUAR Area

The AUAR review area includes approximately 139 acres along the Mississippi River in the Highland Park Neighborhood. The project is located south of Ford Parkway and east of Mississippi River Boulevard. The site is located in Section 17, Township 28N, Range 23W. The proposed AUAR Study Area is shown on Figure 1.

### **Development Scenarios**

Two development scenarios are proposed for study in the AUAR, both of which are consistent with the Ford Site Public Realm Master Plan as amended by the City Council on April 10, 2019. The development scenarios are defined below:

### **Table 1: Development Scenarios**

Land Use	Ryan Companies	Ford Site Master	
	Development	Plan Maximum	
	Scenario	Development	
		Scenario	
Residential (dwelling units)	3,800	4,000	
Retail and Service (square feet of gross floor area)	150,000	300,000	
Office and Employment (square feet of gross floor area)	265,000	450,000	

The development scenarios also include public infrastructure including but not limited to roadways, sidewalks, trails, stormwater features and green space.



The public is invited to comment on the proposed development boundary and scenarios to be evaluated in the AUAR prior to issuance of a final AUAR order. The 30-day AUAR order comment period will begin on **June 10, 2019**. Comments will be accepted through **July 10, 2019 at 4:00 PM** and should be addressed to:

Menaka Mohan, Ford Site Planner City of Saint Paul 25 W 4<sup>th</sup> Street, Suite 1400 St. Paul, MN 55102 <u>FordSitePlanning@ci.stpaul.mn.us</u> or can be submitted through an online comment form found at www.stpaul.gov/Ford-auar



## SCOPING ENVIRONMENTAL ASSESSMENT WORKSHEET (EAW)

**JUNE 2019** 



Prepared by Kimley »Horn



Prepared for



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July 2013 Version

# **Environmental Assessment Worksheet**

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This Environmental Assessment Worksheet (EAW) form and EAW Guidelines are available at the Environmental Quality Board's website at: <u>http://www.eqb.state.mn.us/EnvRevGuidanceDocuments.htm</u>. This EAW form is being used to delineate the issues and analyses to be reviewed in an Alternative Urban Areawide Review (AUAR). Where the AUAR guidance provided by the Minnesota Environmental Quality Board (EQB) indicates that an AUAR response should differ notably from what is required for an EAW, the guidance is noted in *italics*.

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ASSESSMENT WORKSHEET (EAW)

**Note to reviewers:** Comments must be submitted to the Responsible Governmental Unit (RGU) during the 30-day comment period following notice of the Scoping EAW in the *EQB Monitor*.

## 1. Project Title

Ford Site

### 2. Proposer

Proposer: Ryan Companies US, Inc. (Ryan) Contact Person: Tony Barranco Title: Senior Vice President of Real Estate Development Address: 533 South Third Street, Suite 100 City, State, ZIP: Minneapolis, MN 55415 Phone: 612-492-4339 Email: tony.barranco@ryancompanies.com

### 3. RGU

RGU: City of Saint Paul Contact Person: Menaka Mohan Title: Ford Site City Planner Address: 25 W 4<sup>th</sup> Street City, State, ZIP: Saint Paul, MN 55102 Phone: 651-266-6093 Email: FordSitePlanning@ci.stpaul.mn.us Website: stpaul.gov/Ford-auar



### 4. Reason for EAW Preparation

#### Check one:

Required: ⊠EIS/AUAR Scoping □Mandatory EAW Discretionary: Citizen petition RGU discretion Proposer initiated

If EAW or EIS is mandatory, give EQB rule category subpart number(s) and name(s): Minnesota Rules, part 4410.3610, subpart 5a (Alternative Urban Areawide Review Process; Additional procedures required when certain large specific projects reviewed)

### 5. Project Location

County: Ramsey

City/Township: Saint Paul

**PLS Location (**<sup>1</sup>/<sub>4</sub>, <sup>1</sup>/<sub>4</sub>, **Section, Township, Range):** NE <sup>1</sup>/<sub>4</sub> and SE <sup>1</sup>/<sub>4</sub> of Section 17, Township 28N, Range 23W

Watershed (81 major watershed scale): Mississippi River - Twin Cities

**Tax Parcel Number:** 123-172823130002, 123-172823110092, 123-172823410001, 123-172823410002

At a minimum, attach each of the following to the AUAR:

- US Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries (see Figure 1)
- Map depicting the boundaries of the AUAR and any subdistricts used in the AUAR analysis (see Figure 2 and Figure 3)
- Cover type map as required for Item 7 (will be included in the AUAR)
- Land use and planning and zoning maps as required in conjunction with Item 9 (see Figure 3)



Figure 1: USGS Map





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Figure 2: AUAR Study Area



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Figure 3: Ford Site Zoning and Public Realm Master Plan Zoning Map

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### 6. Project Description

AUAR Guidance: Instead of the information called for on the EAW form, the description section of an AUAR should include the following elements for each major development scenario included:

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- Anticipated types and intensity (density) of residential and commercial/warehouse/light industrial development throughout the AUAR area
- Infrastructure planned to serve development (roads, sewers, water, stormwater system, etc.). Roadways intended primarily to serve as adjoining land uses within an AUAR area are normally expected to be reviewed as part of an AUAR. More "arterial" types of roadways that would cross an AUAR area are an optional inclusion in the AUAR analysis; if they are included, a more intensive level of review, generally including an analysis of alternative routes, is necessary.
- Information about the anticipated staging of various developments, to the extent known, and of the infrastructure, and how the infrastructure staging will influence the development schedule

