




CITY OF SAINT PAUL
Melvin Carter, Mayor

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

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

DATE: July 12, 2019

SUBJECT: Final Order for the 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 Environmental Assessment Worksheet (EAW) for the proposed project in the City of Saint Paul, Minnesota (see Attachment A). This Scoping document is part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a.

In addition to providing information and input, the Scoping document was intended to set the boundaries of the AUAR and identify the scenarios to be analyzed for review. The notice of availability for the Draft AUAR Order and Scoping document was published in the Minnesota Environmental Quality Board's *EQB Monitor* on June 10, 2019. The 30-day public comment period began on June 10, 2019 and closed at 4:00 PM on July 10, 2019.

AUAR Study Area

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

Development Scenarios

Two development scenarios will be studied in the AUAR, both of which are consistent with the *Ford Site Zoning and 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 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

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

Figure 1: AUAR Study Area



During the public comment period, six agency comments and 109 public comments were received. The following agencies provided comments:

- US Army Corps of Engineers
- Minnesota Department of Transportation
- Minnesota Pollution Control Agency
- Office of the State Archaeologist
- Minnesota State Historic Preservation Office
- Metropolitan Council

Pursuant to Minnesota Rules, part 4410.3610, subpart 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. Pursuant to Minnesota Rules, part 4410.3610, subpart 5a(D), the RGU shall apply the criteria for excluding an alternative from analysis found under part 4410.2300, item G, in determining if a suggested additional scenario or alternative to a specific project should be included or excluded. Part 4410.2300, item G, states: “[a]n alternative may be excluded from analysis in the EIS if it would not meet the underlying need for or purpose of the project, it would likely not have any significant environmental benefit compared to the project as proposed, or another alternative, of any type, that will be analyzed in the EIS would likely have similar environmental benefits but substantially less adverse economic, employment, or sociological impacts.”

Comments received from members of the public included the suggestion to modify the geographic boundary of the AUAR study area by including “Area C.” Area C is a 22-acre parcel located west of the Ford Site, along the Mississippi River and up to the bluff edge of Mississippi River Boulevard. This area contains a steam plant and wastewater treatment plant that served the main assembly plant, as well as a former dump site. The purpose of the AUAR is to study development proposed within the area covered by the *Ford Site Zoning and Public Realm Master Plan*. Because Area C is not part of the master plan and there are no development plans proposed for this area, adding it to the study area would not be consistent with the purpose of the project. Another commenter suggested that the study area should be redefined as the Highland National Golf Course in lieu of the area within the *Ford Site Zoning and Public Realm Master Plan*. As with Area C, the Highland National Golf Course is not part of the master plan and there are no development plans proposed for this area; therefore, redefining the study area to be the Highland National Golf Course would not be consistent with the purpose of the project.

Comments received from members of the public also included the suggestion to study the minimum development range from the *Ford Site Zoning and Public Realm Master Plan* or other lower density scenarios. The *Ford Site Zoning and Public Realm Master Plan* and the City’s official controls establish minimum density and land use requirements for the area within the *Ford Site Zoning and Public Realm Master Plan*. Development scenarios that would result in lower densities or alternative land uses that are not currently permitted would not be consistent with the purpose of the project, and there are no such development plans proposed within the study area. Review of the proposed development proposal and the maximum permitted density scenario will necessarily include review of the potential environmental impacts and mitigation strategies that may result from a lower density scenario; therefore, review of the permitted minimum density range is not likely to identify any significant environmental benefits compared to the project as proposed.

Responses to comments from agencies are included in Attachment B, and copies of the comment letters are included in Attachment D. Public comments are summarized and responses to those comments are included in Attachment C. The public comment letters are included in Attachment E.

Attachment A

Scoping Environmental Assessment Worksheet (EAW)

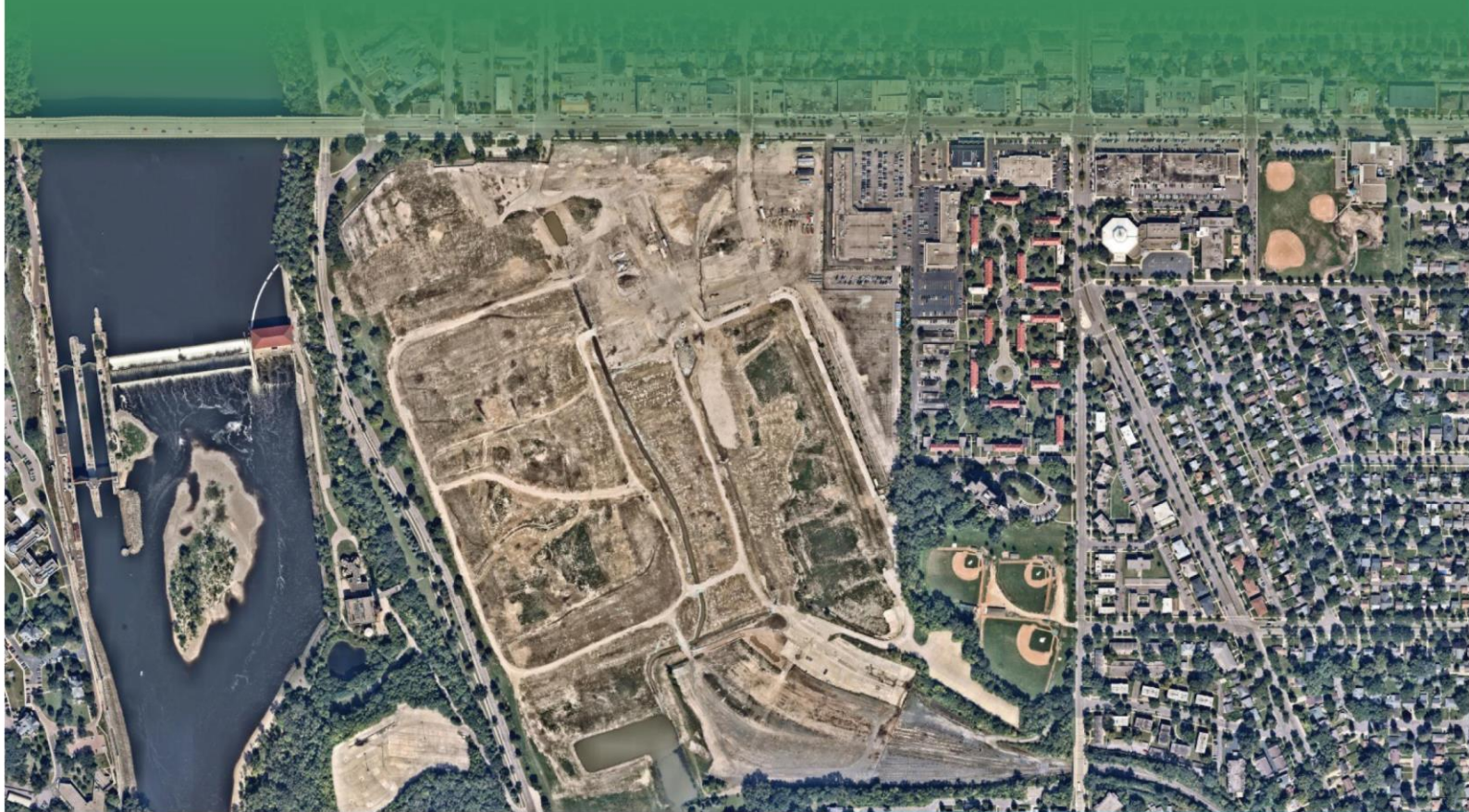


FORD SITE

A 21st Century Community

SCOPING ENVIRONMENTAL ASSESSMENT WORKSHEET (EAW)

JUNE 2019



Prepared for



In cooperation with



Prepared by **Kimley»Horn**

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July 2013 Version

Environmental Assessment Worksheet

This Environmental Assessment Worksheet (EAW) form and EAW Guidelines are available at the Environmental Quality Board's website at: <http://www.eqb.state.mn.us/EnvRevGuidanceDocuments.htm>.

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*.

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 4th 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 (¼, ¼, Section, Township, Range): NE ¼ and SE ¼ of Section 17, Township 28N, Range 23W

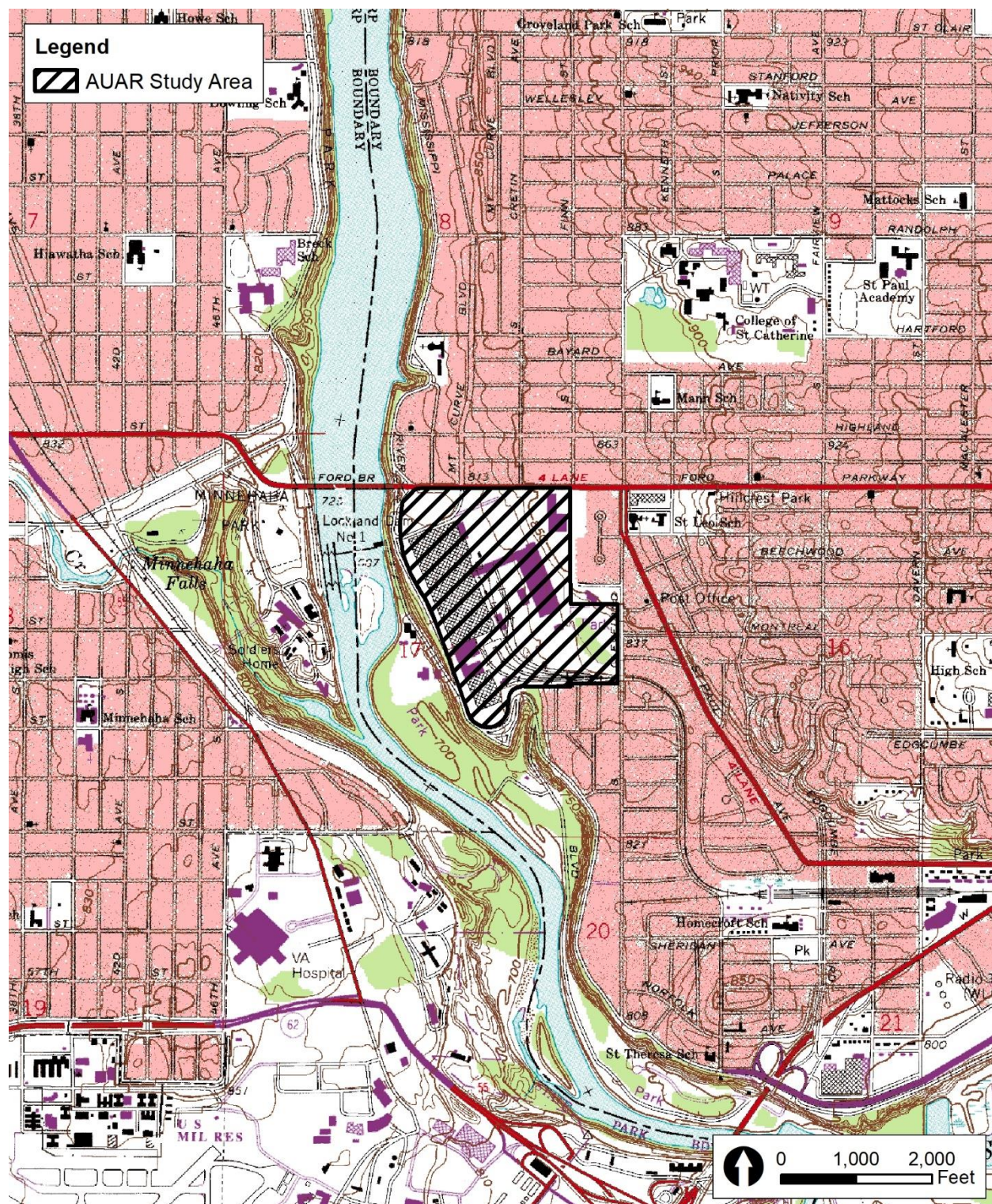
Watershed (81 major watershed scale): Mississippi River – Twin Cities

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



Legend

- AUAR Study Area
- Parcel Boundaries

Burg & Wolfson (Lunds & Byerlys)
4 acres

Ford Site
122 acres

Canadian Pacific Railway
13 acres

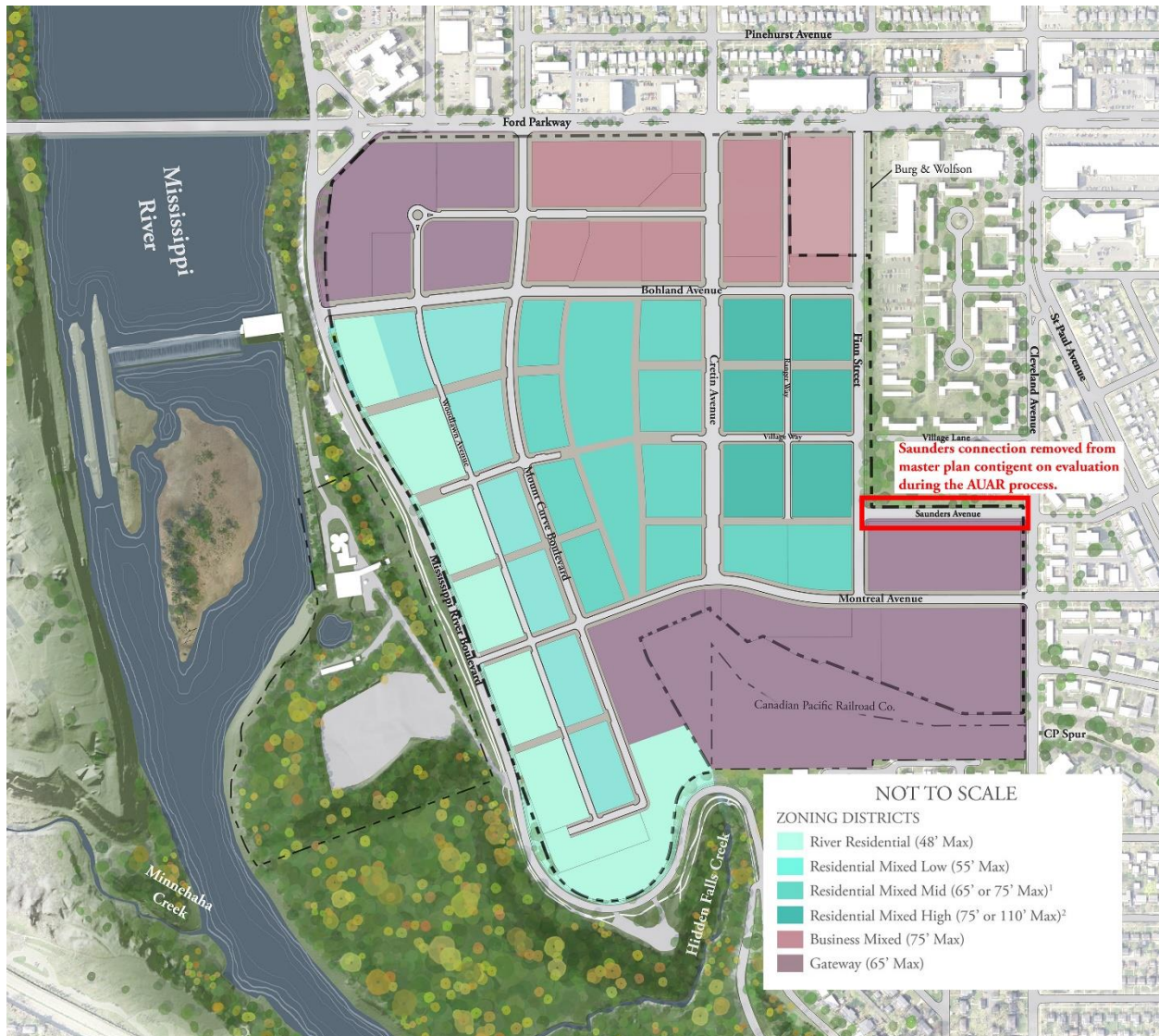
Mississippi River
Mississippi River Blvd
S Woodlawn Ave
S Mt Curve Blvd
W Highland Pkwy
S Gretn Ave
W Pinehurst Ave
Ford Pkwy
W Hillcrest Ave
Bohland Ave
St Paul Ave
S Cleveland Ave
Yorkshire Ave
Villard Ave
Colby St
Village Ln
Inner Dr

Hidden Falls Regional Park

0 300 600 Feet

Aerial: Nearmap, September 7, 2018

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



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:

- *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.

Table 1: Development Scenarios

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

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*.

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)*
 - *Cropland*
 - *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 Health	Sealing of Monitoring Wells	To be applied for
	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 Services	Plumbing Permits	To be applied for
	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 Improvements	To be applied for
	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.

Figure 5: Parks and Trails



- 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.**

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.

Table 3: Zoning District Summary

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

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.

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

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.

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).