The AUAR study area encompasses four parcels totaling approximately 139 acres, all of which are covered in the *Ford Site Zoning and Public Realm Master Plan* adopted by the Saint Paul City Council on September 27, 2017 and amended on April 10, 2019. The four parcels, shown on Figure 2, include:

- One 122-acre parcel referred to as the Ford Site
- One 4-acre parcel referred to as the Burg & Wolfson (Lunds & Byerlys) property
- Two parcels totaling 13 acres referred to as the Canadian Pacific Railway property

Ryan Companies US, Inc. (Ryan) is proposing to redevelop the 122-acre Ford Site, which is the location of a former Ford Motor Company assembly plant (see Figure 2). The proposed development would include residential, retail/service, office/employment, and civic/institutional land uses. The Burg & Wolfson (Lunds and Byerlys) property and Canadian Pacific Railway property are also included in the *Ford Site Zoning and Public Realm Master Plan*, but there are currently no development proposals for those properties.

Two scenarios are proposed for evaluation in the AUAR as outlined in Table 1. These scenarios and the study area are consistent with the *Ford Site Zoning and Public Realm Master Plan*. The Ryan Development Scenario represents the density of the development proposed by Ryan on the Ford Site (illustrated in Figure 4). The Master Plan Maximum Development Scenario represents the maximum density allowed under the current comprehensive plan on all four parcels within the study area.

Land Use	Ryan Development Scenario	Master Plan Maximum Development Scenario
Residential (dwelling units)	3,800	4,000
Retail and Service (square feet of gross floor area)	150,000	300,000
Office and Employment (square feet of gross floor area)	265,000	450,000
Civic and Institutional (square feet of gross floor area)	50,000	150,000

#### **Table 1: Development Scenarios**



Figure 4: Ryan Development Scenario



The intent of the AUAR is to identify the worst case potential impacts and the mitigation required to compensate for those impacts. The primary factor influencing site density is the site-generated traffic volumes, which are driven by the mix of land uses. If changes in the market require adjustments to the proposed land use, adjustments could be made as long as the total traffic generated under the

Master Plan Maximum Development Scenario is not exceeded and the proposed development is still compatible with the approved *Ford Site Zoning and Public Realm Master Plan*.

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Redevelopment of the site would include new infrastructure, including water service, sewer, stormwater, streets, and utilities, and most of the new services would connect into infrastructure networks that currently run along the periphery of the site. The proposed street grid is illustrated in Figure 3. A more detailed discussion of infrastructure needs will be included in the AUAR.

The proposed development within the AUAR study area is anticipated to start in late 2019 or early 2020 and will be ongoing for the next 10 to 15 years, depending on the market.

### 7. Cover Types

AUAR Guidance: The following information should be provided:

- A cover type map, at least at the scale of a USGS topographic map, depicting:
  - Wetlands (identified by Circular 39 type)
  - Watercourses (rivers, streams, creeks, ditches)
  - Lakes (identify public waters status and shoreland management classification)
  - Woodlands (break down by classes where possible)
  - Grassland (identify native and old field)
  - o Cropland
  - o Current development
- An overlay map showing anticipated development in relation to the cover types. This map should also depict any "protection areas," existing or proposed, that will preserve sensitive cover types. Separate maps for each major development scenario should be generally provided.

The AUAR study area is approximately 139 acres of urban land. Approximately 122 acres of the AUAR study area (excluding the Burg & Wolfson (Lunds & Byerlys) property and Canadian Pacific Railway property) have been cleared of prior improvements for redevelopment. Existing cover types within the study area will be determined by reviewing aerial photography and a wetland delineation, and a map of anticipated development in relation to the cover types will be included in the AUAR.

### 8. Permits and Approvals Required

AUAR Guidance: A listing of major approvals (including any comprehensive plan amendments and zoning amendments) and public financial assistance and infrastructure likely to be required by the anticipated types of development projects should be given for each major development scenario. This list will help orient reviewers to the framework that will protect environmental resources. The list can also serve as a starting point for the development of the implementation aspects of the mitigation plan to be developed as part of the AUAR.



### **Table 2: Anticipated Permits and Approvals**

Unit of Government Type of Application		Status
Federal		
Federal Aviation Administration	Obstruction Evaluation/Notice of Proposed Construction or Alteration (7460-1)	To be applied for
US Army Corps of Engineers	Section 404 Approval	To be applied for
	Wetland Delineation Concurrence	To be applied for
State		
Minnesota Department of Natural Resources	Temporary Water Appropriation Permit for construction dewatering	To be applied for
Minnesota Pollution Control Agency	National Pollutant Discharge Elimination System Stormwater Permit for Construction Activities	To be applied for
	Sanitary Sewer Extension Permit	To be applied for
	Response Action Plan approval	To be applied for, if needed
Minnesota Department of	Sealing of Monitoring Wells	To be applied for
Health	Water Main Installation Permit	To be applied for
Local		
Metropolitan Council	Sewer Extension Permit	To be applied for
	Sewer Permit to Connect	To be applied for
Capitol Region Water District	Wetland Conservation Act Approval	To be applied for
	Permit for stormwater management, erosion and sediment control, wetland management	To be applied for
Saint Paul Regional Water	Plumbing Permits	To be applied for
Services	Water Main Installation	To be applied for
Ramsey County	Right-of-Way Permits	To be applied for
	Road Access Permits	To be applied for
City of Saint Paul	Alternative Urban Areawide Review	In process
	Site Plan Review	To be applied for
	Preliminary Plat	To be applied for
	Development Agreements	To be applied for
	Final Plat	To be applied for
	Sign Permit	To be applied for
	Building Permit	To be applied for
	Excavation and Grading Permit	To be applied for
	Certificate of Occupancy	To be applied for
	Parkland Dedication	To be applied for
	Ordinance Permit for Construction of Public	To be applied for
	Improvements	.,
	Right-of-Way Excavation and Obstruction Permits	To be applied for
	Sewer Utility Connection Permits	To be applied for

### 9. Land Use

### a. Describe:

i. Existing land use of the site as well as areas adjacent to and near the site, including parks, trails, and prime or unique farmlands.

The AUAR study area consists of four parcels, one of which is the former location of a Ford Motor Company assembly plant. The plant operated from 1925 to 2011 and was decommissioned in 2014 and 2015, including the demolition of buildings and the removal of a majority of the slabs and subsurface structures. The majority of the study area is disturbed land with a strip of grass and trees around the edge. The Ford Little League Field, which includes three baseball fields, is in the southeast corner of the study area along Cleveland Avenue and is part of the Ford Site property. The other three parcels are adjacent to the former Ford Motor Company assembly plant and include two existing railyard parcels owned by Canadian Pacific Railway and the parcel owned by Burg & Wolfson in the northeast corner of the AUAR study area (see Figure 5).

Ford Parkway (County-State Aid Highway 42) borders the study area to the north. There is a row of commercial and office buildings on the north side of Ford Parkway and residential further to the north. The area between the AUAR study area, Ford Parkway, and Cleveland Avenue includes retail/commercial uses and multi-family residential. East of Cleveland Avenue is multi-family and single-family residential (see Figure 5).

To the southwest is Hidden Falls Regional Park and the Mississippi River Regional Trail, which continues along the western edge of the study area. Both Hidden Falls Regional Park and the Mississippi River Regional Trail are managed by the City of Saint Paul. To the west of the study area is a parcel owned by Ford Motor Company that contains a steam plant/wastewater treatment plant that served the assembly plant and a former dump site. The southern portion of Mississippi River Gorge Regional Park, managed by the Minneapolis Park & Recreation Board, is located near the northwest corner of the study area (see Figure 5).

There is no farmland within or adjacent to the study area.

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Figure 5: Parks and Trails



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ii.

Planned land use as identified in comprehensive plans (if available) and any other applicable plan for land use, water, or resource management by a local, regional, state, or federal agency.

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AUAR Guidance: Water-related land use management districts should be delineated on appropriate maps, and the land use restrictions applicable in those districts should be described. If any variances or deviations from these restrictions within the AUAR area are envisioned, this should be discussed.

The *Ford Site Zoning and Public Realm Master Plan* was developed specifically for this site and was adopted by the Saint Paul City Council on September 27, 2017. Amendments to the *Ford Site Zoning and Public Realm Master Plan* were adopted by the City Council on April 10, 2019. The Master Plan defines minimum and maximum development for the site, and the Ryan Development Scenario would be within the range defined in the Master Plan. Figure 3 shows the anticipated land use within the study area.

A portion of the AUAR study area is within the Mississippi River Corridor Critical Area (MRCCA), which is a joint state, regional, and local program that provides coordinated planning and management for the 72-mile stretch of the Mississippi River through the seven-county metropolitan area (see Figure 5). The City of Saint Paul is currently developing its MRCCA plan as part of the City's 2040 Comprehensive Plan. The proposed development will be reviewed for compatibility with the plan once it is available.

# iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The study area was previously zoned as light industrial and was rezoned as part of the Master Plan and related amendments to the city zoning code. The study area now contains six zoning districts as summarized in Table 3 and shown in Figure 3.

Zoning District	Description	Land Uses	Building Heights	Floor Area Ratio
F1: River Residential	High quality design and residential form that is compatible with the look of Mississippi River Boulevard	Residential mix of single-family homes, multi-unit homes, and carriage houses	20 feet minimum 48 feet maximum	0.25 - 1.5
F2: Residential Mixed Low	Primarily residential with few business uses; lower density	Residential mix of primarily townhouses with some small multi- family	30 feet minimum 55 feet maximum	1.0 - 2.0
F3: Residential Mixed Mid	Primarily residential with some business uses; medium density	Predominantly multi- family residential, with limited retail, service, and office	30 feet minimum 65 feet maximum	1.0 - 4.0
F4: Residential Mixed High	Mix of residential and business uses; high density	Predominantly multi- family residential, with limited retail, service, and office	48 feet minimum 75 feet maximum	3.0 - 6.0

**Table 3: Zoning District Summary** 



Zoning District	Description	Land Uses	Building Heights	Floor Area Ratio
F5: Business Mixed	Primarily retail, office, and service with some multi-family residential	Primarily retail, service, and office with some multi-family	40 feet minimum 65 or 75 feet maximum	2.0 - 4.0
F6: Gateway	Attractive gateways into site, focused on employment with some retail, service, and housing	Office, institutional, retail, and service, mixed-use residential and multi-family residential	30 feet minimum 65 feet maximum	1.0 - 3.0

Discussion of zoning requirements in the City's MRCCA plan will be included once available.