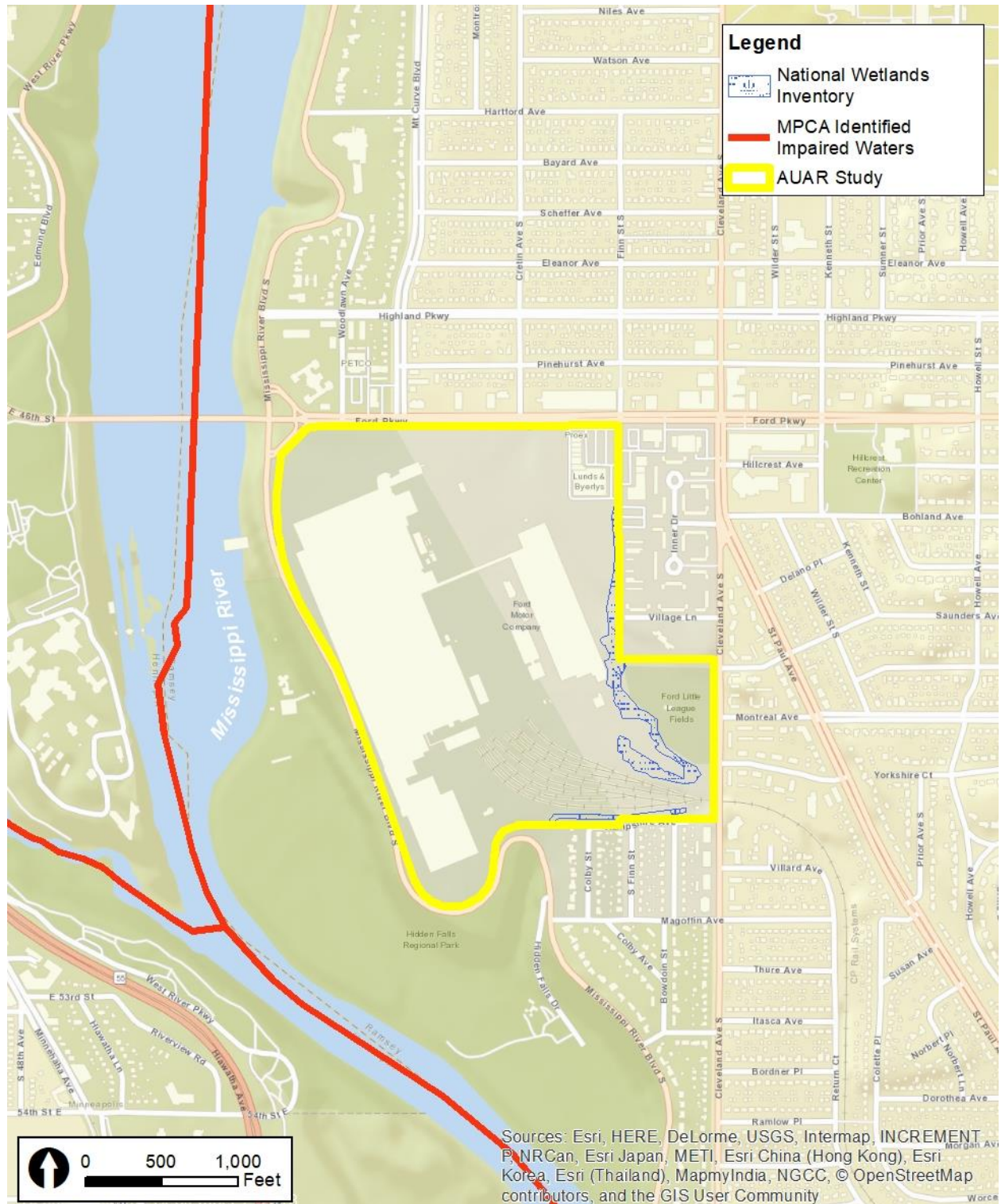
Table 5: Impaired Waters

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

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.**

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 active 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.**

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.*
- *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 post-development. 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 right-of-way, and a preliminary review indicates that the existing infrastructure is sufficient for the anticipated development scenarios.

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 quantity 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.**

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.**

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.

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.

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.¹ 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.

¹ 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.**

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, 46th 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.

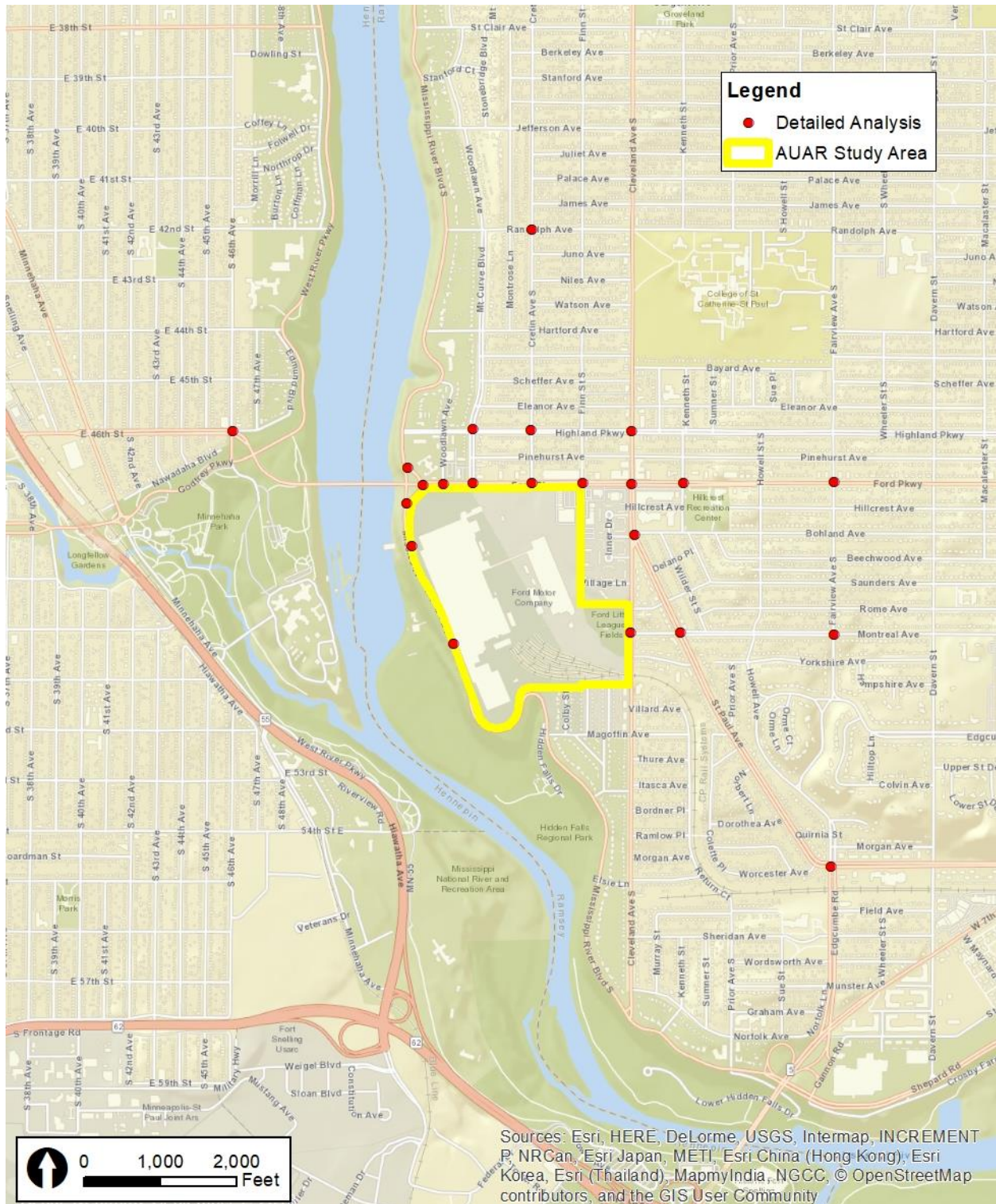
A traffic impact study will be completed for the AUAR. The traffic impact study will estimate traffic generation, evaluate traffic impacts, and determine potential improvements and mitigations. The traffic impact study will include intersection capacity analyses for intersections immediately adjacent 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.

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 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.

Attachment B

Responses to Agency Comments

1. Overview

Pursuant to Minnesota Rules, part 4410.3610, subpart 5a, governmental units and interested persons were invited to comment concerning the specific boundary of the geographic area within which the review will apply and the specific development scenarios to be reviewed. Part 4410.3610, subpart 5a, authorizes such commenters to suggest additional development scenarios and potential development sites outside of the proposed geographic boundary. Responsive comments, as well as comments beyond the scope of part 4410.3610, subpart 5a, are summarized below. Comments beyond the scope of part 4410.3610, subpart 5a, will be addressed in the Alternative Urban Areawide Review (AUAR).

2. US Army Corps of Engineers

Comment	Response
<p>The water resources section of the EAW referenced above indicates that the Ford project site may contain aquatic resources that could potentially be regulated under Section 404 of the Clean Water Act (CWA Section 404). Based on the AUAR and EAW a Department of the Army (DA) permit may be required for your proposed activity, as described below.</p> <p>If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under CWA Section 404. Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at http://www.mvp.usace.army.mil/regulatory.</p> <p>The Corps evaluation of a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).</p> <p>If the proposal requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (40 CFR § 230.10(a)). Time and money spent on the proposal prior to applying for a Section 404 permit cannot be factored into the Corps' decision whether there is a less damaging practicable alternative to the proposal.</p> <p>If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process.</p> <p>A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.</p>	<p>A Section 404 permit will be included in the list of anticipated permits and approvals in the AUAR and applied for if required.</p>

3. Minnesota Department of Transportation

Comment	Response
Traffic Impact Study (TIS)	
<p>On page 28 of the Scoping Order, Section 18 b. Transportation states: “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.” MnDOT recommends that in addition to MN 5 and MN 55, the study area also include MN 51 (both Snelling and Montreal Avenues) and MN 62/Crosstown Highway.</p> <p>More generally, it will be important that in addition to information about motor vehicle trips, the TIS also provides information about total person trips by all modes, as well as anticipated reductions in vehicular GHG emissions that will be achieved.</p> <p>Because of the wide range of potential traffic and related multimodal transportation impacts to be evaluated, MnDOT recommends that the TIS scope be developed in consultation with stakeholders, including City of Saint Paul, Highland District Council, Ramsey County, Metropolitan Council, and MnDOT.</p>	<p>The AUAR traffic analysis will include a planning level review of regional roadways including MN 5, MN 55, and MN 51. However, MN 62 is further south of the study area and the overall impact of the proposed development on MN 62 operations is expected to be minimal.</p> <p>Anticipated mode split will be identified in the traffic impact study and the potential Travel Demand Management strategies will be identified in the TIS to reduce trips and maximize transit and alternate modes which will reduce vehicular emissions.</p> <p>The AUAR traffic analysis will focus on vehicle trips; in addition, person trips via transit, biking, and walking will also be incorporated into the study.</p>
Transit	
<p>Enhancements to the frequencies and facilities for existing transit services along the east and north sides of the redevelopment site should be included and evaluated in the AUAR. Also, the AUAR should develop and evaluate new opportunities to bring transit service to the Ford Site’s interior, including by connecting existing transit lines with those that are being planned along the CP Rail corridor and West 7th Street Riverview Corridor.</p>	<p>The Ford Site is served by existing transit, including A Line bus rapid transit (BRT), as well as Routes 23, 46, 70, 74, 84, and 134 in varying frequencies and destinations.</p> <p>Preliminary discussions with Metro Transit indicate the future potential to reroute some bus routes through the Ford Site, primarily along Cretin Avenue and Montreal Avenue. Additional dialogue with Metro Transit will occur as development progresses to evaluate the routing of buses within and around the Ford Site.</p> <p>The AUAR traffic analysis will not include the assumption of a future Riverview Corridor transit spur serving the Ford Site</p>

Comment	Response
	because the funding and timing of that project is not currently known or reasonably anticipated.
Multimodal Planning	
<p>The Transportation Section (pages 29-30) of the scoping worksheet focuses on motor vehicle traffic. In addition, the unique size and opportunity of this project merit a broader multimodal approach. The AUAR should emphasize comprehensive multimodal approaches to transportation and accessibility that meet the needs of all the stakeholders who will live in, work in, and travel to this development and surrounding areas.</p> <p>Because this development will influence travel within the project boundaries and the wider adjacent transportation network, MnDOT recommends that the AUAR present and analyze performance measures for improving multimodal network connectivity, including (but not limited to): access to destinations; level of traffic stress for bicyclists and pedestrians; number of “person trips”; and multimodal levels of service.</p> <p>Importantly, the AUAR should incorporate universal design as a primary goal and evaluation measure for all transportation facilities.</p> <p>MnDOT notes that enhanced shared lanes (“sharrows”) are proposed on high-volume multi-lane streets surrounding the development. However, these may be inadequate for anticipated on-street bicycle use, especially if bikes are to increase their share of trips. The AUAR will benefit from and should include analysis of bicycle and pedestrian use of these streets to help identify shortcomings and plan for future high-quality facilities on them, as well as on the new streets within the development itself, to better serve pedestrians and cyclists.</p> <p>The AUAR should evaluate alternatives that:</p> <ul style="list-style-type: none"> • Maximize pedestrian and bicycle connectivity to Mississippi River Boulevard, especially with respect to the stated goal of minimizing motor vehicle connectivity to it. 	<p>Analysis of the multimodal aspects of the site will be included in the traffic study.</p> <p>The AUAR traffic analysis will focus on vehicle trips, while assessing and integrating, as applicable, the 2017 Multimodal Transportation study analysis and recommendations. The AUAR will continue to analyze the scenarios based on a comprehensive transportation network framed around all modes of transportation, mobility, and connectivity.</p>

Comment	Response
<ul style="list-style-type: none"> Maximize pedestrian and bicycle connectivity to existing and future transit services. Deliver high quality design and implementation of streets, street crossings, intersections, and bike/pedestrian facilities. Give operational priority and convenience to pedestrians, bicyclists, and transit users. <p>Multimodal alternatives should be evaluated at the intersection locations shown on Figure 8 of the scoping order document, as well as at transit stops and stations.</p>	

4. Minnesota Pollution Control Agency

Comment	Response
Permits and Approvals	
<p>This section indicates that a Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE) for project related wetland impacts may be necessary. Please be aware that if a USACE Section 404 Individual Permit is required for any project activity, then an MPCA CWA Section 401 Water Quality Certification, with antidegradation assessment, or waiver must also be obtained as part of the permitting process.</p>	<p>The Section 401 Water Quality Certification will be added and applied for if required to the list of anticipated permits and approvals in the AUAR.</p>
Wastewater	
<p>The MPCA recommends the following items be discussed in the AUAR:</p> <ul style="list-style-type: none"> Design wastewater flow calculations for average daily flow and peak flow. The total number of each development type and the design flow per unit should be itemized. Table 1 is a good summary of the unit types. If different, per unit, design flows are used for the same land use type, those should also be listed. 	<p>Wastewater design flows, routing of the sanitary sewer, and capacity of the wastewater treatment plant will be considered in the wastewater analysis for the AUAR.</p>

Comment	Response
<p>For example, residential development may have different design flow per unit for single-family, townhome, or apartments.</p> <ul style="list-style-type: none"> • The sewer connection locations to the city sewer, direction of flow, and the sewer route to the wastewater treatment plan should be mapped. • The design capacity, current flow, and capacity after the redevelopment should be shown for sewers downstream to the waste water treatment plant (WWTP). • The capacity of the WWTP and capability to access this increased flow should be discussed. 	
Stormwater	
<p>The MPCA recommends the AUAR provide detailed information on intended stormwater management for the site both during construction and post construction. It is advised that the Project proposer utilize the redevelopment opportunity to improve stormwater management over pre-development conditions. Efforts should be made to retain stormwater onsite vs. discharge to the Mississippi River. Examples include incorporating green space into the design and minimizing impervious areas. Methods include creating bio infiltration areas vs. ponds unless prohibited due to soil conditions. The MPCA recommends the Project proposer make use of pervious pavements, green roofs and/or tree boxes or other Low Impact Development methods.</p>	<p>Detailed site plans are not available for this AUAR evaluation; therefore, a range of assumptions will be considered.</p> <p>The AUAR will illustrate the ground cover of the Ford Site prior to demolition of the manufacturing facility, today's condition, and post-development impervious conditions and how stormwater management will be addressed for each scenario within the AUAR.</p>
<p>Because the site construction will be more than 50 acres in size and because the Mississippi River and Minnehaha Creek have construction-related impairments, the Stormwater Pollution Prevention Plan for the site will need review by the MPCA prior to construction stormwater permit application.</p>	<p>Comment noted. A Construction Stormwater Permit will be applied for prior to starting construction.</p>
Transportation	
<p>Regarding the traffic impact study, the AUAR should address any mitigation measures identified in the analysis.</p>	<p>The AUAR will describe the findings of the traffic impact study, including recommended mitigation measures.</p>

5. Office of the State Archaeologist

Comment	Response
<p>Although no archaeological site is currently recorded within the proposed project area, it is situated within site lead 21RAk (Rumtown, ghost town). The study area is also located in close proximity to the Mississippi River and its confluence with Minnehaha Creek, as well as being within one mile of multiple archaeological sites. Because of these factors the study area has a high potential for containing unrecorded archaeological sites. The project area also contains areas that may have undisturbed or minimally disturbed soils. Therefore, I recommend a qualified archaeologist conduct a survey to determine if the project could damage unrecorded Pre-contact or Historical period archaeological sites.</p>	<p>Most of the AUAR study area is highly disturbed due to the previous development of the Ford Site Assembly Plant, development of Burg & Wolfson (Lunds & Byerlys) property, and the soil remediation activities within the 122-acre Ford site parcel and within a portion of the Canadian Pacific Railway property. The only areas of the study area that contain undisturbed or minimally disturbed soils are located on the Canadian Pacific Railway property.</p> <p>There are currently no development proposals for the 13-acre Canadian Pacific Railway property. An archaeological survey will be included as a requirement of the mitigation plan prior to development on those parcels.</p>