A portion of the AUAR study area by the Canadian Pacific Railway property is within Safety Zone B for the Minneapolis-Saint Paul International Airport. Land use safety zones are intended to restrict land uses that may be hazardous to the operational safety of aircraft using the airport and to protect the safety and property of people on the ground in the area near the airport. Within the boundaries of Safety Zone B, the following land uses are not allowed: churches, hospitals, schools, theaters, stadiums, hotels, motels, trailer courts, campgrounds, other places of frequent public or semi-public assembly, and ponds.

# b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 9a above, concentrating on implications for environmental effects.

AUAR Guidance: The extent of conversion of existing farmlands anticipated in the AUAR should be described. If any farmland will be preserved by special protection programs, this should be discussed.

If development of the AUAR will interfere or change the use of any existing designated parks, recreation areas, or trails, this should be described in the AUAR. The RGU may also want to discuss under this item any proposed parks, recreation areas, or trails to be developed in conjunction with development of the AUAR area.

The AUAR must include a statement of certification from the RGU that its comprehensive plan complies with the requirements set out at Minnesota Rules, part 4410.3610, subpart 1. The AUAR document should discuss the proposed AUAR area development in the context of the comprehensive plan. If this has not been done as part of the responses to Items 6, 9, 11, 18, and others, it must be addressed here; a brief synopsis should be presented here if the material has been presented in detail under other items. Necessary amendments to comprehensive plan elements to allow for any of the development scenarios should be noted. If there are any management plans of any other local, state, or federal agencies applicable to the AUAR area, the document must discuss the compatibility of the plan with the various development scenarios studied, with emphasis on any incompatible elements.

The development scenarios are consistent with the adopted *Ford Site Zoning and Public Realm Master Plan.* The AUAR will include discussion of any impacts to existing or development of new parks and trails and compatibility with nearby land uses, zoning, and relevant plans.

# c. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 9b above.

The proposed development scenarios are anticipated to be compatible with planned land use in the project vicinity. The proposed parks and trails will be addressed in the AUAR.

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## 10. Geology, Soils, and Topography/Land Forms

a. Geology – Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.

AUAR Guidance: A map should be included to show any groundwater hazards identified.

The following sources were consulted for this section: developer geotechnical reports, Ramsey County Geologic Atlas (geologic atlas), Minnesota Well Index, and the Ramsey County Soil Survey.

The AUAR study area is underlain by stream sediment and hillside sediment. These deposits range from sand and gravel with some fine sediment (clay and silt) to angular bedrock fragments with fine sediments. The upper layer of sediment within the AUAR study area is fill material as a result of previous construction activities within the area. The fill materials range in depth from 0 to 22 feet below ground surface (bgs) and consist of silty sand, clayey sand, poorly-graded sand, and crushed concrete and limestone.

Bedrock is encountered at varying depths across the AUAR study area, ranging in depth from approximately 4 feet bgs on the western half to 22 feet bgs on the eastern half. Bedrock is comprised of the Decorah Shale underlain by the Platteville Limestone/Dolostone, Glenwood Shale, and St. Peter Sandstone formations. The AUAR study area sits on the river bluff, which is approximately 100 feet above the Mississippi River and adjacent parkland.

The uppermost aquifer is the St. Peter Sandstone formation, and groundwater is present at approximately 100 to 115 feet below the surface. Perched groundwater is present in the unconsolidated overburden at shallow depths; however, the lateral extent is discontinuous.

Based on the geologic atlas, there are no known sinkholes, unconfined/shallow aquifers, or karst conditions located within the AUAR study area.

No further analysis for geology and soils will be included in the AUAR.

b. Soils and Topography – Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability, or other soil limitations, such as steep slopes or highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections, or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 11.b.ii.

AUAR Guidance: The number of acres to be graded and number of cubic yards of soil to be moved need not be given; instead, a general discussion of the likely earthmoving needs for ASSESSMENT WORKSHEET (EAW)

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development of the area should be given, with an emphasis on unusual or problem areas. In discussing mitigation measures, both the standard requirements of the local ordinances and any special measures that would be added for AUAR purposes should be included. A standard soils map for the area should be included.

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According to the Natural Resources Conservation Service (NRCS) Web Soil Survey and geotechnical information provided by the developer, the area is comprised of eight different soil types. The erosion hazard rating included in Table 4 indicates the hazard of soil loss from off-road areas after disturbance activities that expose the soil surface. Within the project site, most of the soils are either not rated or have a "slight" rating, meaning that erosion is unlikely under ordinary climatic conditions. One soil type, the Doreton - Rock outcrop complex which is approximately 1 percent of the overall study area, has a moderate rating. The soils information is included in Table 4 and Figure 6.

#### **Table 4: Soil Types**

Soil Type	Map Unit Symbol	Acres within Study Area	Percent of Site	Erosion Hazard
Copaston loam, 0-6 percent slopes	100B	7.5	5.4%	Slight
Barronelt silt loam	456	12.1	8.7%	Slight
Urban land – Copaston complex, 0-8 percent slopes	852B	1.0	0.7%	Not rated
Urban land – Waukegan complex, 0-3 percent slopes	857	3.2	2.3%	Not rated
Urban Land – Waukegan complex, 3-15 percent slopes	857C	13.3	9.6%	Not rated
Udorthents, wet substratum	1027	14.9	10.8%	Not rated
Urban land	1039	85.1	61.5%	Not rated
Dorerton-Rock outcrop complex, 25-65 percent slopes	1819F	1.4	1.0%	Moderate

Geotechnical borings have been completed for the 122-acre Ford Site within the AUAR study area and found that the upper layer of soil consists of fill material.

The AUAR will identify measures to protect soils from erosion during excavation and construction of the site. Any additional information provided by the developer will be utilized to supplement the information provided above.



Figure 6: Soil Types





### **11.Water Resources**

AUAR Guidance: The information called for on the EAW form should be supplied for any of the infrastructure associated with the AUAR development scenarios, and for any development expected to physically impact any water resources. Where it is uncertain whether water resources will be impacted depending on the exact design of future development, the AUAR should cover the possible impacts through a "worst case scenario" or else prevent impacts through the provisions of the mitigation plan.

- a. Describe surface water and groundwater features on or near the site below.
  - i. Surface Water lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within one mile of the project. Include DNR Public Waters Inventory number(s), if any.

The AUAR study area is a highly disturbed area; however, based on the National Wetlands Inventory, updated by Minnesota Department of Natural Resources (DNR) in 2016, approximately 4.5 acres of wetland area is located within the study area (see Figure 7).

There are no DNR Public Waters within the AUAR study area; however, the Mississippi River is within the study area vicinity.

Two impaired waters on the Minnesota Pollution Control Agency's (MPCA's) Part 303d Impaired Waters List are within one mile of the study area (see Table 5).

Impaired Waters	ID Number	Impairments
Mississippi River	07010206-814	Mercury, PCB, PFOS, Nutrients, Total Suspended Solids
Minnehaha Creek	07010206-539	Fecal Coliform, Chloride, Dissolved Oxygen, Fishes Bioassessments, Aquatic Macroinvertebrate Bioassessments

**Table 5: Impaired Waters** 

Drainage from the project area flows toward Hidden Falls Regional Park.

The AUAR will supplement the information above with any additional information provided by the developer. Mitigation strategies for the proposed stormwater impacts will also be identified in the AUAR.



Figure 7: Water Resources



ii.

Groundwater – aquifers, springs, and seeps. Include 1) depth to groundwater; 2) if project is within a MDH well protection area; and 3) identification of any onsite and/or nearby wells, including unique numbers and well logs, if available. If there are no wells known on site or nearby, explain the methodology used to determine this.

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The depth to groundwater within the AUAR study area is 100 to 115 feet below the surface in the St. Peter Sandstone formation (uppermost aquifer). Perched water is present in the unconsolidated overburden at shallow depths; however, the lateral extent is discontinuous. Seeps can be intermittently observed off site on the face of the bluff west of Mississippi River Boulevard.

Based on the Minnesota Department of Health's Minnesota Well Index, numerous unverified wells are located within the AUAR study area.

The AUAR study area is not located within a wellhead protection area or drinking water supply management area.

The AUAR will further investigate the status of the wells located within the study area and will provide mitigation strategies for all inactive and actives wells within the AUAR study area. Wells within the study area were installed as part of site remediation and are used as monitoring wells by the MPCA. Additional information provided by the developer will supplement the well data obtained from the Minnesota Department of Health.

- b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects below.
  - i. Wastewater For each of the following, describe the sources, quantities, and composition of all sanitary, municipal/domestic, and industrial wastewaters projected or treated at the site.

AUAR Guidance: Observe the following points of guidance in an AUAR:

- Only domestic wastewater should be considered in an AUAR—industrial wastewater would be coming from industrial uses that are excluded from review through an AUAR process
- Wastewater flows should be estimated by land use subareas of the AUAR area; the basis of flow estimates should be explained
- The major sewer system features should be shown on a map and the expected flows should be identified
- If not explained under Item 6, the expected staging of the sewer system construction should be described
- The relationship of the sewer system extension to the RGU's comprehensive sewer plan and (for metro area AUARs) to Metropolitan Council regional systems plans, including MUSA expansions, should be discussed. For non-metro area AUARs, the AUAR must discuss the capacity of the RGU's wastewater treatment system compared to the flows from the AUAR area; any necessary improvements should be described.

- If on-site systems will serve part of the AUAR, the guidance in the February 2000 edition of the EAW Guidelines on page 16 regarding item 18b under Residential development should be followed.
- 1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

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Existing sanitary sewers to serve the AUAR study area are located along Ford Parkway and Mississippi River Boulevard. These convey wastewater via city sanitary sewers to the Metropolitan Council interceptor system and eventually to the Metro Wastewater Treatment Plant. No land uses that would generate wastewater requiring pretreatment are anticipated in the AUAR study area. Based on a preliminary review, the existing infrastructure has capacity for the proposed development scenarios.

The AUAR will evaluate the estimated wastewater flows for the proposed development scenarios, and the existing sanitary sewer system will be evaluated to determine if there is adequate capacity to convey wastewater. Appropriate mitigation measures will be identified, if needed.

2) If the wastewater discharge is to a subsurface sewage treatment system (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system.

Not applicable.

3) If the wastewater discharge is to surface water, identify the wastewater treatment methods, discharge points, and proposed effluent limitations to mitigation impacts. Discuss any effects to surface or groundwater from wastewater discharges.

Not applicable.

ii. Stormwater – Describe the quantity and quality of stormwater runoff at the site prior to and post construction. Include the routes and receiving water bodies for runoff from the site (major downstream water bodies as well as the immediate receiving waters). Discuss any environmental effects from stormwater discharges. Describe stormwater pollution prevention plans including temporary and permanent runoff controls and potential BMP site locations to manage or treat stormwater runoff. Identify specific erosion control, sedimentation control, or stabilization measures to address soil limitations during and after project construction.