6. State Historic Preservation Office

Comment	Response
<p>Section 14 of the Scoping Environmental Assessment Worksheet (SEAW) references, but does not provide documentation in support of, the opinion by the City that due to the "highly disturbed nature of the site, no archaeological resources are anticipated within the AUAR study area" and therefore an archaeological survey is not "anticipated."</p> <p>State archaeological site records indicate that previously recorded site 21RAk (Rumtown) is located in the project area. Also, there are several recorded archaeological sites on both sides of the Mississippi River in the vicinity of the project. Based upon our assessment of the nature and location of the proposed project, as well as consideration of the minimal documentation provided to our office in reference to previous ground disturbance within the project area, our office recommends, as a first step, the preparation of a Phase IA literature search and archaeological assessment. This Phase IA literature search and archaeological assessment should include archival research and analysis of Sanborn Insurance maps for the project area in order to determine the history of land use, including documentation pertaining to the extent</p>	<p>The AUAR will include additional information on the location and extent of previous site disturbance. The only areas of the AUAR study area that contain undisturbed or minimally disturbed soils are located on the Canadian Pacific Railway property.</p> <p>There are currently no development proposals for the 13-acre Canadian Pacific Railway property. An archaeological survey will be included as a requirement of the mitigation plan prior to development on those parcels.</p>

Comment	Response
<p>(horizontal and vertical) of previous ground disturbance, and assess the potential for both intact subsurface pre-contact archaeological and historic archaeological features. The Phase IA assessment should include a recommendation made by a qualified archaeologist, as well as one specializing in historical archaeology, as to whether further field survey is warranted prior to project implementation. We recommend that you coordinate a review of the Phase IA survey report with our office.</p>	
<p>Section 14 of the SEAW references the "historical survey report" a copy of which was included in your June 4th submittal. Our records indicate that we have never received or been requested by the City to review this earlier historic property evaluation for the Ford Motor Company Twin Cities Assembly Plant, which has now been demolished.</p> <p>Although not mentioned in the SEAW, our records indicate the presence of several designated historic properties within the immediate project area:</p> <ul style="list-style-type: none"> • Minnesota Soldiers Home Historic District – listed in the National Register of Historic Places (NRHP) • Minnehaha Historic District – listed in the NRHP • Bridge No. 3575 (Intercity, or Ford Parkway, Bridge) – listed in the NRHP • Ford Hydroelectric Facilities – eligible for listing in the NRHP • Lock & Dam No. 1 (Ford Dam) – eligible for listing in the NRHP <p>Although it does not appear that the above historic properties will be directly impacted by the proposed development project, we recommend that the City confirm this and also evaluate the potential for any secondary, or indirect effects, that the proposed project may cause – including visual, atmospheric, auditory, access, use, and associated traffic changes – to these historic properties.</p> <p>Our records indicate that other areas surrounding the project site have not been comprehensively surveyed for the presence of historic/architectural properties. As with our recommendation above regarding a Phase IA archaeological literature review and assessment, we recommend that the City undertake and complete a similar survey, typically a Phase I reconnaissance-level survey, for historic/architectural properties 45 years or older which may be directly or indirectly affected by the proposed project.</p>	<p>The historical survey report completed in 2007 for the majority of the AUAR study area will be summarized in the AUAR.</p> <p>The recommendation to complete a Phase I survey of historic/architectural properties is noted. More information will be provided in the AUAR.</p>

Comment	Response
Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.	Comment noted.

7. Metropolitan Council

Comment	Response
Cover Types	
The discussion of Cover Types notes that "a map of anticipated development in relation to the cover types will be included in the AUAR." To better understand future water demand, Council staff request an identification of cover types/areas where irrigation is anticipated (ballfields, lawns, etc.). Similarly, the AUAR would benefit from discussion of groundwater, which would also benefit from acknowledging the excavations present in the study area and potential hazards they pose, along with any mitigation strategies.	The AUAR will discuss the proposed cover types including lawn and landscaped areas. The AUAR will also discuss groundwater and excavations that may be required for the development of the proposed development scenarios.
Land Use	
<p>The Scoping EAW describes two possible redevelopment scenarios:</p> <ol style="list-style-type: none"> 1. The Ryan Cos. scenario: 3,800 housing units, 150,000 sf of retail space, 265,000 sf of office space, and 50,000 sf of civic and institutional space; and 2. Ford Site Master Plan maximum redevelopment: 4,000 housing units, 300,000 sf of retail space, 450,000 sf of office space, and 150,000 sf of civic and institutional space. <p>The eventual development will affect the Transportation Analysis Zone (TAZ) forecast allocation for this area. A preliminary set of TAZ forecasts for 2040 has been prepared by the Council. TAZ #2063 includes the Ford site and a small amount of the fully-developed,</p>	Comment noted. The City will continue to monitor the employment and households within the TAZs in the future and will coordinate as needed. The 2016 TAZ allocations preceded the 2017 adoption of the <i>Ford Site Zoning and Public Realm Master Plan</i> . The City will update the TAZ allocations as part of the 2040 Comprehensive Plan adoption process. The AUAR will address the Mississippi River Critical Corridor Area (MRCCA).

Comment	Response
<p>mixed-use neighborhood west of Cleveland Avenue. Preliminary TAZ allocations provided in 2016 by the City of St. Paul show TAZ #2063 growth of 1,950 households and 3,550 employment during 2014-40. The City should revise this forecast allocation, per expected development.</p> <ul style="list-style-type: none"> • The Ryan Cos. scenario implies 2020-2040 growth of 3,800 households, 8,550 population, and 900 jobs. • Ford Site Master Plan maximum redevelopment implies 2020-2040 growth of 4,000 housing units, 9,000 population, and 1,600 jobs. <p>These households, population, and jobs can be balanced with lower forecast allocations for other St. Paul TAZs with less development potential. These adjustments do not merit a community-wide forecast revision. TAZ forecast allocations must be submitted with the upcoming 2040 Comprehensive Plan for St. Paul; they can be revised with a future plan amendment for the Ford site area.</p> <p>The City of St. Paul submitted their 2040 Comprehensive Plan (Plan) for review by the Metropolitan Council on July 2, 2019. The Plan is currently within the 15-day completeness review. The City will receive a response from the Council by July 24, 2019. Based on the submitted draft of the Plan, which is subject to revisions, the study site is currently consistent with the City's proposed 2040 Comprehensive Plan. Once the environmental review is complete, the AUAR and subsequent changes to land use must be consistent with the City's Plan which may require a comprehensive plan amendment.</p> <p>At the time of writing this letter, the City does not have an approved Mississippi River Critical Corridor Area (MRCCA) Plan. Discussion of zoning requirements in the City's MRCCA plan must be included in the AUAR once available.</p>	
<p>Council staff recently reviewed a Master Plan Update for the Hidden Falls Crosby Farm Regional Park adjacent to the AUAR Site. The Master Plan proposes a number of improvement projects to restore environmental components and enhance access and recreational opportunities within the Park.</p> <p>One of the projects proposed in the Master Plan is to "[R]estore Hidden Falls Creek to incorporate water quality treatment and habitat enhancement in coordination with Ford site redevelopment." The AUAR site stormwater management system that is proposed will have significant direct impacts upon the stability and health of Hidden Falls Creek in the</p>	<p>The City will continue to coordinate internally and with Capitol Region Watershed District, Ramsey County, and the Minnesota Department of Natural Resources regarding restoration efforts planned for the creek downstream of the site.</p>

Comment	Response
<p>lower third of the watershed. It may be advantageous to undertake the restoration of the lower reach of the Creek within the Park before AUAR site runoff volumes increase as a result of AUAR site redevelopment.</p> <p>Council staff requests that the AUAR document evaluate the most expedient and cost-effective time to carry out restoration of the lower reach of the Creek, based upon increased access from the upper reach and future increases in runoff volume during AUAR site redevelopment. If there is consensus that there is a "most efficient and cost-effective time" to undertake the restoration of Hidden Falls Creek in the lower third of the watershed (below Mississippi River Boulevard) during the AUAR site redevelopment timeline, Council staff requests that the AUAR site developer work with Saint Paul Parks to coordinate and implement the Hidden Falls Creek restoration accordingly.</p> <p>Having the entire Creek restored and stabilized will improve the effectiveness of all other proposed vegetation and habitat restoration and management projects, both on the AUAR site and within Hidden Falls Crosby Farm Regional Park.</p>	
Geology, Soils, and Topography/Land Forms	
<p>Council staff request acknowledgement of the excavations present in the study area (Ford Motors mining tunnels) and the potential hazards they pose. The AUAR document should discuss mitigation strategies to address these potential hazards. The discussion of groundwater would also benefit from acknowledging the excavations present in the study area and potential hazards they pose, and mitigation strategies. The Scoping EAW notes that "the AUAR will further investigate the status of the wells located within the study area and will provide mitigation strategies." The Council requests that well locations and additional information resulting from this investigation be also shared with Minnesota Department of Health.</p>	<p>The mining tunnels have been sealed and are not anticipated to impact development.</p> <p>Additional information regarding the wells on the site will be addressed in the AUAR.</p>
<p>The EAW notes that "[c]onstruction dewatering may be required for the development of the AUAR study area". Per the AUAR Guidance, specific information about the appropriation and the potential impacts of this appropriation should be given. The discussion of Water Appropriation also needs to address water mains to service the AUAR study area.</p>	<p>Potential dewatering activities and potential water appropriation permits will be addressed in the AUAR.</p>

Comment	Response
Water Resources – Wastewater	
<p>The AUAR needs to include household and employment forecasts for each Scenario including an ultimate build out. The AUAR should also include the Projected Wastewater Flow for each Scenario including the ultimate buildout. The expected timing for each buildout scenario should also be included.</p>	<p>The AUAR will address wastewater flow for the proposed development scenarios.</p>
Water Resources – Stormwater	
<p>The document states that 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" and that "potential best management practices (BMPs), including the central stormwater retention system will be addressed."</p> <p>Council staff requests that the AUAR incorporate as reference attachments or provide links to allow for direct access to any technical site design study documents generated during the design of the site's central stormwater runoff retention system.</p>	<p>Comment noted.</p>
Water Resources – Water Appropriation	
<p>The discussion of Groundwater on page 20 notes that "[t]he AUAR will further investigate the status of the wells located within the study area and will provide mitigation strategies." Well locations and additional information resulting from this investigation should also be shared with MDH.</p>	<p>Comment noted.</p>
<p>The EAW discusses water appropriation and notes that "[c]onstruction dewatering may be required for the development of the AUAR study area". Per the AUAR Guidance, Council Staff requests that the preparer provide specific information about the appropriation and the potential impacts of this appropriation should be given. The discussion of water appropriation also addresses water mains to service the study area. Council Staff request that the AUAR include information about a range of future water demand projections for 2020, 2030, and 2040 based on different assumptions of residential and commercial water use, efficiency, and reuse.</p>	<p>Information regarding water demand will be included in the AUAR.</p>

Comment	Response
Transportation	
<p>The AUAR must address availability of transit, discuss impacts of the project on regional transportation and any improvements, and identify measures that will be taken to minimize or mitigate project related transportation effects. As such, Metro Transit will continue to discuss with the City and Ryan Companies about how transit serves the Ford Site. The final AUAR needs to study existing transit and how the build out would affect future transit needs. For effects on traffic congestion for the AUAR site and adjacent neighborhoods, Council staff requests that the AUAR study transit improvements including incorporation of bus layover or a transit center included into, but not limited to, any future planned parking ramps within the study area.</p> <p>Specifically, if there is a desire for existing Metro Transit routes to serve the core of the Ford Site in the future, then Council Staff requests that the AUAR consider the existing transit on the periphery of the site and future incorporation of transit within the interior of the new development. Street design of extensions of Montreal and Cretin Avenues should consider turning radii for transit vehicles.</p>	<p>Within the AUAR and associated traffic study, the impacts of the proposed development scenarios on the existing transportation system will be further analyzed and potential mitigation measures will be presented based on all modal assumptions and criteria.</p> <p>Transportation modal integration within the Ford Site is illustrated in the approved and amended <i>Ford Site Zoning and Public Realm Master Plan</i>.</p> <p>The AUAR will not address a layover or transit center; however, transit services are integrated into the overall transportation network. Detailed design and permitting of the internal road system will address radii and turning movements for anticipated vehicle use. The AUAR will not address these specific requests.</p>
<p>Council staff request that the AUAR study multimodal traffic impacts including pedestrian and bicycle modes. The scoping EAW references documenting "the availability of transit and other transportation modes," and the final AUAR needs to specify that the traffic impacts to be studied will include those for pedestrians and bicyclists.</p> <p>Intersections adjacent to the AUAR study area that are identified in Figure 8 for detailed analysis are important for pedestrian and bicyclist travel along and across these roads, and this analysis should be multimodal.</p> <p>Council staff request that the AUAR evaluate alternatives that maximize the opportunities with the Ford site development for implementing the Regional Bicycle Transportation Network Tier 1 corridor and alignments.</p>	<p>A multimodal transportation network will be addressed in the AUAR including connectivity and infrastructure for biking, walking, and transit.</p> <p>Intersection analysis within the AUAR will evaluate all movements.</p>

Attachment C

Thematic Responses to Public Comments

1. Introduction

In addition to the agency comments addressed in Attachment B, comments on the Draft Alternative Urban Areawide Review (AUAR) Order and Scoping Environmental Assessment Worksheet (EAW) were received from 109 members of the public. Copies of the public comments received are included in Attachment E.

Twelve themes related to the AUAR were identified in the public comments received as summarized in Table 1.

Table 1: Public Comment Themes

Code	Theme	Number of Comments
1	AUAR study area	6
2	Development scenarios	64
3	Density and type of development	29
4	Traffic	84
5	Multi-modal transportation	19
6	Wildlife	5
7	Water resources	5
8	Contamination/hazardous materials	66
9	Air	65
10	Noise	64
11	Infrastructure and community services	67
12	Cumulative potential effects	1

Pursuant to Minnesota Rules, part 4410.3610, subpart 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. Responsive comments, as well as comments beyond the scope of part 4410.3610, subpart 5a, are summarized below. Comments beyond the scope of part 4410.3610, subpart 5a, will be addressed in the AUAR. Responses are provided by theme in Section 2. Section 3 provides an index of the public comments received and the themes included in each.

2. Comment Responses by Theme

Code	Theme	Summary	Response
1	AUAR study area	<p>Some comments requested that “Area C” be included in the AUAR study area. Area C is a 22-acre parcel located west of the Ford Site, along the Mississippi River and up to the bluff edge of Mississippi River Boulevard. This area contains a steam plant and wastewater treatment plant that served the main assembly plant, as well as a former dump site.</p> <p>One commenter requested that Ford Parkway be included in the AUAR study area.</p> <p>One commenter suggested developing the Highland National Golf Course instead of the Ford Site.</p>	<p>Area C is not part of the <i>Ford Site Zoning and Public Realm Master Plan</i>. Additionally, Area C is currently zoned industrial, and there are no development plans proposed for this area. Additionally, if there were any plans presented for the development of Area C it would undergo a public process and require approvals from the City and relevant regional and state agencies. Therefore, the AUAR study area will not be revised to include Area C.</p> <p>Detailed analysis of traffic-related impacts on Ford Parkway will be included in the AUAR, resulting from the development of the 122-acre Ford Site Parcel, and the adjacent Burg & Wolfson (Lunds & Byerlys) property, and Canadian Pacific Railway property.</p> <p>There are no development plans proposed for the Highland National Golf Course. Alternative sites will not be evaluated in the AUAR.</p>
2	Development scenarios	<p>Some commenters requested that the minimum development range from the <i>Ford Site Zoning and Public Realm Master Plan</i> be included as a development scenario in the AUAR.</p> <p>Other commenters proposed additional development scenarios with lower densities. Two commenters also</p>	<p>The <i>Ford Site Zoning and Public Realm Master Plan</i> had over a decade of community input and over 100 meetings that resulted in the master plan that was adopted by City Council in September of 2017 and amended in April of 2019.¹</p> <p>Density was addressed at the time of adoption in 2017, which resulted in a range of units and other uses being identified in the master plan (see the Minimum and Maximum columns in the table below).</p>

¹ More information on adoption of the master plan and how public comments were considered as part of the master plan process is available at <https://stpaul.legistar.com/View.ashx?M=F&ID=5395161&GUID=269D0211-AB5B-47A8-8494-ECB92BB00224>

Code	Theme	Summary	Response																				
		proposed a scenario with light manufacturing land use.	<p>The Ryan Development Scenario and the Master Plan Maximum Development Scenario are within the range established by the adopted and amended master plan. These scenarios are greater than the minimum development range identified in the master plan. The AUAR will address the Master Plan Maximum Development Scenario and will, therefore, encompass the minimum development values.</p> <p>No additional scenarios will be evaluated.</p> <table> <tr> <th><i>Land Uses</i></th><th><i>Minimum</i></th><th><i>Maximum</i></th><th><i>Ryan Proposal</i></th></tr> <tr> <td><i>Housing</i></td><td>2,400 dwelling units</td><td>4,000 dwelling units</td><td>3,800 dwelling units</td></tr> <tr> <td><i>Retail and Service</i></td><td>150,000 sq. ft. GFA</td><td>300,000 sq. ft. GFA</td><td>150,000 sq. ft. GFA</td></tr> <tr> <td><i>Office and Employment</i></td><td>200,000 sq. ft. GFA</td><td>450,000 sq. ft. GFA</td><td>265,000 sq. ft. GFA</td></tr> <tr> <td><i>Civic and Institutional</i></td><td>50,000 sq. ft. GFA</td><td>150,000 sq. ft. GFA</td><td>50,000 sq. ft. GFA</td></tr> </table>	<i>Land Uses</i>	<i>Minimum</i>	<i>Maximum</i>	<i>Ryan Proposal</i>	<i>Housing</i>	2,400 dwelling units	4,000 dwelling units	3,800 dwelling units	<i>Retail and Service</i>	150,000 sq. ft. GFA	300,000 sq. ft. GFA	150,000 sq. ft. GFA	<i>Office and Employment</i>	200,000 sq. ft. GFA	450,000 sq. ft. GFA	265,000 sq. ft. GFA	<i>Civic and Institutional</i>	50,000 sq. ft. GFA	150,000 sq. ft. GFA	50,000 sq. ft. GFA
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<i>Civic and Institutional</i>	50,000 sq. ft. GFA	150,000 sq. ft. GFA	50,000 sq. ft. GFA																				
3	Density and type of development	<p>There was a mix of comments regarding what types of development are desired and how the uses are distributed across the study area. Some comments expressed support for more affordable housing and distributing single-family and multi-family housing across the site. Some comments stated a general preference for lower density development, more civic and institutional land use, or no development.</p> <p>Some comments asked for more information about or offered</p>	<p>The <i>Ford Site Zoning and Public Realm Master Plan</i> established the vision for the type and density of development. The thousands of ideas and suggestions that the City received over the past 10 years and the more than 100 public meetings informed and shaped the redevelopment framework for the site.</p> <p>The Canadian Pacific Railway property is included in the <i>Ford Site Zoning and Public Realm Master Plan</i> as part of the Gateway zoning district, which is intended to provide an attractive gateway into the site that is focused on employment with some retail and services. However, there is currently no development proposal for this property.</p>																				

Code	Theme	Summary	Response
		suggestions for development on the Canadian Pacific Railway property.	
4	Traffic	Comments expressed concerns about increased traffic volumes and congestion resulting from development within the AUAR study area. Some commenters requested traffic analysis be completed at additional intersections not listed in the Scoping EAW and that the traffic analysis consider variations in traffic due to time of day, time of year, and weather. Others noted concerns about parking in the surrounding neighborhoods and additional truck traffic to serve the proposed development.	A traffic impact study is being conducted, and the results of the analysis will be included in the AUAR. The City defined the scope of analysis in coordination with the Minnesota Department of Transportation (MnDOT), Metro Transit, Ramsey County, Hennepin County, City of Minneapolis, and Minneapolis Parks and Recreation. The intersections to be evaluated in detail for the AUAR are shown on Figure 8 of the Scoping EAW. In addition, the traffic analysis will include a planning level review of regional roadways including MN 5 (7 th Street West), MN 55 (Hiawatha Avenue), and MN 51 (Snelling Avenue).
5	Multi-modal transportation	Comments expressed a desire for the proposed development to be walkable and bikeable and to have more public transportation options. Some comments noted support for the Riverview Corridor to serve the Ford Site.	The AUAR will describe existing bicycle and pedestrian facilities in the AUAR study area, proposed improvements, and compatibility of the development scenarios with the master plan. An assessment of the current and proposed pedestrian and bicycle facilities in the study area will be included in the traffic study. The AUAR will describe existing transit service to the AUAR study area. The AUAR will not include analysis of the Riverview Corridor. The currently identified alternative for the Riverview Corridor is not proposed to provide service to the Ford Site. A separate environmental analysis of the Riverview Corridor will be conducted by Ramsey County. ²

² More information on the Riverview Corridor is available at www.riverviewcorridor.com.

Code	Theme	Summary	Response
6	Wildlife	Comments stated concerns about impacts to wildlife within the study area and a desire for habitat to remain.	The AUAR will describe existing habitat and any known rare plant and animal species. Potential impacts to species and habitat will be discussed, along with any mitigation measures needed.
7	Water resources	Comments noted concerns about impacts to water quality, wetlands, and water resources including the Mississippi River, Hidden Falls, and Hidden Falls Creek. Some comments also expressed concerns about impacts to the Mississippi River Corridor Critical Area (MRCCA).	The AUAR will describe impacts to water quality, wetlands, and water resources while addressing the MRCCA overlay requirements.
8	Contamination/ hazardous materials	Comments requested evaluation of potential impacts due to contamination of Area C.	<p>Area C is not part of the <i>Ford Site Zoning and Public Realm Master Plan</i>, and there are no development plans proposed for this area. Therefore, the AUAR study area will not be revised to include Area C.</p> <p>Ford Motor Company (Ford) is the responsible party for Area C and is coordinating with the Minnesota Pollution Control Agency (MPCA). Ford is currently engaged in the following activities related to Area C:</p> <ul style="list-style-type: none"> Ford is preparing a Feasibility Study for Area C, which is expected to be submitted to the MPCA in 2019; however, there is no required timetable. The Feasibility Study is intended to evaluate cleanup alternatives to be presented to the MPCA. Ford is completing quarterly collection of groundwater samples from the 11 monitoring wells, with additional sampling events triggered by flood conditions.

Code	Theme	Summary	Response
			<ul style="list-style-type: none"> Ford is measuring groundwater levels to see how the water table at Area C fluctuates in response to changing river conditions. <p>Additional information regarding Area C is available from the MPCA at https://www.pca.state.mn.us/waste/saint-paul-ford-site#areac.</p>
9	Air	Comments requested evaluation of vehicle emissions, including emissions of particular matter.	As described in the Scoping EAW, the AUAR will not include a carbon monoxide hot spot analysis in accordance with the screening method developed by MnDOT and approved by the US Environmental Protection Agency. A qualitative discussion of mobile source air toxics, including diesel particulate matter/diesel exhaust organic gases, will be included in the AUAR.
10	Noise	Comments requested an evaluation of potential increases in noise due to construction and post-construction sources such as traffic, air handling units, and ongoing activities at the site.	The AUAR will discuss noise during construction and applicable regulations. As described in the Scoping EAW, based on the anticipated changes in traffic volumes, changes in traffic noise levels are not anticipated to be readily perceptible; therefore, traffic-generated noise will not be evaluated.
11	Infrastructure and community services	Comments requested an evaluation of impacts on infrastructure, including roads and city storm and sanitary infrastructure, and on community services such as schools, libraries, police, and firefighting services.	<p>The <i>Ford Site Zoning and Public Realm Master Plan</i> includes development of a vehicular street grid within the AUAR study area. Impacts to transportation operations will be addressed in the AUAR.</p> <p>The AUAR will also address how the development scenarios will impact the capacity of the existing watermain and sanitary sewer system.</p> <p>Community services were evaluated during the <i>Ford Site Zoning and Public Realm Master Plan</i> process.</p>

Code	Theme	Summary	Response
12	Cumulative potential effects	One comment indicated that Highland Village Apartments, located at 845 S Cleveland Avenue on the east side of the AUAR study area, may pursue a multi-family infill project with 120-180 dwelling units on the southwest corner of their property.	The City was advised on July 12, 2019 by a representative of the Highland Village Apartments property that there are no plans at this time to proceed with an infill development.

3. Index of Public Comments

Comment Number ³	Name	Themes Addressed in Comment											
		1: AUAR Study Area	2: Development Scenarios	3: Density and Type of Development	4: Traffic	5: Multi-Modal Transportation	6: Wildlife	7: Water Resources	8: Contamination/Hazardous Materials	9: Air	10: Noise	11: Infrastructure and Community Services	12: Cumulative Potential Effects
1	Dale Jernberg					✓							
2	Barbara Vaile			✓									
3	Roger and Beth Maulik				✓								
4	Anne Lynch			✓									
5	James Stolpestad	✓				✓							
6	Lori Johnson				✓		✓						
7	Christen Pentek			✓	✓		✓	✓					
8	R.A.Y.			✓									
9	Merrit Clapp-Smith												✓
10	Harold Samtur				✓								
11	Chris Larson				✓								
12	JP Dees			✓	✓	✓							
13	Schuyler Luetmer			✓	✓	✓							
14	Nathan Bortz			✓		✓							
15	Katie Traxler			✓	✓								
16	Kent Petterson			✓	✓	✓		✓					
17	Michael Allan Brewer			✓									
18	Joe Wallick			✓									
19	Matthew Clark			✓									

³ Multiple comments submitted by the same person are grouped under one comment number.

Comment Number ³	Name	Themes Addressed in Comment											
		1: AUAR Study Area	2: Development Scenarios	3: Density and Type of Development	4: Traffic	5: Multi-Modal Transportation	6: Wildlife	7: Water Resources	8: Contamination/ Hazardous Materials	9: Air	10: Noise	11: Infrastructure and Community Services	12: Cumulative Potential Effects
20	Mark Kirchner	✓		✓	✓								
21	Lynnette Kayser			✓		✓							
22	Lori Tracy				✓								
23	Brandon Jutz				✓	✓		✓					
24	Winston Kaehler			✓		✓							
25	Donald Kist			✓				✓					
26	Claire Mathews-Lingen	✓		✓	✓	✓			✓	✓	✓	✓	
27	Julia Stein Dittberner		✓		✓				✓	✓	✓	✓	
28	Anne Keenan		✓		✓				✓	✓	✓	✓	
29	Deb Dornfeld		✓		✓				✓	✓	✓	✓	
30	Jean Hoppe		✓		✓				✓	✓	✓	✓	
31	Marijo Wunderlich		✓		✓				✓	✓	✓	✓	
32	Angela Junker		✓		✓				✓	✓	✓	✓	
33	Kristin Sullivan		✓		✓				✓	✓	✓	✓	
34	Margaret Killeen		✓		✓				✓	✓	✓	✓	
35	Margaret Fuller Corneille		✓		✓				✓	✓	✓	✓	
36	Jim McQuillan		✓		✓				✓	✓	✓	✓	
37	Mark Seuntjens		✓		✓				✓	✓	✓	✓	
38	Barbara Mingo		✓		✓				✓	✓	✓	✓	
39	Ann Stark		✓		✓				✓	✓	✓	✓	
40	Yu-Mao Tsai		✓		✓				✓	✓	✓	✓	
41	Jan Martland		✓		✓				✓	✓	✓	✓	
42	John Wittenstrom and Kathleen Hetrick		✓		✓				✓	✓	✓	✓	

Comment Number ³	Name	Themes Addressed in Comment											
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43	David Fox		✓		✓				✓	✓	✓	✓	
44	Katie Shaw		✓		✓				✓	✓	✓	✓	
45	Andrew Traxler		✓		✓				✓	✓	✓	✓	
46	Anne Brataas		✓		✓				✓	✓	✓	✓	
47	Anselmo C. Castelán		✓		✓				✓	✓	✓	✓	
48	Susan Crosby		✓		✓				✓	✓	✓	✓	
49	Elvira Anzueto-Ramirez		✓		✓				✓	✓	✓	✓	
50	Janine McQuillan		✓		✓				✓	✓	✓	✓	
51	Jacob Olson		✓		✓				✓	✓	✓	✓	
52	Colleen Traxler		✓		✓				✓	✓	✓	✓	
53	Bobbette Axelrod		✓		✓				✓	✓	✓	✓	
54	A Platt		✓		✓				✓	✓	✓	✓	
55	Bruce Hoppe	✓	✓	✓	✓				✓	✓	✓	✓	
56	Andrew Singer	✓				✓							
57	Jay Severance			✓		✓							
58	Rosalyn Segal			✓	✓								
59	Thomas L Romens		✓		✓	✓							
60	Russ Yttri			✓									
61	Deborah Katz		✓		✓		✓	✓	✓	✓	✓	✓	
62	Mary Firestone	✓							✓				
63	Lynn Varco		✓		✓				✓	✓	✓	✓	
64	Kathryn McGuire		✓		✓				✓	✓	✓	✓	
65	Molly Barrett		✓		✓				✓	✓	✓	✓	
66	Camille McCa		✓		✓				✓	✓	✓	✓	

Comment Number ³	Name	Themes Addressed in Comment											
		1: AUAR Study Area	2: Development Scenarios	3: Density and Type of Development	4: Traffic	5: Multi-Modal Transportation	6: Wildlife	7: Water Resources	8: Contamination/ Hazardous Materials	9: Air	10: Noise	11: Infrastructure and Community Services	12: Cumulative Potential Effects
67	Philip Cochran and Mary Nichols		✓		✓				✓	✓	✓	✓	
68	Jutta Crowder		✓		✓				✓	✓	✓	✓	
69	Nolan Zavoral		✓		✓				✓	✓	✓	✓	
70	Kevin Mencke		✓		✓				✓	✓	✓	✓	
71	Eric Hansen		✓		✓				✓	✓	✓	✓	
72	Howard Miller		✓		✓				✓	✓	✓	✓	
73	Maggie LaNasa		✓		✓				✓	✓	✓	✓	
74	Andrew and Kate Burda		✓										
75	Janet Munson		✓		✓				✓	✓	✓	✓	
76	Clare Hayes		✓		✓				✓	✓	✓	✓	
77	Margy Peterson		✓		✓				✓	✓	✓	✓	
78	Dr. Christa Treichel		✓		✓				✓	✓	✓	✓	
79	Liz Hathaway Castelán		✓		✓				✓	✓	✓	✓	
80	Beth Brombach		✓		✓				✓	✓	✓	✓	
81	Joanne Routzahn		✓		✓				✓	✓	✓	✓	
82	Matt McGuire		✓		✓				✓	✓	✓	✓	
83	Matt Reinartz		✓		✓				✓	✓	✓	✓	
84	Kathryn and Ron Bennett		✓		✓				✓	✓	✓	✓	
85	Heather Guggemos		✓		✓				✓	✓	✓	✓	
86	John Patterson		✓		✓				✓	✓	✓	✓	
87	Deborah Patterson		✓		✓				✓	✓	✓	✓	
88	Kevin Wier		✓		✓				✓	✓	✓	✓	
89	Dianne Ploetz		✓		✓				✓	✓	✓	✓	
90	James A Schoettler				✓	✓							

Comment Number ³	Name	Themes Addressed in Comment											
		1: AUAR Study Area	2: Development Scenarios	3: Density and Type of Development	4: Traffic	5: Multi-Modal Transportation	6: Wildlife	7: Water Resources	8: Contamination/ Hazardous Materials	9: Air	10: Noise	11: Infrastructure and Community Services	12: Cumulative Potential Effects
91	Tim, Maria, Ben, Lucy and Luke Smith			✓	✓								
92	Mathews Hollinshead			✓	✓	✓							
93	Catherine Dienhart		✓		✓				✓	✓	✓	✓	
94	Nora Nell Hamburge		✓		✓				✓	✓	✓	✓	
95	Jim Ginther		✓		✓				✓	✓	✓	✓	
96	Ute Bertog		✓		✓				✓	✓	✓	✓	
97	Elisa Hayday			✓	✓		✓		✓	✓		✓	
98	Daniel Schriver		✓		✓				✓	✓	✓	✓	
99	Charles Hathaway		✓		✓				✓	✓	✓	✓	
100	Gregory P Struve			✓		✓							
101	Luba Hickey			✓									
102	Sherry Goodman			✓		✓							
103	Susan Duffy				✓		✓					✓	
104	Wendy Matthews			✓									
105	Heidi Schallberg					✓							
106	James Winterer			✓									
107	Catherine Hunt				✓				✓	✓	✓	✓	
108	Peggy Lynch				✓								
109	Eileen Mackin					✓						✓	
Total		6	64	29	84	19	5	5	66	65	64	67	1

Attachment D

Agency Comment Letters



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
180 FIFTH STREET EAST, SUITE 700
ST. PAUL, MN 55101-1678

July 11, 2019

Regulatory File No. 2019-01314-MMJ

City of St. Paul
c/o Menaka Mohan- Ford Site Planner
25 W. 4th St., Ste. 1400
St. Paul, MN 55102

Dear Ms. Mohan:

This letter is in response to the Draft Alternative Urban Areawide Review (AUAR) and Scoping Environmental Assessment Worksheet (EAW) that we received for the Ford Site, which includes 139 acres along the Mississippi River in the Highland Park Neighborhood in the City of St. Paul. This letter contains our initial comments on this project for your consideration. The water resources section of the EAW referenced above indicates that the Ford project site may contain aquatic resources that could potentially be regulated under Section 404 of the Clean Water Act (CWA Section 404). Based on the AUAR and EAW a Department of the Army (DA) permit may be required for your proposed activity, as described below.

If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under CWA Section 404. Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps evaluation of a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

If the proposal requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (40 CFR § 230.10(a)). Time and money spent on the proposal prior to applying for a Section 404 permit cannot be factored into the Corps' decision whether there is a less damaging practicable alternative to the proposal.

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

Regulatory Branch (File No. 2019-01314-MMJ)

If you have any questions, please contact me in our St. Paul office at (651) 290-5363 or Melissa.m.jenny@usace.army.mil. In any correspondence or inquiries, please refer to the Regulatory file number shown above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melissa Jenny".

Melissa Jenny
Project Manager

cc:
Rebecca Roberts, Kimley-Horn

July 1, 2019

Menaka Mohan, Ford Site Planner
City of Saint Paul
25 W 4th Street, Suite 1400
Saint Paul, MN 55102

SUBJECT: Scoping Order for Ford Site AUAR
MnDOT Review # AUAR19-002
SE quad of Ford Pkwy and Mississippi River Blvd
City of Saint Paul, Ramsey County

Dear Ms. Mohan:

Thank you for the opportunity to review the June 10, 2019 Scoping Order for the Alternative Urban Areawide Review (AUAR) for the above referenced project. As plans for this project continue to be refined, we welcome the opportunity to meet with the project partners and to review updated information. MnDOT has the following comments on the scoping order:

Traffic Impact Study (TIS)

On page 28 of the Scoping Order, Section 18 b. Transportation states: “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.”