AUAR Guidance: For an AUAR the following additional guidance should be followed in addition to that in EAW Guidelines:

- It is expected that an AUAR will have a detailed analysis of stormwater issues
- A map of the proposed stormwater management system and of the water bodies that will receive stormwater should be provided

• The description of the stormwater systems would identify on-site and "regional" detention ponding and also indicate whether the various ponds will be new water bodies or converted existing ponds or wetlands. Where on-site ponds will be used but have not yet been designed, the discussion should indicate the design standards that will be followed.

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- If present in or adjoining the AUAR area, the following types of water bodies must be given special analyses:
  - Lakes: Within the Twin Cities metro area, a nutrient budget analysis must be prepared for any "priority lake" identified by the Metropolitan Council. Outside of the metro area, lakes needing a nutrient budget analysis must be determined by consultation with the MPCA and DNR staffs.
  - Trout streams: If stormwater discharges will enter or affect a trout stream, an evaluation of the impacts on the chemical composition and temperature regime of the stream and the consequent impacts on the trout population (and other species of concern) must be included.

Stormwater runoff from the former Ford Site primarily drains to one discharge point: Hidden Falls Creek, which flows to the Mississippi River. Approximately 25 acres of the Ford Site drained directly to the Mississippi River and will be redirected postdevelopment. No treatment or controls for runoff from the former Ford Site are currently present on the site. Historically, a creek was present within the AUAR study area and was buried prior to construction on the Ford Site. A network of below grade piping remains today.

The pre- and post-construction impervious surface areas will be estimated in the AUAR. The AUAR will address stormwater rates and volumes for the AUAR study area and any temporary and permanent stormwater run-off controls will be identified. Potential best management practices (BMPs), including the central stormwater retention system, will be addressed.

iii. Water Appropriation – Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use, and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation.

AUAR Guidance: If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed.

Construction dewatering may be required for the development of the AUAR study area.

Water mains to service the AUAR study area are provided within adjacent roadway rightof-way, and a preliminary review indicates that the existing infrastructure is sufficient for the anticipated development scenarios.

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Handling of any construction dewatering discharge required will be addressed in the AUAR. The AUAR will also address the water demands for the site and the existing city water system capacity. Mitigation strategies, if applicable, will be identified in the AUAR.

#### iv. Surface Waters

1) Wetlands – Describe any anticipated physical effects or alterations to wetland features, such as draining, filling, permanent inundation, dredging, and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed and identify those probable locations.

Based on the National Wetlands Inventory, approximately 4.5 acres of wetland is located within the AUAR study area.

The AUAR will include any supplemental information provided by the developer for potential wetlands within the 122-acre Ford Site parcel. Since the Burg & Wolfson (Lunds & Byerlys) property is fully developed, no wetlands are found within that parcel. The AUAR will address any potential wetland impacts based on the development, and mitigation strategies will be identified.

2) Other surface waters – Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal, and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.

AUAR Guidance: Water surface use need only be addressed if the AUAR area would include or adjoin recreational water bodies.

No additional surface water features have been identified within the AUAR study area.



## 12. Contamination/Hazardous Materials/Wastes

a. Pre-project Site Conditions – Describe existing contamination or potential environmental hazards on or in close proximity to the project site, such as soil or groundwater contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize, or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan.

Ford Motor Company and its environmental consultant Arcadis conducted environmental remediation activities across the site beginning in 2013. Ford completed its remediation activities in January 2019, and the MPCA issued a Certificate of Completion for the site on May 15, 2019. The site has been approved for residential and commercial use, with no restrictions. No additional analysis for the 122-acre Ford Site will be included in the AUAR.

The Burg & Wolfson (Lunds & Byerlys) property is fully developed, and any redevelopment may require coordination with the MPCA. The Canadian Pacific Railway property had some remediation activities completed during the Ford Site remediation efforts. Any redevelopment of the property will require additional coordination with the MPCA. No further analysis will be included in the AUAR.

b. Project Related Generation/Storage of Solid Wastes – Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.

AUAR Guidance: Generally, only the estimated total quantity of municipal solid waste generated and information about any recycling or source separation programs of the RGU need to be included.

The AUAR will provide information on the estimated quality of municipal solid waste to be generated by the development scenarios and will discuss recycling and source separation programs to be implemented.

c. Project Related Use/Storage of Hazardous Materials – Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location, and size of any above or below ground tanks to store petroleum or other materials. Discuss potential environmental effects from accidental spills or releases of hazardous materials. Identify measures to avoid, minimize, or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

AUAR Guidance: Not required for an AUAR. Potential locations of storage tanks associated with commercial uses in the AUAR should be identified (e.g., gasoline tanks at service stations).

The AUAR will identify any potential future storage tank locations anticipated as part of the proposed development.

d. Project Related Generation/Storage of Hazardous Wastes – Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous wastes including source reduction and recycling.

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AUAR Guidance: Not required for an AUAR.

# 13. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

### a. Describe fish and wildlife resources as well as habitats and vegetation on or near the site.

AUAR Guidance: The description of fish and wildlife resources should be related to the habitat types depicted on the cover types map. Any differences in impacts between development scenarios should be highlighted in the discussion.

The current site provides no fish habitat as there are no above ground streams, rivers, lakes, or ponds located on the site. Minimal wildlife habitat is located within the AUAR study area due to the prior extent of impervious surfaces and minimal natural vegetation. Wildlife that can be found within the study area are some song birds and small mammals that have adapted to the highly-disturbed urban environment. No native plant communities or sites of biodiversity have been identified within the AUAR study area.