MnDOT recommends that in addition to MN 5 and MN 55, the study area also include MN 51 (both Snelling and Montreal Avenues) and MN 62/Crosstown Highway.

More generally, it will be important that in addition to information about motor vehicle trips, the TIS also provides information about total person trips by all modes, as well as anticipated reductions in vehicular GHG emissions that will be achieved.

Because of the wide range of potential traffic and related multimodal transportation impacts to be evaluated, MnDOT recommends that the TIS scope be developed in consultation with stakeholders, including City of Saint Paul, Highland District Council, Ramsey County, Metropolitan Council, and MnDOT.

Please be in contact with Ashley Roup of MnDOT’s Metro District Traffic Engineering Section at Ashley.Roup@state.mn.us or 651-234-7815 regarding the TIS.

Transit

Enhancements to the frequencies and facilities for existing transit services along the east and north sides of the redevelopment site should be included and evaluated in the AUAR. Also, the AUAR should develop and evaluate new opportunities to bring transit service to the Ford Site’s interior, including by connecting existing transit lines with those that are being planned along the CP Rail corridor and West 7th Street Riverview Corridor.

Please direct related questions to Carl Jensen, MnDOT’s Metro District Transit Advantages Engineer at Carl.Jensen@state.mn.us or 651-234-7505.

Multimodal Planning

The Transportation Section (pages 29-30) of the scoping worksheet focuses on motor vehicle traffic. In addition, the unique size and opportunity of this project merit a broader multimodal approach. The AUAR should emphasize comprehensive multimodal approaches to transportation and accessibility that meet the needs of all the stakeholders who will live in, work in, and travel to this development and surrounding areas.

Because this development will influence travel within the project boundaries and the wider adjacent transportation network, MnDOT recommends that the AUAR present and analyze performance measures for improving multimodal network connectivity, including (but not limited to): access to destinations; level of traffic stress for bicyclists and pedestrians; number of “person trips”; and multimodal levels of service.

Importantly, the AUAR should incorporate universal design as a primary goal and evaluation measure for all transportation facilities.

MnDOT notes that enhanced shared lanes (“sharrows”) are proposed on high-volume multi-lane streets surrounding the development. However, these may be inadequate for anticipated on-street bicycle use, especially if bikes are to increase their share of trips. The AUAR will benefit from and should include analysis of bicycle and pedestrian use of these streets to help identify shortcomings and plan for future high quality facilities on them, as well as on the new streets within the development itself, to better serve pedestrians and cyclists.

The AUAR should evaluate alternatives that:

- Maximize pedestrian and bicycle connectivity to Mississippi River Boulevard, especially with respect to the stated goal of minimizing motor vehicle connectivity to it.
- Maximize pedestrian and bicycle connectivity to existing and future transit services.
- Deliver high quality design and implementation of streets, street crossings, intersections, and bike/pedestrian facilities.
- Give operational priority and convenience to pedestrians, bicyclists, and transit users.

Multimodal alternatives should be evaluated at the intersection locations shown on Figure 8 of the scoping order document, as well as at transit stops and stations.

Please continue to coordinate multimodal planning with Mackenzie Turner Barga, MnDOT’s Metro District Pedestrian & Bicycle Coordinator, at Mackenzie.Turnerbarga@state.mn.us or 651-234-7879.

Review Submittal Options

MnDOT’s goal is to review proposed development plans and documents within 30 days of receipt. Electronic file submittals are typically processed more rapidly. There are four submittal options:

1. Email documents and plans in PDF format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. If multiple emails are necessary, number each message.
2. Upload PDF file(s) to MnDOT’s external shared internet workspace site at: <https://mft.dot.state.mn.us>. Contact MnDOT Planning development review staff at metrodevreviews.dot@state.mn.us for access instructions and send an email listing the file name(s) after the document(s) has/have been uploaded.

3. Mail, courier, or hand deliver documents and plans in PDF format on a CD-ROM compact disc to:
MnDOT – Metro District Planning Section
Development Reviews Coordinator
1500 West County Road B-2
Roseville, MN 55113
4. Submit printed documents via U.S. Mail, courier, or hand delivery to the address above.
Include one set of full-size plans.

MnDOT welcomes the opportunity to review updated traffic and transportation information, as well as to meet with representatives of the city, developer, and other agencies. You are welcome to contact me at (651) 234-7795 with questions.

Sincerely,

David Elvin, AICP
Principal Planner

Copy via E-Mail:

Buck Craig, Permits
Carl Jenson, Transit
Ben Klismith, Right-of-Way
Shelia Kauppi, Area Manager
Mark Lindeberg, Area Engineer
Nick Olson, Water Resources

Chris Chatfield, Water Resources
Jeff Rones, Design
Ashley Roup, Traffic
Cameron Muhic, Multimodal
Russell Owen, Metropolitan Council
Heidi Schallberg, Metropolitan Council

July 9, 2019

Menaka Mohan
Ford Site Planner
City of Saint Paul
25 W 4th Street, Suite 1400
St. Paul, MN 55102

Re: Ford Site Scoping Environmental Assessment Worksheet

Dear Menaka Mohan:

Thank you for the opportunity to review and comment on the Scoping Environmental Assessment Worksheet (SEAW) in preparation for an Alternative Urban Areawide Review (AUAR) for the Ford Site project (Project) in the city of St. Paul, Ramsey County, Minnesota. The Project consists of development of the 122 acre Ford Site and three other adjacent parcels. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

Permits and Approvals (Item 8)

This section indicates that a Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE) for project related wetland impacts may be necessary. Please be aware that if a USACE Section 404 Individual Permit is required for any project activity, then an MPCA CWA Section 401 Water Quality Certification, with antidegradation assessment, or waiver must also be obtained as part of the permitting process. The MPCA has attached a draft assessment form to assist with completion of this required assessment. The Section 401 Water Quality Certification ensures that the activity will comply with the state water quality standards. Any conditions required within the MPCA 401 Certificate are then incorporated into the USACE 404 Permit. You can find additional information about the MPCA's 401 Certification process at <https://www.pca.state.mn.us/water/clean-water-act-section-401-water-quality-certifications>. For further information about the 401 Water Quality Certification process, please contact Jim Brist at 651-757-2245 or Jim.Brist@state.mn.us or Bill Wilde at 651-757-2825 or William.wilde@state.mn.us.

Water Resources (Item 11)***Wastewater***

The MPCA recommends the following items be discussed in the AUAR:

- Design wastewater flow calculations for average daily flow and peak flow.
- The total number of each development type and the design flow per unit should be itemized. Table 1 is a good summary of the unit types. If different, per unit, design flows are used for the same land use type, those should also be listed. For example, residential development may have different design flow per unit for single-family, townhome, or apartments.
- The sewer connection locations to the city sewer, direction of flow, and the sewer route to the wastewater treatment plant should be mapped.
- The design capacity, current flow, and capacity after the redevelopment should be shown for sewers downstream to the waste water treatment plant (WWTP).

- The capacity of the WWTP and capability to accept this increased flow should be discussed. Questions regarding wastewater can be directed to Dave Sahli at 651-757-2687 or David.Sahli@state.mn.us.

Stormwater

- The MPCA recommends the AUAR provide detailed information on intended stormwater management for the site both during construction and post construction. It is advised that the Project proposer utilize the redevelopment opportunity to improve stormwater management over pre-development conditions. Efforts should be made to retain stormwater onsite vs. discharge to the Mississippi River. Examples include incorporating green space into the design and minimizing impervious areas. Methods include creating bio infiltration areas vs. ponds unless prohibited due to soil conditions. The MPCA recommends the Project proposer make use of pervious pavements, green roofs and/or tree boxes or other [Low Impact Development methods](#).
- Because the site construction will be more than 50 acres in size and because the Mississippi River and Minnehaha Creek have construction-related impairments, the Stormwater Pollution Prevention Plan for the site will need review by the MPCA prior to construction stormwater permit application. Questions regarding stormwater should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.

Transportation (Item 18)

Regarding the traffic impact study, the AUAR should address any mitigation measures identified in the analysis.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this SEAW, please contact me by email at Karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,



Karen Kromar
Project Manager
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul
Jim Brist, MPCA, St. Paul
Dave Sahli, MPCA, St. Paul
Roberta Getman, MPCA, Rochester
Mehjabeen Rahman, MPCA, St. Paul
Suzanne Hanson, MPCA, Duluth

Minnesota Pollution Control Agency (MPCA) Antidegradation Assessment for Section 401
Water Quality Certification Applicants
7.18.17

In addition to completing the [Joint Application Form for Activities Affecting Water Resources in Minnesota](#), applicants whose proposed projects may require an MPCA Individual 401 Water Quality Certification for work in aquatic resources must also provide the information requested below. This will facilitate the MPCA's review of the proposed project for compliance with the antidegradation water quality standards (Minn. R. 7050.0250 to 7050.0335). Section 401 of the Clean Water Act requires any applicant for a federal license or permit to conduct an activity that may result in a discharge to waters of the United States to obtain certification from the state in which the discharge originates to ensure compliance with state water quality standards. The antidegradation assessment is not required for all projects; if you know that your project will qualify for a U.S. Army Corps of Engineers 404 General Permit or Letter of Permission (LOP), you do not need to fill out this form. If the information requested below is already provided in your Joint Permit Application (JPA), please indicate where.

Applicant/Project Name:

Date:

Environmental Assessment Worksheet (EAW)/Environmental Impact Statement (EIS)

Identify whether an EAW or EIS was prepared (or will be required) for this project, and include the EAW/EIS process completion date.

Analysis of Non-Preferred Alternatives That Avoid and Minimize Degradation

Describe prudent and feasible alternatives that would minimize degradation and avoid or minimize surface water impacts (such as wetlands, lakes, streams, etc.). An analysis of each alternative must include a description of how impacts to surface waters are avoided and/or minimized, and include information on any design considerations and constraints, expected performance, construction, operation, and maintenance costs, and reliability for each alternative.

Preferred Alternative

Provide a description of and justification for the preferred alternative, and verify that the preferred alternative is the least degrading prudent and feasible alternative for surface water. Note: Information in Attachment C of the Joint Application Form for Activities Affecting Water Resources in Minnesota (Application) may be used to help determine if the preferred alternative, relative to other available prudent and feasible alternatives, is appropriate.

Beneficial Uses

Describe the current existing beneficial uses of the surface waters impacted by the project and how the beneficial uses will be protected during and after the project. Review Minnesota Rules 7050.0410-0430 for the classification that fits the existing beneficial uses of the waters impacted by your project. <https://www.revisor.mn.gov/rules/?id=7050>

Indirect Impacts

Where partial alteration of a surface water will occur, describe the potential indirect impacts to the remaining surface water, and the potential impact to nearby wetlands, stream, lakes, etc. When the entire function/acreage of a surface

water is lost, describe the impacts to nearby wetlands, streams, lakes, etc. Indirect impacts can include changes in hydrology, aquatic species health or population, changes in vegetation or macroinvertebrate (bug) populations, etc.

Loading and Degradation to Surface Waters

Describe any anticipated net increases in loading and other causes of degradation expected in surface waters that are not directly filled or dredged when your proposed project preferred alternative is fully implemented.

Water Quality Comparison Before and After Project

Compare and describe the existing water quality at the project site with the anticipated water quality after the project is fully complete and operational. If the surface area of a water resource will be completely filled, this step is not necessary, but must be addressed in the Mitigation Plan below.

Comparison of Existing and Expected Economic Conditions and Social Services

Provide a comparison of existing and expected economic conditions and social services when the proposed project (preferred alternative) is fully implemented. Include description of economic gains or losses attributable to the proposed activity; contribution to social services; prevention/remediation of environmental or public health threats; trade-offs between environmental media; the value of the water resources; and other relevant environmental, social, and economic impacts of the proposed activity.

Description of the Mitigation Plan

If the applicant will mitigate the project's permanent surface water impacts via an approved wetland bank AND the mitigation is type-for-type AND located in the same major watershed (<https://www.pca.state.mn.us/water/watersheds>) the applicant does not need to complete this portion.

Using the project information provided above, describe how the proposed compensatory mitigation will replace existing uses and maintain the current level of water quality at the proposed project site (e.g. wetland types, replacement ratio, water monitoring data if available).

Describe how the compensatory mitigation will be maintained and the monitoring activities that will be conducted to ensure the proposed mitigation is viable. Include a timeline for reporting progress and an intervention/remediation plan to be implemented if the mitigation fails.

July 8, 2019

Menaka Mohan
Ford Site Planner
City of St Paul
25 W 4th St, Ste 1400
St Paul, MN 55102
FordSitePlanning@ci.stpaul.mn.us

Re: AUAR: Ford Site and Adjacent Parcels

Dear Menaka Mohan,

I appreciate being given the opportunity to comment on the above listed project. Although no archaeological site is currently recorded within the proposed project area, it is situated within site lead 21RAk (Rumtown, ghost town). The study area is also located in close proximity to the Mississippi River and its confluence with Minnehaha Creek, as well as being within one mile of multiple archaeological sites. Because of these factors the study area has a high potential for containing unrecorded archaeological sites. The project area also contains areas that may have undisturbed or minimally disturbed soils. Therefore I recommend a qualified archaeologist conduct a survey to determine if the project could damage unrecorded Pre-contact or Historical period archaeological sites.

The Minnesota Historical Society maintains a list of qualified archaeologists at:
<http://www.mnhs.org/preservation/directory>.

Please contact me if you have any questions or concerns.

Sincerely,

Jennifer Tworzyanski

Jennifer Tworzyanski
Assistant to the State Archaeologist
Office of the State Archaeologist
Kellogg Center
328 West Kellogg Blvd
St. Paul, MN 55102
jennifer.tworzyanski@state.mn.us
651-201-2265

July 11, 2019

Menaka Mohan
Ford Site City Planner
City of St. Paul
25 W. 4th Street, Suite 1400
St. Paul, MN 55102

RE: Ford Site Redevelopment
St. Paul, Ramsey County
SHPO Number: 2019-1850

Dear Menaka Mohan:

Thank you for providing our office with a copy of the Scoping Environmental Assessment Worksheet (SEAW) for the above referenced project.

Based upon information provided in the SEAW and the City of St. Paul's follow up submittal to our office (dated June 4, 2019), we understand that Ryan Companies is proposing to develop a 122-acre site which is the location of the former Ford Motor Company's Twin Cities Assembly Plant. The proposed development would include residential, retail/service, office/employment, and civic/institutional land uses.

We have reviewed the information provided under section 14. *Historic Properties* of the SEAW, along with the documentation included with your June 4th submittal which included the historic property evaluation report titled *Ford Motor Company Twin Cities Assembly Plant: An Assessment of Significance and Eligibility, 966 South Mississippi River Boulevard, Saint Paul, Ramsey County, Minnesota* (Hess, Roise and Company; November 2007).

Our comments as they pertain to adequate identification of historic properties, including archaeological resources, as well as consideration of potential effects to identified historic properties which may be caused by the proposed development project, are provided below.

Archaeology

Section 14 of the SEAW references, but does not provide documentation in support of, the opinion by the City that due to the "highly disturbed nature of the site, no archaeological resources are anticipated within the AUAR study area" and therefore an archaeological survey is not "anticipated."

State archaeological site records indicate that previously recorded site 21RAk (Rumtown) is located in the project area. Also, there are several recorded archaeological sites on both sides of the Mississippi River in the vicinity of the project. Based upon our assessment of the nature and location of the proposed project, as well as consideration of the minimal documentation provided to our office in reference to previous ground disturbance within the project area, our office recommends, as a first step, the preparation of a Phase IA literature search and archaeological assessment. This Phase IA literature search and archaeological assessment should include archival research and analysis of Sanborn Insurance maps for the project area in order to determine the history of land use, including documentation pertaining to the extent (horizontal and vertical) of previous ground disturbance, and assess the potential for both intact subsurface pre-contact archaeological and historic archaeological features. The Phase IA assessment should include a recommendation made by a qualified archaeologist, as well as one specializing in historical archaeology, as to whether further field survey is warranted prior to project implementation. We recommend that you coordinate a review of the Phase IA survey report with our office.

Architecture/History Properties

Section 14 of the SEAW references the "historical survey report" a copy of which was included in your June 4th submittal. Our records indicate that we have never received or been requested by the City to review this earlier historic property evaluation for the Ford Motor Company Twin Cities Assembly Plant, which has now been demolished.

Although not mentioned in the SEAW, our records indicate the presence of several designated historic properties within the immediate project area:

- Minnesota Soldiers Home Historic District – listed in the National Register of Historic Places (NRHP)
- Minnehaha Historic District – listed in the NRHP
- Bridge No. 3575 (Intercity, or Ford Parkway, Bridge) – listed in the NRHP
- Ford Hydroelectric Facilities – eligible for listing in the NRHP
- Lock & Dam No. 1 (Ford Dam) – eligible for listing in the NRHP

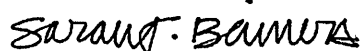
Although it does not appear that the above historic properties will be directly impacted by the proposed development project, we recommend that the City confirm this and also evaluate the potential for any secondary, or indirect effects, that the proposed project may cause - including visual, atmospheric, auditory, access, use, and associated traffic changes - to these historic properties.

Our records indicate that other areas surrounding the project site have not been comprehensively surveyed for the presence of historic/architectural properties. As with our recommendation above regarding a Phase IA archaeological literature review and assessment, we recommend that the City undertake and complete a similar survey, typically a Phase I reconnaissance-level survey, for historic/architectural properties 45 years or older which may be directly or indirectly affected by the proposed project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project or wish to consult further with our office regarding recommendations presented in this letter, please contact me at (651) 201-3290 or sarah.beimers@state.mn.us.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

cc via email only:

Amanda Gronhøvd, Office of the State Archaeologist

July 9, 2019

Ms. Menaka Mohan, Ford Site Planner
City of St. Paul
25 W. 4th Street, Suite 1400
St. Paul, MN 55102

RE: City of St. Paul Ford Site Scoping Environmental Assessment Worksheet (EAW)
Metropolitan Council Review No. 22290-1
Metropolitan Council District No. 14

Dear Ms. Mohan:

The Metropolitan Council received the Scoping EAW for the Ford Site project in St. Paul on June 7, 2019. The proposed project is located generally south of Ford Parkway, west of Cleveland Avenue north of Hampshire Avenue, and east of Mississippi River Boulevard. The proposed development consists of approximately 139 acres in the following four parcels: 122 acres of the former Ford Assembly Plant with the adjacent 4 acres of Burg and Wolfson parcels (Lunds & Byerlys site), and also the adjacent 13 acres of Canadian Pacific Railway land.

The following sections offer comments regarding issues that are required to be addressed in the forthcoming Alternative Urban Areawide Review (AUAR) for the document to be complete for regional system review. In addition, the staff offers advisory comments regarding technical information that should be included in the AUAR.

Item 7 Cover Types (Lanya Ross, 651-602-1803)

The discussion of Cover Types notes that "a map of anticipated development in relation to the cover types will be included in the AUAR." To better understand future water demand, Council staff request an identification of cover types/areas where irrigation is anticipated (ballfields, lawns, etc.). Similarly, the AUAR would benefit from discussion of groundwater, which would also benefit from acknowledging the excavations present in the study area and potential hazards they pose, along with any mitigation strategies.

Item 9. Land Use (Patrick Boylan, 651-602-1438, Todd Graham, 651-602-1322)

The Scoping EAW describes two possible redevelopment scenarios:

1. The Ryan Cos. scenario: 3,800 housing units, 150,000 sf of retail space, 265,000 sf of office space, and 50,000 sf of civic and institutional space; and
2. Ford Site Master Plan maximum redevelopment: 4,000 housing units, 300,000 sf of retail space, 450,000 sf of office space, and 150,000 sf of civic and institutional space.

The eventual development will affect the Transportation Analysis Zone (TAZ) forecast allocation for this area. A preliminary set of TAZ forecasts for 2040 has been prepared by the Council. TAZ #2063 includes the Ford site and a small amount of the fully-developed, mixed-use neighborhood west of Cleveland Avenue. Preliminary TAZ allocations provided in 2016 by the City of St. Paul show TAZ #2063 growth of 1,950 households and 3,550 employment during 2014-40. The City should revise this forecast allocation, per expected development.

- The Ryan Cos. scenario implies 2020-2040 growth of 3,800 households, 8,550 population, and 900 jobs.
- Ford Site Master Plan maximum redevelopment implies 2020-2040 growth of 4,000 housing units, 9,000 population, and 1,600 jobs.

These households, population, and jobs can be balanced with lower forecast allocations for other St. Paul TAZs with less development potential. These adjustments do not merit a community-wide forecast revision. TAZ forecast allocations must be submitted with the upcoming 2040 Comprehensive Plan for St. Paul; they can be revised with a future plan amendment for the Ford site area.

The City of St. Paul submitted their 2040 Comprehensive Plan (Plan) for review by the Metropolitan Council on July 2, 2019. The Plan is currently within the 15-day completeness review. The City will receive a response from the Council by July 24, 2019. Based on the submitted draft of the Plan, which is subject to revisions, the study site is currently consistent with the City's proposed 2040 Comprehensive Plan. Once the environmental review is complete, the AUAR and subsequent changes to land use must be consistent with the City's Plan which may require a comprehensive plan amendment.

At the time of writing this letter, the City does not have an approved Mississippi River Critical Corridor Area (MRCCA) Plan. Discussion of zoning requirements in the City's MRCCA plan must be included in the AUAR once available.

Item 9.b. – Land Use – Compatibility with Nearby Land Uses, Zoning, and Plans
(Jim Larsen, 651-602-1159, Colin Kelly, 651-602-1361)

Council staff recently reviewed a Master Plan Update for the Hidden Falls Crosby Farm Regional Park adjacent to the AUAR Site. The Master Plan proposes a number of improvement projects to restore environmental components and enhance access and recreational opportunities within the Park.

One of the projects proposed in the Master Plan is to “[R]estore Hidden Falls Creek to incorporate water quality treatment and habitat enhancement in coordination with Ford site redevelopment.” The AUAR site stormwater management system that is proposed will have significant direct impacts upon the stability and health of Hidden Falls Creek in the lower third of the watershed. It may be advantageous to undertake the restoration of the lower reach of the Creek within the Park before AUAR site runoff volumes increase as a result of AUAR site redevelopment.

Council staff requests that the AUAR document evaluate the most expedient and cost-effective time to carry out restoration of the lower reach of the Creek, based upon increased access from the upper reach and future increases in runoff volume during AUAR site redevelopment. If there is consensus that there is a “most efficient and cost-effective time” to undertake the restoration of Hidden Falls Creek in the lower third of the watershed (below Mississippi River Boulevard) during the AUAR site redevelopment timeline, Council staff requests that the AUAR site developer work with Saint Paul Parks to coordinate and implement the Hidden Falls Creek restoration accordingly.

Having the entire Creek restored and stabilized will improve the effectiveness of all other proposed vegetation and habitat restoration and management projects, both on the AUAR site and within Hidden Falls Crosby Farm Regional Park.

Item 10 Geology, Soils, and Topography/Land Forms (Lanya Ross, 651-602-1803)

Council staff request acknowledgement of the excavations present in the study area (Ford Motors mining tunnels) and the potential hazards they pose. The AUAR document should discuss mitigation strategies to address these potential hazards. The discussion of groundwater would also benefit from acknowledging the excavations present in the study area and potential hazards they pose, and mitigation strategies. The Scoping EAW notes that "the AUAR will further investigate the status of the wells located within the study area and will provide mitigation strategies." The Council requests that well locations and additional information resulting from this investigation be also shared with Minnesota Department of Health.

The EAW notes that "[c]onstruction dewatering may be required for the development of the AUAR study area". Per the AUAR Guidance, specific information about the appropriation and the potential impacts of this appropriation should be given. The discussion of Water Appropriation also needs to address water mains to service the AUAR study area.

Item 11.b.i. Water Resources - Wastewater (Roger Janzig, 651-602-1119,)

The AUAR needs to include household and employment forecasts for each Scenario including an ultimate build out. The AUAR should also include the Projected Wastewater Flow for each Scenario including the ultimate buildout. The expected timing for each buildout scenario should also be included.

Item 11.b.ii. – Water Resources – Stormwater – Environmental Effects of Proposed Development (Jim Larsen, 651-602-1159)

The document states that 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" and that "potential best management practices (BMPs), including the central stormwater retention system will be addressed."

Council staff requests that the AUAR incorporate as reference attachments or provide links to allow for direct access to any technical site design study documents generated during the design of the site's central stormwater runoff retention system.

Item 11.b.iii. – Water Resources – Water Appropriation – (Lanya Ross, 651-602-1803)

The discussion of Groundwater on page 20 notes that "[t]he AUAR will further investigate the status of the wells located within the study area and will provide mitigation strategies." Well locations and additional information resulting from this investigation should also be shared with MDH.

The EAW discusses water appropriation and notes that "[c]onstruction dewatering may be required for the development of the AUAR study area". Per the AUAR Guidance, Council Staff requests that the preparer provide specific information about the appropriation and the potential impacts of this appropriation should be given. The discussion of water appropriation also addresses water mains to service the study area. Council Staff request that the AUAR include information about a range of future water demand projections for 2020, 2030, and 2040 based on different assumptions of residential and commercial water use, efficiency, and reuse.

Item 18.a. Transportation (Scott Thompson, 612-349-7774)

The AUAR must address availability of transit, discuss impacts of the project on regional transportation and any improvements, and identify measures that will be taken to minimize or mitigate project related transportation effects. As such, Metro Transit will continue to discuss with the City and Ryan Companies about how transit serves the Ford Site. The final AUAR needs to study existing transit and how the build out would affect future transit needs. For effects on traffic congestion for the AUAR site and adjacent neighborhoods, Council staff requests that the AUAR study transit improvements including incorporation of bus layover or a transit center included into, but not limited to, any future planned parking ramps within the study area.

Specifically, if there is a desire for existing Metro Transit routes to serve the core of the Ford Site in the future, then Council Staff requests that the AUAR consider the existing transit on the periphery of the site and future incorporation of transit within the interior of the new development. Street design of extensions of Montreal and Cretin Avenues should consider turning radii for transit vehicles.

Item 18. b Transportation (Russ Owen, 651-602-1724)

Council staff request that the AUAR study multimodal traffic impacts including pedestrian and bicycle modes. The scoping EAW references documenting "the availability of transit and other transportation modes," and the final AUAR needs to specify that the traffic impacts to be studied will include those for pedestrians and bicyclists.

Intersections adjacent to the AUAR study area that are identified in Figure 8 for detailed analysis are important for pedestrian and bicyclist travel along and across these roads, and this analysis should be multimodal.

Council staff request that the AUAR evaluate alternatives that maximize the opportunities with the Ford site development for implementing the Regional Bicycle Transportation Network Tier 1 corridor and alignments.

This concludes the Council's review of the Scoping EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Patrick Boylan, Principal Reviewer, at 651-602-1438.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Kris Fredson, Metropolitan Council District 14
Chai Lee, Metropolitan Council District 13
Patrick Boylan, Sector Representative and Principal Reviewer
Raya Esmaeili, Reviews Coordinator

Attachment E

Public Comment Letters

Roberts, Rebecca

Comment Number: 1

From: Dale Jernberg <djjernberg@gmail.com>
Sent: Tuesday, June 11, 2019 10:38 AM
To: *CI-StPaul_FordSitePlanning
Subject: Bring light rail to the new development

If Metro Transit plans to build light rail down West 7th Street, you would be fools not to consider a branch that would go to the new development at the site of the old Ford Plant. You could use the existing rail right-of-way from where the tracks currently cross West 7th on their way to the old Ford plant.

Make sure to include this in your initial plans so you won't have to move mountains at a later date.

--
Dale Jernberg
4231 Harriet Ave. S.
Mpls, MN 55409

Roberts, Rebecca

Comment Number: 2

From: Barbara Vaile <vaile.b17@gmail.com>
Sent: Tuesday, June 11, 2019 8:41 AM
To: *CI-StPaul_FordSitePlanning
Subject: comment - gardening

I want to live with gardening as exercise, not to mention organic food, ecological awareness, community building, well-being.

Will there be a shoulder season greenhouse compatible to dealing with interruptions in food delivery and climate crisis?

Development needs to be futureproofed, rather than the same old “how much money can we make” model.

Thank you!

Barbara Vaile
Minneapolis

Roberts, Rebecca

Comment Number: 3

From: Roger MAULIK <rmaulik@msn.com>
Sent: Tuesday, June 11, 2019 11:24 AM
To: *CI-StPaul_FordSitePlanning
Subject: Ford development affecting Highland Parkway

I am deeply concerned that the proposed development will severely impact Highland Parkway, the street we live on. We already have drivers speeding on the parkway as they use it as a preferred route over Ford parkway congestion. The addition of thousands of cars and drivers can only increase the density on Highland Parkway. I recommend significant traffic calming features be added to Highland parkway to deter additional drivers. I am not sure how it can be done, but a solution must be found. If not, severely limit parking and auto access to the Highland Parkway development site. Highland parkway cannot absorb more traffic safely. My address is 1847 Highland Parkway.

Thanks for listening
Roger and Beth Maulik

Sent from [Mail](#) for Windows 10

Roberts, Rebecca

Comment Number: 4

From: Anne Lynch-Skow <alynchskow@gmail.com>
Sent: Tuesday, June 11, 2019 12:06 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Plant

To Whom it May Concern:

If there is one thing we know, it is that we have to do whatever it takes to protect the environment. In the interest of public health and of the health of our planet, I strongly urge you to choose Ryan's proposed development plan. The lower density is a crucial factor in protecting our environment from the inevitable fall-out of any urban development. Let St. Paul do its part in keeping that fall-out to a minimum.
Sincerely,

Anne Lynch Highland Park resident.

From: James Stolpestad <jastolpestadii@gmail.com>
Sent: Monday, June 10, 2019 11:24 AM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site AUAR scope

Menaka,

I hope this note finds you well. I am writing to share a couple observations and suggestions for the AUAR and broader planning effort.

The first observation is that for a project that aspires to be so forward thinking about project sustainability, energy use, etc., and “new mobility” focused around walking, biking and transit, the AUAR scope didn’t address those in much detail. Should it? Is it provided for in the enabling legislation?

I’d speculate that a European lense to this effort might solicit some different and important questions:

- What is the current carbon footprint, what is the future footprint under different scenarios?
- How can the development offset such footprint on-site, and how can the municipality mitigate the impacts across a larger geography?
- What are the foot traffic and bike traffic counts on existing infrastructure corridors at the project edge? What might these be under different development scenarios? Are upgrades needed to walking paths and bike paths outside the project footprint to handle the expected connections under different development scenarios? In this regard, it would be great if the current, in my view inadequate, bike lanes north-south along Mississippi River Boulevard and east-west along Highland Parkway could be improved to a dedicated 2-way bike path along the whole stretch of the project boundaries.

I was also curious why the River Parcel wasn’t included in the defined boundary? I had heard that Ryan has an option to purchase the River Parcel, and the two parts seem highly inter-connected in terms of geological and watershed and other features, and impacts thereon.

Thanks.

Jamie
James A. Stolpestad II
203-585-7248
Jastolpestadii@gmail.com

Roberts, Rebecca

Comment Number: 6

From: Lori Johnson <lhjmpls@gmail.com>
Sent: Tuesday, June 11, 2019 6:28 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site comments

Thank you for asking for community comments. I live in Minneapolis, but regularly shop in Highland. I am concerned about the amount of traffic that will result because of the increased housing density. I hope that while you are planning the site, you will keep green and natural spaces in mind. Please provide natural habitat for birds, small creatures, bees, and butterflies.

Thanks.
—Lori Johnson

Online Comment**COMMENT NUMBER: 7****DATE/TIME:** 6/11/2019 8:44:00 AM**NAME:** Christen Pentek**COMMENT:**

My first general concern regards the image on p. 8 of the Ford Site Scoping Environmental Assessment Worksheet EAW, June 2019. The image seems to suggest that higher income living (e.g. "carriage houses") will be closest to the river, while the multi-unit housing will be built over the wetland in a condensed area. This strategy seems to encourage segregation by class, which could lead to stigma of specific blocks as places of stress, crime, and/or illness (similar to Chicago and their neighborhood segregation troubles). I would like to see more mixing of the housing types across the full AUAR site, and considerations for equity in housing so the greatest number of people in the neighborhood have access to the natural and healing resources, such as the trails, river, and Hidden Falls and Minnehaha parks.

For example, The proposed 50,000 square feet of civic and institutional space is only a third of what that space seems to need, at the development 150,000. Would like to see this number much closer. Highland Park is already a neighborhood that has a lot of exclusive, private space. Need the city to champion this space as having public access and being for the people in the neighborhood. Proposed employment space also seems to be lacking, comparing gross 265,000 square feet to 450,000. It is important for people to have jobs to pay for housing. Need to have alignment of this for a healthy neighborhood.

11. I am worried about water reports of the impaired streams; wondering how this project will contribute to increasing/intensifying those levels, would like honest plan for ongoing monitoring and accountability if any further poisoning of our watershed occur at this site during or after the redevelopment process. Perhaps it would make sense to have monitoring of the water contaminants in Hidden Falls Creek. My reasoning for this work is that the water here, in Minnesota but also beyond, is sacred; we need to make sure we are good stewards and taking the utmost care of this resource. The plan seems to suggest that the wetlands would be the site of apartment buildings, which does not seem to be a good idea for either the building or the water.

Although site is not in wellhead protection area or drinking water supply, it seems that the water is related and needs to be given careful consideration and priority. It may also be important to outline specific considerations about water contamination, continuing to address past contamination, potential contamination as a result of the redevelopment efforts, and planning for addressing future contamination as a result of people utilizing the redeveloped sites.

13. It may be important to include in the AUAR considerations for the larger wildlife, in the redevelopment process. This site also has coyotes, lynx, raccoons, eagles, and deer, even if the field crews did not observe this during their data collection; I frequently run along the trail around sunrise and see these diurnal creatures crossing into and out of the AUAR/Ford Plant site.

18b. It may make sense to include the intersection of Woodlawn Ave and Mississippi River boulevard in the review for detailed transit analysis, as that road seems to be implied as a potential road that would

experience significant change in transit both to the south and the north of the project during the redevelopment.

Thank you for all your hard work as the plans for this site move forward. I continue to support a thoughtful way to grow my neighborhood and welcome more folks here.

From: Christen Pentek <pente017@umn.edu>
Sent: Tuesday, June 11, 2019 8:43 AM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site Planning Feedback and Potential Considerations

Hello Menaka Mohan,

Thank you for leading the fielding process as the lead planner for the Ford Redevelopment site. I am excited to hear more details about this process, and am looking forward to welcoming new neighbors to this part of St. Paul.