The AUAR will address the cover types for the existing conditions and the post-construction scenarios.

b. Describe rare features such as state-listed (endangered, threatened, or special concern) species, native plant communities, Minnesota County Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-843) and/or correspondence number (ERDB) from which the data were obtained, and attach the Natural Heritage letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe results.

AUAR Guidance: For an AUAR, prior consultation with the DNR Division of Ecological Resources for information about reports of rare plant and animal species in the vicinity is required. Include the reference numbers called for on the EAW form in the AUAR and include the DNR's response letter. If such consultation indicates the need, an on-site habitat survey for rare species in the appropriate portions of the AUAR area is required. Areas of on-site surveys should be depicted on a map, as should any "protection zones" established as a result.

Based on a review of the state-listed threatened, endangered, and special concern species, there are numerous species within one mile of the AUAR study area. The only species identified in areas adjacent to the AUAR study area include mussels found in the Mississippi River.

The results of the Natural Heritage Information System data will be provided to the DNR and a correspondence letter will be requested. This information will be provided in the AUAR. Federally-listed species will also be reviewed and addressed in the AUAR.

c. Discuss how the identified fish, wildlife, plant communities, rare features, and ecosystems may be affected by the project. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.

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The AUAR will further investigate the potential for impacts to state-listed and federally-listed species that may be present within the AUAR study area.

Invasive species will be controlled on site during construction, and turf grass and other ornamental landscape plants will be used on the site and may provide some additional habitat for song birds, small mammals, and insects.

d. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.

The AUAR will address any potential mitigation measures identified by the DNR to minimize and avoid adverse impacts to any state-listed species. Measures to minimize impacts to federally-listed species that may be present on the site will also be included in the AUAR as appropriate.

### **14. Historic Properties**

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include 1) historic designations; 2) known artifact areas; and 3) architectural features. Attach letter received from the Minnesota State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

AUAR Guidance: For an AUAR, contact with the State Historic Preservation Office and State Archeologist is required to determine whether there are areas of potential impacts to these resources. If any exist, an appropriate site survey of high probability areas is needed to address the issue in more detail. The mitigation plan must include mitigation for any impacts identified.

A historical survey report was completed for the majority of the AUAR study area in 2007. The results of this survey and coordination with the Minnesota State Historic Preservation Office (SHPO) will be included in the AUAR. Due to the highly disturbed nature of the site, no archaeological resources are anticipated within the AUAR study area. No further surveys are anticipated.

### 15. Visual

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

AUAR Guidance: Any impacts on scenic views and vistas present in the AUAR should be addressed. This would include both direct physical impacts and impacts on visual quality or integrity. EAW Guidelines contains a list of possible scenic resources.

If any non-routine visual impacts would occur from the anticipated development, this should be discussed here along with appropriate mitigation.

The City of Saint Paul's 2030 Comprehensive Plan identifies significant public views in the city; none are identified within or near the AUAR study area. The map of significant public views is being updated in conjunction with the MRCCA plan and the 2040 Comprehensive Plan, so updated information will be incorporated when available.

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The AUAR will discuss visual impacts of the proposed development scenarios on the surrounding area and will summarize the lighting plan and any applicable mitigation strategies.

### 16. Air

a. Stationary Source Emissions – Describe the type, sources, quantities, and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants, criteria pollutants, and any greenhouse gases. Discuss effects to air quality including any sensitive receptors, human health, or applicable regulatory criteria. Include a discussion of any methods used to assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that will be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.

AUAR Guidance: This item is not applicable to an AUAR. Any stationary air emissions source large enough to merit environmental review requires individual review.

 b. Vehicle Emissions – Describe the effect of the project's traffic generation on air emissions. Discuss the project's vehicle-related emissions effect on air quality. Identify measures (e.g., traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions.

AUAR Guidance: Although the MPCA no longer issues Indirect Source Permits, traffic-related air quality may still be an issue if the analysis in Item 18 indicates that development would cause or worsen traffic congestion. The general guidance from the EAW form should still be followed. Questions about the details of air quality analysis should be directed to MPCA staff.

The Minnesota Department of Transportation (MnDOT) has developed a screening method designed to identify intersections that will not cause a carbon monoxide (CO) impact above state standards. MnDOT has demonstrated that even the 10 highest traffic volume intersections in the Twin Cities do not experience CO impacts. Therefore, intersections with traffic volumes lower than these 10 highest intersections will not cause a CO impact above state standards. MnDOT's screening method demonstrates that intersections with total daily approaching traffic volumes below 82,300 vehicles per day will not have the potential for causing CO air pollution problems. None of the intersections in the study area exceed the criteria that would lead to a violation of the air quality standards. All intersection levels of service are expected to be LOS D or better, meaning the corridor is moderately congested and the per vehicle delay is acceptable.

No further air quality analysis is anticipated for the AUAR.

c. Dust and Odors – Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 16a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors. AUAR Guidance: Dust and odors need not be addressed in an AUAR, unless there is some unusual reason to do so. The RGU might want to discuss as part of the mitigation plan, however, any dust control ordinances in effect.

The AUAR will include discussion of dust control ordinances, including BMPs that would be applicable during demolition and construction within the AUAR study area.

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### 17.Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area; 2) nearby sensitive receptors; 3) conformance to state noise standards; and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

AUAR Guidance: Construction noise need not be addressed in an AUAR, unless there is some unusual reason to do so. The RGU might want to discuss as part of the mitigation plan, however, any construction noise ordinances in effect.