I have a few areas of concerns after reading through the documents sent in the current plan. I am confident in your team to continue having conversations and securing a way forward that will meet the needs of the current residents (both bipedal and four-leggeds) and our need for preparedness and growth!

I have tried to outline my feedback by the corresponding section from the shared documents. Please let me know if any references or concerns are unclear!

My first general concern regards the image on p. 8 of the Ford Site Scoping Environmental Assessment Worksheet EAW, June 2019. The image seems to suggest that higher income living (e.g. "carriage houses") will be closest to the river, while the multi-unit housing will be built over the wetland in a condensed area. This strategy seems to encourage segregation by class, which could lead to stigma of specific blocks as places of stress, crime, and/or illness (similar to Chicago and their neighborhood segregation troubles). I would like to see more mixing of the housing types across the full AUAR site, and considerations for equity in housing so the greatest number of people in the neighborhood have access to the natural and healing resources, such as the trails, river, and Hidden Falls and Minnehaha parks.

For example, The proposed 50,000 square feet of civic and institutional space is only a third of what that space seems to need, at the development 150,000. Would like to see this number much closer. Highland Park is already a neighborhood that has a lot of exclusive, private space. Need the city to champion this space as having public access and being for the people in the neighborhood. Proposed employment space also seems to be lacking, comparing gross 265,000 square feet to 450,000. It is important for people to have jobs to pay for housing. Need to have alignment of this for a healthy neighborhood.

11. I am worried about water reports of the impaired streams; wondering how this project will contribute to increasing/intensifying those levels, would like honest plan for ongoing monitoring and accountability if any further poisoning of our watershed occur at this site during or after the redevelopment process. Perhaps it would make sense to have monitoring of the water contaminants in Hidden Falls Creek. My reasoning for this work is that the water here, in Minnesota but also beyond, is sacred; we need to make sure we are good stewards and taking the utmost care of this resource. The plan seems to suggest that the wetlands would be the site of apartment buildings, which does not seem to be a good idea for either the building or the water.

Although site is not in wellhead protection area or drinking water supply, it seems that the water is related and needs to be given careful consideration and priority. It may also be important to outline specific considerations about water contamination, continuing to address past contamination, potential contamination as a result of the redevelopment efforts, and planning for addressing future contamination as a result of people utilizing the redeveloped sites.

13. It may be important to include in the AUAR considerations for the larger wildlife, in the redevelopment process. This site also has coyotes, lynx, raccoons, eagles, and deer, even if the field crews did not observe this during their data collection; I frequently run along the trail around sunrise and see these diurnal creatures crossing into and out of the AUAR/Ford Plant site.

18b. It may make sense to include the intersection of Woodlawn Ave and Mississippi River boulevard in the review for detailed transit analysis, as that road seems to be implied as a potential road that would experience significant change in transit both to the south and the north of the project during the redevelopment.

Thank you again for all your work with this project! I look forward to continuing to hear about and be part of the conversation as my neighborhood grows.

In gratitude,

Christen Pentek, MSW

pronouns: they/them/theirs

penteo17@umn.edu

CELL: 507.216.1611

HOME ADDRESS:

723 Woodlawn Ave S, #303

St Paul, MN 55116

"Work is love, made visible." Kahlil Gibran

"Research that produces nothing but books will not suffice." Kurt Lewin

Roberts, Rebecca

Comment
Number:
8

From: rayoungsmn@aol.com
Sent: Monday, June 10, 2019 6:59 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site planning

Menaka Mohan, Ford Site Planner
Dept. Of Planning & Econ. Development
St. Paul, MN

Hi! Menaka,

There is a HUGE need for affordable housing \$100,000-\$200,000 in the Twin Cities. People want to live in single family homes--even if they are smaller. This is especially true for retirees. If you have \$300,000 or more, then you can easily get a house in the Twin Cities right now. There are thousands of us who are looking in the \$100,000-\$200,000 price range.

How about a development that is set up to accommodate this income group? Otherwise we have to wait until the recession hits and watch housing prices plummet again to get some place to live. It's coming quick.

In another state, they made close to zero lot lines and built small, affordable houses. Those homes sold out faster than you can blink your eyes.

Don't make this all about the rich people again. There are thousands of us stuck in the lower incomes who just want a tiny house to call our own.

Too bad that the State cannot pass a law that states x% of homes have to be in this price range. We HATE renting.

R.A.Y.

Roberts, Rebecca

Comment
Number:
9

From: Merritt Clapp-Smith <merritt.clapp-smith@tkda.com>
Sent: Monday, June 10, 2019 9:58 AM
To: *CI-StPaul_FordSitePlanning
Subject: Highland Village Apts

Menaka,

The Highland Village Apartments owners are still determining whether to pursue a multi-family infill project on the SW corner of their site, adjacent to the Ford site. Such a project, if undertaken, could include 120-180 dwelling units. They are likely to decide if and when to pursue it within the next few weeks.

If you think that a development of this size should be identified under 19b, please let me know and I will update you on their plans by the comment deadline.

Thank you,

Merritt



Merritt Clapp-Smith | Planning Market Manager, Senior Planner



444 Cedar Street, Suite 1500, Saint Paul, MN 55101

P **651.726.7902** | C **651-202-0190**

merritt.clapp-smith@tkda.com

TKDA

tkda.com

Roberts, Rebecca

Comment Number: 10

From: Harold Samtur <thmediator@aol.com>
Sent: Monday, June 10, 2019 11:21 PM
To: *CI-StPaul_FordSitePlanning
Subject: transportation

I would just like to say that I think the railroad tracks should include a road to divert traffic coming across the Ford Bridge and going down Cleveland or St. Paul Av. to Highway 5, West Seventh etc. A lane for biking and pedestrians is fine, but one for cars is essential. Harold Samtur, ThMediator@aol.com Resident of Highland Park.

Online Comment**COMMENT NUMBER:** 11**DATE/TIME:** 6/12/2019 11:55:00 AM**NAME:** Chris Larson**COMMENT:**

A prized factor of the river road is few streets emptying onto it. The density of new streets ending at the road exceeds that of most residential areas to the north. I would encourage the developers to reduce these streets ending there by a third, and provide only pedestrian or bicycle crossings. One way to encourage more bicycle traffic is to make certain attractive routes only available to those using non-motorized means of transportation. Secondly, the scope of increased traffic at intersections should be expanded to include an analysis at an intersection entering on Hwy 5 / W 7th from the river road, and at the road's entrance to the next bridge north (Lake/Marshall bridge) as well as the five-way Franklin Ave / 27th / East River Parkway intersection in Minneapolis. All of these intersections will see increased traffic due to a higher number of residents concentrated here, and the five-way intersection is already at capacity in rush hour.

Comment Number: 11

Online Comment**COMMENT NUMBER:** 12**DATE/TIME:** 6/12/2019 8:26:00 AM**NAME:** JP Dees**COMMENT:**

Honestly, the concerns are that the apartments will continue to drive up rental rates in St. Paul, which for graduate students such as myself are becoming a financial burden in my attempts to continue my education in Minnesota. Beyond the increased cost, what will be done about parking? If the new apartments are targeting younger individuals, I still find the public transport options within the cities to be limited. In which case you could assume that nearly half of all individuals living in the units will be bringing a vehicle of some kind to St. Paul and in turn increasing the traffic in and out of the neighborhoods of St. Paul.

Online Comment

COMMENT NUMBER: 13

DATE/TIME: 6/11/2019 6:44:00 PM

NAME: Schuyler Luetmer

COMMENT:

As a resident at the busy intersection of Creitin a Marshall Ave. just north of the development site I have no idea how this sort of development and influx of 3,800 people is possible with the existing transportation infrastructure. This area is already grid locked from 7-9am and 4-6pm every single day making driving a nightmare. Expanding the population of this neighborhood by close to 4,000 residents without updating area transportation infrastructure will make day to day life here impossible.

Ideally you folks would approve no new development and turn the entire parcel into an extension of hidden falls park placing a small boat launch upstream from the ford dam. (There is currently no public way to access pool 1 between the ford damn and St. Anthony Falls, as things stand this privilege is only awarded to the few who can afford a membership at the Minneapolis Boat Club located near the Marshall Avenue bridge.) How un-american! The Mississippi river is OUR national birthright and should be accessible to all, not just a select few, but I digress...

That said I am also a realist and this development would inevitably bring economic growth to the area. I would push for some development in the North East corner of the parcel. This should consist of mixed commercial and housing for no more than 1000 people taking up no more than 40 acres, with the remaining 82 to be added to the Hidden Falls park. If however my request and the requests of my neighbors are ignored then we'd need the city to "connect the triangle" if you will and build a light rail line that connects the airport and down town St. Paul. This would help pull cars off of the already congested roads and make the existing light rail infrastructure much more useful. As things stand now it takes an hour and a half to go from MSP to downtown Saint Paul via light rail making the system useless.

Please consider my input on this issue, we do not want our quiet little corner of the work to turn into Manhattan without a viable mass transit system.

Thanks.

-Sky

Comment
Number:
13

Comment Number: 14

Online Comment

COMMENT NUMBER: 14

DATE/TIME: 6/11/2019 10:47:00 AM

NAME: Nathan Bortz

COMMENT:

The site should include light rail or streetcar mass transit. Also, single family home development should not be limited to along the river. Mixed-use multi-family is fine, but the entire site should not be devoted to that use. Perhaps some a commercial office building or two could be considered. Also, a city-administered park must be included.

Online Comment

COMMENT NUMBER: 15

DATE/TIME: 6/11/2019 10:25:00 AM

NAME: Katie Traxler

COMMENT:

I love just across the Ford bridge in mpls. I go to highland 4-5 times per week. 3,800 residents is too many for that area. It will become too congested. The bridge will need reinforcing as well to maintain infrastructure. I believe people will start avoiding the area because of the level of congestion that will come of 3,800 additional residents.

Comment Number: 15

Online Comment

COMMENT NUMBER: 16

DATE/TIME: 6/11/2019 9:30:00 AM

NAME: Kent Petterson

COMMENT:

Thank you for the opportunity to comment on the plan for the Alternative Urban Areawide Review.

The redevelopment of the Ford site has been quite a ride of proposals and thoughtful comment. I would like to add mine and have simplified them into a few basic points.

1 – Both of the highlighted plans are too dense for this neighborhood near the river.

2 – All aspects of the plan must respect the river and its watershed. The development rules that apply for National Park land in the river valley and nearby must be complied with as development progresses.

3 – The site is currently served by BRT-A line. Any further improvements to transit must be of the affordable bus variety.

4 – The CP spur, although not a part of the development currently, should be a biking and walking trail with a connection to the future to be named Victoria Park site. Mass transit on this trail would be unsafe at many grade crossing streets.

5 – Structured parking as featured in the Ryan plan must be included to mitigate spill over parking onto near neighborhood streets.

Thank you,

Online Comment

COMMENT NUMBER: 17

DATE/TIME: 6/10/2019 5:51:00 PM

NAME: Michael Allan Brewer

COMMENT:

How about make it a really nice park?

Comment
Number:
17

Online Comment

COMMENT NUMBER: 18

DATE/TIME: 6/10/2019 5:08:00 PM

NAME: Joe Wallick

COMMENT:

Based off the situation of St Thomas getting kicked out of the MIAC. I think, the old Ford Site should be sold to the University of St Thomas, for St Thomas to expand their athletic facilities in an effort to go to Division 1 in the next decade. This could bring a lot of excitement around St Paul and Minnesota as the U of M would get some competition in their athletic sports.

Comment
Number:
18

Online Comment**COMMENT NUMBER:** 19**DATE/TIME:** 6/10/2019 3:32:00 PM**NAME:** Matthew Clark**COMMENT:**

What is it that makes Saint Paul "The most livable city in America?" Is it the appalling job done to plow the roads? Is it the number of potholes we get to dodge? Is it the way the potholes grow worse and worse in response to the freeze-thaw cycle that lousy plowing causes? Maybe it's the increasing number of tear-downs followed by oversized construction that steals the neighbors' air and light? Maybe it's the 6 story condo developments on Snelling Avenue that have taken the traffic problem up to 11? Maybe it's the artless way the city created a for-profit garbage collection consortium that forced people who had been able to conscientiously minimize their trash production to pay way more than they should? Maybe it's the proliferation of chain stores and franchises?

What makes Saint Paul a wonderful city in spite of the continued poor decision making of our city leaders is the established neighborhoods that allow mixes of people to live in close proximity to one another and the businesses and services they have helped develop. JS Coffee on Randolph makes Saint Paul a good city. Snuffy's on Cleveland helped make Saint Paul a good city; maybe they'll find a new home. Our libraries make this a good city. Sears helped make this a good city. Mattocks Park, Cherokee Park, Como Park, Highland Park make Saint Paul a good city. Amazon Foods does not make Saint Paul a good city. Mississippi Market makes Saint Paul a good city. Carbone's Pizza make Saint Paul a good city. Brake Bread and PJ Murphy help make Saint Paul a delicious city. Dunkin Donuts will not.

Planned developments on the scale of the Ford Plant are bound to create more of what is happening on the NE corner of Snelling and Selby. In what way does that development serve the needs of Saint Paul? Are we really trying to become a city of ticky-tacky condos and suburban style houses that only the rich can afford? Why? Why would that be desirable? In what way do the new developments on Snelling speak to the history or character of Saint Paul? They look like Anywhere, USA, which is to say they look like Nowhere, USA.

The Ford Plant site should be placed on hold and left as is for the next 10 years. Perhaps time and experience will provide our community leaders with the wisdom to make better choices than have heretofore been apparent.

Comment Number: 19A

Online Comment

COMMENT NUMBER: 19

DATE/TIME: 6/10/2019 3:01:00 PM

NAME: Matthew Clark

COMMENT:

I cannot begin to tell you how disappointed I am in the plans for the Ford site. More of what we already have? More places to buy things? More condos?

The plant was a productive part of our city. People who worked there made things that people needed. They trained to be productive people. That gets crushed and in its place will be 100+ acres of consumerism. Pathetic. Every animal consumes; humans create. So the developers "create" a new temple of consumption and the rest of us are supposed to consume.

When will the city ever get another parcel like this one? Why not be original? Why not think of something we actually need in this city? Why not contact Elon Musk and work to build a new plant? This land is located in one of the most educated neighborhoods in our state, with productive people ready and able to work to achieve something bold. But if the current plans go through we will have nothing more than an expansion of dreck. How sad.

I will write again to point out the devastating impacts that the planned development would have on the surrounding neighborhoods.

Comment
Number:
19B

Online Comment**COMMENT NUMBER:** 20**DATE/TIME:** 6/10/2019 10:57:00 AM**NAME:** mark kirchner**COMMENT:**

as i stated in a letter to the editor in the saint paul paper, i feel that the ford site is far too small an area for the amount of people you want to put there. the infrastructure simply cannot handle the traffic. i use the highland village to shop 3-4 times per week. without the new population that will fill the ford site, the corner of cleveland and ford is filled with traffic. a very, very simple solution is to move the highland national golf course to the ford site and then develop the newly vacated golf course site. you have the infrastructure already in place and snelling, hamline, and montreal streets can handle the traffic that will surely expand with the added population.

Comment Number: 20

Online Comment

COMMENT NUMBER: 21

DATE/TIME: 6/18/2019 8:41:00 AM

NAME: Lynnette Kayser

COMMENT:

I love the idea of a market within walking distance of all homes. This area must be a walkable, sustainable and forward thinking development...

How about 50 or so tiny houses for singles or young couples? Maybe a community center for the people who live in tiny houses to get to know their neighbors. It needs to be somewhere people want to live in 10 plus years. Tiny houses leave a very small carbon footprint for the area. I think the next generation will demand smaller, more sustainable homes. We must do more for our planet with smaller homes and more green space.

What a wonderful opportunity to make the world better for the next generations.

Comment
Number:
21

Online Comment

COMMENT NUMBER: 22

DATE/TIME: 6/15/2019 8:25:00 AM

NAME: Lori Tracy

COMMENT:

My biggest concern with the development of the Ford site is the traffic (vehicles and people) impact to the Highland shopping center, which is already congested.

Comment
Number:
22

Online Comment

COMMENT NUMBER: 23

DATE/TIME: 6/14/2019 9:24:00 PM

NAME: Brandon Jutz

COMMENT:

Will any potential impacts to the Hidden Falls themselves be studied to determine how changing the groundwater flow to the falls could impact that area?

Can the intersections of Cleveland and Sheridan as well as Shepard/Mississippi Blvd/Hwy 5 also be reviewed? There is significant traffic flow through that neighborhood now already.

How the CP spur could be used to move vehicle/transit traffic, or become a part of the trail/park network is an important discussion that is directly impacted by the study area's results. I wish this project was more clear about the goals for the railroad property inside and outside of the boundary area.

There is some kind of error on page 6 towards the bottom.

The report talks about transportation infrastructure, but what about transit access? (Bus stops, bike share, parking capacity)?

Are 4f permits needed given the proximity to the National Scenic River?

Comment
Number:
23

Roberts, Rebecca

Comment Number: 24

From: Winston Kaehler <winkaehler@gmail.com>
Sent: Thursday, June 27, 2019 3:37 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR relative to Ford site

I support the position of Neighbors for a Livable St. Paul relative to an AUAR for the Ford site. While I also support the goals of increased affordable (whatever that term means) housing and density (whatever that means), I also feel the City planning relative to access to and from the Ford site has been quite inadequate. Residents of areas surrounding the site, and the value of those areas to the city as a whole, deserve more consideration than they have been given by City officials up to this point.