If the area will include or adjoin major noise sources, a noise analysis is needed to determine if any noise levels in excess of standards would occur, and if so, to identify appropriate mitigation measures. With respect to traffic-generated noise, the noise analysis should be based on the traffic analysis of Item 18.

As stated in the AUAR guidelines, construction noise need not be addressed unless there is some unusual reason to do so. No unusual circumstances have been identified that would necessitate a detailed noise analysis. It should also be noted that full and limited access county roads are exempt from State noise standards.<sup>1</sup> To the extent possible, construction activities will be conducted to minimize noise levels and nighttime construction activities.

A sound increase of 3 dBA is barely noticeable by the human ear, a 5 dBA increase is clearly noticeable, and a 10 dBA increase is heard as twice as loud. For example, if the sound energy is doubled (i.e., the amount of traffic doubles), there is a 3 dBA increase in noise, which is just barely noticeable to most people. On the other hand, if traffic increases by a factor of 10, the resulting sound level will increase by about 10 dBA and be heard as twice as loud.

Traffic volumes in the project area are either on roadways that do not have receivers that are sensitive to noise, or, the traffic levels attributable to the project are well below the amount that would generate a sound increase that could be noticeable. The AUAR study area will be developed such that any land use activities that are sensitive to noise will have sufficient setbacks from existing noise sources to thereby reduce the potential for any noise impact. These details will be determined as the project development proceeds.

The change in traffic noise levels is not anticipated to be readily perceptible.

No further noise analysis is anticipated for the AUAR.

<sup>&</sup>lt;sup>1</sup> Minnesota Statutes, section 116.07, subdivision 2a(3)



### **18. Transportation**

a. Describe traffic-related aspects of project construction and operation. Include 1) existing and proposed additional parking spaces; 2) estimated total average daily traffic generated; 3) estimated maximum peak hour traffic generated and time of occurrence; 4) source of trip generation rates used in the estimates; and 5) availability of transit and/or other alternative transportation modes.

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The daily, AM peak hour, and PM peak hour traffic generation of the AUAR study area will be estimated, and a traffic impact study evaluating the traffic impacts of the AUAR study area will be completed for the AUAR. The traffic impact study will include intersection capacity analyses for intersections immediately adjacent to the AUAR study area along Ford Parkway, Cleveland Avenue, Saint Paul Avenue, and Mississippi River Boulevard. In addition, other intersections along roadways serving the study area such as Cretin Avenue, Fairview Avenue, 46<sup>th</sup> Street, and Highland Parkway will be evaluated.

The proposed additional parking spaces and the availability of transit and other transportation modes will also be documented in the AUAR.

A summary of the traffic and transportation analysis will be included in the AUAR.

b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at:

http://www.dot.state.mn.us/accessmanagement/resources.html) or a similar local guidance.

AUAR Guidance: For AUAR reviews, a detailed traffic analysis will be needed, conforming to the MnDOT guidance as listed on the EAW form. The results of the traffic analysis must be used in the response to Items 16 and 17.

A traffic impact study will be completed for the AUAR. The traffic impact study will estimate traffic generation, evaluate traffic impacts, and determine potential improvements and mitigations. The traffic impact study will include intersection capacity analyses for intersections immediately adjacent to the AUAR study area along Ford Parkway, Cleveland Avenue, Saint Paul Avenue, and Mississippi River Boulevard. In addition, other intersections along roadways serving the study area such as Cretin Avenue, Fairview Avenue, 46th Street, and Highland Parkway will be evaluated. The study will also review projected traffic volume changes on Highway 5, Highway 55, and other roadways providing access to/from the study area to determine if significant changes in traffic volumes are anticipated.

Figure 8 depicts the intersections expected to be included for intersection capacity analysis in the traffic impact study.

### c. Identify measures that will be taken to minimize or mitigate project related transportation effects.

The AUAR will address any mitigation measures identified through the traffic analysis.



## SCOPING ENVIRONMENTAL ASSESSMENT WORKSHEET (EAW)

Figure 8: Study Intersections





### **19. Cumulative Potential Effects**

AUAR Guidance: Because the AUAR process by its nature is intended to deal with cumulative potential effects from all future developments within the AUAR area, it is presumed that the responses to all items on the EAW form automatically encompass the impacts from all anticipated developments within the AUAR area.

However, the total impact on the environment with respect to any of the items on the EAW form may also be influenced by past, present, and reasonably foreseeable future projects outside of the AUAR area. The cumulative potential effect descriptions may be provided as part of the responses to other appropriate EAW items, or in response to this item.

a. Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.

Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency or persons undertakes such actions." The geographic areas considered for cumulative effects are those areas adjacent to the AUAR study area, and the timeframe considered includes projects that would be constructed in the reasonably foreseeable future.

b. Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.

No reasonably foreseeable future projects that may interact with the environmental effects of the Ford Site have been identified other than the Burg & Wolfson (Lunds & Byerlys) and Canadian Pacific Railway property, which are included in the AUAR study area and analyses.

c. Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.

Due to the lack of additional foreseeable projects in the vicinity, cumulative potential effects will not be addressed in the AUAR.

### **20. Other Potential Environmental Effects**

If the project may cause any additional environmental effects not addressed by Items 1 to 19, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

Various mined spaces/utility tunnels are located over 75 feet below the ground surface under the AUAR study area and have been sealed. Due to the depth of these areas, no impacts are anticipated from the future development of the AUAR study area. No additional analysis will be included in the AUAR regarding these deep tunnels. Developers of individual blocks will be advised of the tunnels and the need to mitigate any issues that may result from their development.