Winston Kaehler
1712 Palace Avenue
St. Paul, MN 55105

Roberts, Rebecca

Comment
Number:
25

From: Donald Kist <diskon@live.com>
Sent: Thursday, June 27, 2019 6:22 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR

Please consider more lower development scenarios, such as lower high-rise heights and more open space for greenery. Additional examination of certain environmental aspects of the AUAR should carefully be considered as well. The health and welfare of the Mississippi River and the surrounding community should be the first priority of this project. Sincerely, Donald Kist

Sent from [Mail](#) for Windows 10

From: Claire Mathews-Lingen <cmathews.lingen@gmail.com>
Sent: Thursday, June 27, 2019 5:57 PM
To: *CI-StPaul_FordSitePlanning
Subject: Comments from a Youth on the Ford Site

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Claire Mathews-Lingen, I live at 2126 Jefferson Ave in Saint Paul, and I am 19 years old. I have lived in Mac Groveland/Highland park my entire life and thus the way this neighborhood grows is deeply important to me.

I would like to request that additional consideration and study be given to the connection of the Ford Site to transit systems. This project however it is established will have a high impact on the traffic in the area which can have severe environmental impacts.

I would also like for the different impacts of the different types of housing to be studied. For instance affordable housing units have a much more favorable impact on the community than high-end lofts and this should be considered in planning.

I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project’s traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Claire Mathews-Lingen

From: Julia Stein Dittberner <jsdittberner22@gmail.com>
Sent: Thursday, June 27, 2019 1:28 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Julia Stein Dittberner, and I live at 1630 Beechwood Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
2. A moderately-high-density mixed-use scenario
1500 dwelling units
94,000 sq. ft. of GFA retail/service
125,000 sq ft. of GFA office/employment
31,000 sq. ft. Of GFA civic/institutional
(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).
3. The Ford Master Plan Minimum scenario as outlined in City documents
2400 dwelling units
150,000 sq. ft. of GFA retail/service
200,000 sq. ft. of GFA office/employment
50,000 sq. ft. Of GFA civic/institutional

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat.
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

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further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration,

Julia Stein Dittberner

From: Anne Horst <ahorst@alumni.nd.edu>
Sent: Thursday, June 27, 2019 2:30 PM
To: *CI-StPaul_FordSitePlanning

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Anne Keenan, and I live at 1972 Norfolk Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
2. A moderately-high-density mixed-use scenario
1500 dwelling units
94,000 sq. ft. of GFA retail/service
125,000 sq ft. of GFA office/employment
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(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
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- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Sincerely,

Anne Keenan

From: Deb D <debraleedornfeld@gmail.com>
Sent: Thursday, June 27, 2019 12:58 PM
To: *CI-StPaul_FordSitePlanning; ivablesaintpaul@gmail.com
Subject: Public comment on AUAR

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Deb Dornfeld; I live across the River from the Ford site, and visit Highland Park quite often, usually on my bike. I am close enough to Ford Parkway and Minnehaha Falls that any major changes to the Ford site will definitely have a spillover effect on my neighborhood.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city. **(This is my favorite option, as both cities need more Green Space).**

2. A moderately-high-density mixed-use scenario
1500 dwelling units
94,000 sq. ft. of GFA retail/service
125,000 sq ft. of GFA office/employment
31,000 sq. ft. Of GFA civic/institutional
(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).

3. The Ford Master Plan Minimum scenario as outlined in City documents

2400 dwelling units

150,000 sq. ft. of GFA retail/service

200,000 sq. ft. of GFA office/employment

50,000 sq. ft. Of GFA civic/institutional

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with

respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.

- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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Thank you for your consideration.

From: Jean Hoppe <jeanhoppehome@gmail.com>
Sent: Wednesday, June 26, 2019 6:36 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR request

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jean Hoppe, and I live at 531 Mount Curve Blvd in Saint Paul.

I live very close to the Ford site. Under the current city's zoning plan, my home is slated to lose significant financial and personal value as Mount Curve is slated to become a main artery to and from the development at this site.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat.
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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for the AUAR. Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Also, the proposed development provides very little in terms of sustainable, livable-wage jobs that could be provided through light manufacturing. This is a stated goal of the Saint Paul Comprehensive Plan that is being overlooked. Consideration should be given to this development scenario.

Thank you for your consideration.

Sent from my iPhone please forgive typos and auto spell corrects

From: Marijo Wunderlich <wunde001@umn.edu>
Sent: Thursday, June 27, 2019 10:22 AM
To: *CI-StPaul_FordSitePlanning

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is __Marjo Wunderlich_____, and I live at __1512 Fairmount Ave. 55105_____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
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Thank you for your consideration.

Dr. Marijo Wunderlich

From: Angela Junker <angelajunker@gmail.com>
Sent: Thursday, June 27, 2019 10:27 AM
To: *CI-StPaul_FordSitePlanning
Subject: Ford plan

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Angela Junker, and I live at 2123 Juno Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
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Thank you for your consideration.

From: Kristin <heinmets_kristin@hotmail.com>
Sent: Thursday, June 27, 2019 10:31 AM
To: *CI-StPaul_FordSitePlanning
Cc: livablesaintpaul@gmail.com
Subject: Ford site comments - AUAR study

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Kristin Sullivan and I live at 1852 Pinehurst Ave in Saint Paul. As a mother of two young children, I am very concerned about the environmental and community impacts of development at the Ford site. Nature is very important to my family and the lack of green space and ballparks are especially concerning for my son who plays Little League. We already have to drive to Como Park because there are no soccer fields in Highland Park for the Blackhawks. We will wait and see, but I'm not sure this will be a community my family and I want to stay in should high density housing and traffic and hardly any green space or trees be a part of it. In 20 years will my children look back at where they used to live with horror?

I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal.

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
2. A moderately-high-density mixed-use scenario
 - 1500 dwelling units
 - 94,000 sq. ft. of GFA retail/service
 - 125,000 sq ft. of GFA office/employment
 - 31,000 sq. ft. Of GFA civic/institutional(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).

3. The Ford Master Plan Minimum scenario as outlined in City documents

2400 dwelling units

150,000 sq. ft. of GFA retail/service

200,000 sq. ft. of GFA office/employment

50,000 sq. ft. Of GFA civic/institutional

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Best,

Kristin Sullivan

Roberts, Rebecca

Comment Number: 34

From: M K <irishcillin@gmail.com>
Sent: Thursday, June 27, 2019 10:32 AM
To: *CI-StPaul_FordSitePlanning
Subject: Concerns

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Margaret Killeen_, and I live at 2076 Niles Avenue_ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
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94,000 sq. ft. of GFA retail/service
125,000 sq. ft. of GFA office/employment
31,000 sq. ft. Of GFA civic/institutional
(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).
3. The Ford Master Plan Minimum scenario as outlined in City documents
2400 dwelling units
150,000 sq. ft. of GFA retail/service
200,000 sq. ft. of GFA office/employment
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
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- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat.
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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

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Transportation (Section 18) —Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

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Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities,

schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

_Maragret Killeen

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Margaret Fuller Corneille and I live at 1652 Hartford Ave Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. A moderately-high-density mixed-use scenario

1500 dwelling units

94,000 sq. ft. of GFA retail/service

125,000 sq ft. of GFA office/employment

31,000 sq. ft. Of GFA civic/institutional

(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).

2. The Ford Master Plan Minimum scenario as outlined in City documents

2400 dwelling units

150,000 sq. ft. of GFA retail/service

200,000 sq. ft. of GFA office/employment

50,000 sq. ft. Of GFA civic/institutional

For the following reasons, the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road

improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.

- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- These scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- These scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational

facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Margaret Fuller Corneille

1652 Hartford Ave

St Paul MN 55116

From: McQuillan, Jim (MMA) <Jim.McQuillan@MarshMMA.com>
Sent: Thursday, June 27, 2019 11:55 AM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site AUAR

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jim McQuillan, and I live at 519 Mount Curve in Saint Paul. I have followed the work of the Neighbors for a Livable Saint Paul and have found much of their work informative, though not all. I recently read through some of their material and find it difficult not to support their conclusions to analyze additional development scenarios.

I respectfully request your open minded review of the following considerations:

I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build or reduced incremental build scenario The incremental development model stresses the use of existing infrastructure in the city.
2. A moderately-high-density mixed-use scenario
1500 dwelling units
94,000 sq. ft. of GFA retail/service
125,000 sq ft. of GFA office/employment
31,000 sq. ft. Of GFA civic/institutional
3. The Ford Master Plan Minimum scenario as outlined in City documents
2400 dwelling units
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.

- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
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Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

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project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Jim McQuillan

This e-mail transmission and any attachments that accompany it may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law and is intended solely for the use of the individual(s) to whom it was intended to be addressed. If you have received this e-mail by mistake, or you are not the intended recipient, any disclosure, dissemination, distribution, copying or other use or retention of this communication or its substance is prohibited. If you have received this communication in error, please immediately reply to the author via e-mail that you received this message by mistake and also permanently delete the original and all copies of this e-mail and any attachments from your computer.

Please note that coverage cannot be bound or altered by sending an email. You must speak with or receive written confirmation from a licensed representative of our firm to put coverage in force or make changes to your existing program. Thank you.

Roberts, Rebecca

Comment Number: 37

From: Mark Seuntjens <mark.seuntjens@gmail.com>
Sent: Thursday, June 27, 2019 12:13 PM
To: *CI-StPaul_FordSitePlanning
Subject: ford plan requirements
Attachments: ford plan_001.pdf

Please see attached.

Regards,
Mark Seuntjens
2211 Sargent Ave, St Paul, MN 55105

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Mark Seuntjens and I live at 2211 Sargent Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.

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Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project’s traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Mark Smith
June 27, 2019

From: Barbara Mingo <bmingokitchens@gmail.com>
Sent: Friday, June 28, 2019 2:09 PM
To: *CI-StPaul_FordSitePlanning
Cc: Neighbors for a Livable Saint Paul
Subject: Public Comment on Ford Site

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is _Barbara Mingo_, and I live at ____2163 Bayard Avenue__ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.
2. A moderately-high-density mixed-use scenario
1500 dwelling units
94,000 sq. ft. of GFA retail/service
125,000 sq ft. of GFA office/employment
31,000 sq. ft. Of GFA civic/institutional
(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).

3. The Ford Master Plan Minimum scenario as outlined in City documents

2400 dwelling units

150,000 sq. ft. of GFA retail/service

200,000 sq. ft. of GFA office/employment

50,000 sq. ft. Of GFA civic/institutional

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that

the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

The traffic on Cretin Ave from 94 to Randolph ave (southbound) between 4-6:30 pm is nearly unbearable most days now... this volume should not be averaged over a

24 hr period in order to produce more palatable traffic flow numbers for the purpose of your desire for increased density...

Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Barbara Mingo

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Barbara Mingo Kitchen and Bath Design

2163 Bayard Avenue

St. Paul, MN 55116

612-414-6092

Website - bmingodesigns.com

From: Ann Stark <annabelle545@hotmail.com>
Sent: Sunday, July 7, 2019 4:54 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Development

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Ann Stark_, and I live at 545 Mount Curve Blvd in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their

health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Ann Stark

From: Sam Tsai <samtsai3240@gmail.com>
Sent: Friday, July 5, 2019 4:46 PM
To: *CI-StPaul_FordSitePlanning
Subject: VERY concerned about the environmental and community impacts of development at the Ford site

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is YU-MAO TSAI and I live at 2215 Scheffer Ave, in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Janice Martland <mrfy1219@comcast.net>
Sent: Friday, July 5, 2019 9:22 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jan Martland, and I live at 1219 Bayard Avenue in Saint Paul, Minnesota.

I am writing as I am concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

I would love to see much lower density options be evaluated including a no-build scenerio, moderately-high-density mixed scenario (1,500 dwelling units) and the Ford Master Plan Minimum scenario (2,400 dwelling units) at the Ford plant site. Any or all of these scenarios would be environmentally superior as they would result in a decrease in the traffic congestion, (in an already congested area), and all the negatives that come with that including: safety issues; air pollution; increased infrastructure costs and road maintenance; and the environmental impact on the Mississippi River Corridor Critical Area. I also believe any of these lower density options would be a better fit with the existing neighborhood.

I am also requesting that additional consideration and study be applied to the following AUAR topic areas.

- 1) Contamination/Hazardous Materials/Wastes and the potential environmental impacts of Area C;
- 2) Air quality. Studying the effects of increased vehicle emissions and it's health impacts by comparing current and future development scenarios
- 3) Transportation. Taking into consideration the increase in personal use vehicles and truck traffic and performing a traffic study to determine what the impact of that will be on the immediate area and the arterial streets, highways, and freeways.
- 4) Infrastructure and services, and the impact that all the proposed scenarios will have on traffic, storm and sanitary water treatment and access to social infrastructure (schools, libraries, police, firefighting services).

Thank you for your consideration,

Sincerely,

Jan Martland

From: John Wittenstrom <drwitt@mac.com>
Sent: Friday, July 5, 2019 9:05 AM
To: *CI-StPaul_FordSitePlanning
Cc: Neighbors for a Livable Saint Paul
Subject: Feedback!

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

Our names are John Wittenstrom and Kathleen Hetrick and we have lived in Highland Park at 910 Howell Street South in Saint Paul since 1998... Over 20 years.

We are very concerned about the environmental and community impacts of development at the Ford site. We request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. We request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and

post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

John Wittenstrom and Kathleen Hetrick
July 5, 2019

From: David Fox <davefox1235@yahoo.com>
Sent: Friday, July 5, 2019 12:26 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR comment

To whom it may concern:

My name is David Fox, I live at 659 Montcalm place, Saint Paul, Mn 55116.

Please note:

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health

impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to [35E, Mount Curve Boulevard, Mississippi River Boulevard](#), and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

[Sent from Yahoo Mail for iPhone](#)

From: Katie Shaw <KShaw@mspcommunications.com>
Sent: Thursday, July 4, 2019 12:09 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Study

Importance: High

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue. These routes are already heavily congested, as is Snelling Avenue, there aren't alternate routes to avoid traffic.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Katie Shaw

From: andrewtraxler12@gmail.com
Sent: Wednesday, July 3, 2019 2:39 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR for the Ford site and adjacent parcels comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Andrew Traxler and I live at [1780 Scheffer Ave in Saint Paul](#).

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to [35E, Mount Curve Boulevard, Mississippi River Boulevard](#), and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration,

Andrew Traxler

Sent from my iPhone

Roberts, Rebecca

Comment Number: 46

From: Anne D Brataas <annebrataas@mac.com>
Sent: Wednesday, July 3, 2019 1:58 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford site comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Anne Brataas. I live at 507 Montrose Lane 55116, and work (420 Summit Ave., 55102) in St. Paul, and have since 1981. The reason: St. Paul's genuine sense of neighborly community, and pride of place, embodied by its many beautiful single family residential homes throughout the city.

At the Ford site, please find a way to help others experience pride of place; sense of ownership and investment in their own futures through home ownership.

This current Ford site plan does not support those values, in fact, it supports no values or character. It's all about money. That is not how healthy neighborhoods are made.

In particular:

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
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- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
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study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

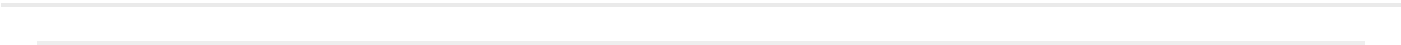
- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
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Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.



From: A C Castelán <accastelan@gmail.com>
Sent: Wednesday, July 3, 2019 1:27 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site consideration

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Anselmo C. Castelán, and I live at 1681 Saunders Avenue, 55116 in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of

particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Susan Crosby <susan.libbey.crosby@gmail.com>
Sent: Wednesday, July 3, 2019 11:08 AM
To: *CI-StPaul_FordSitePlanning
Cc: livablesaintpaul@gmail.com
Subject: Regarding the AUAR for the development of the Ford Plant

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Susan Crosby, and I live at 575 Montrose Lane, Saint Paul, MN 55116.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.

- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.
- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Sincerely,

Susan Crosby



--

Susan Libbey Crosby, MEd., LPC
Executive VP, PainCare, LLC, Navio Health

From: Elvira Anzueto <eanzueto@yahoo.com>
Sent: Wednesday, July 3, 2019 10:34 AM
To: *CI-StPaul_FordSitePlanning
Subject: For Site Planning

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Elvira Anzueto-Ramirez, and I live at 1659 Bayard Ave. in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
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Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Elvira Anzueto-Ramirez

1659 Bayard Ave.

Saint Paul, MN 55116

From: Jennie McQuillan <jennmcq2002@gmail.com>
Sent: Wednesday, July 3, 2019 10:49 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR impacts to be considered

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is _Janine Mcquillan_____, and I live at
_____519 Mount Curve Blvd._____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.

- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
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- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
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supplying and maintaining infrastructure and services.

Thank you for your consideration.

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* You are receiving this email as you signed a petition for lower density on the site, donated resources, volunteered or requested a lawn sign.

Our mailing address is:

P.O. Box 16058, Saint Paul, Minnesota 55116

Prepared and paid for by the Neighbors for a Livable Saint Paul Committee

Want to change how you receive these emails?

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Neighbors for a Livable St. Paul · Highland Park · Saint Paul, MN 55116 · USA



From: Jacob Olson <jakeo9@msn.com>
Sent: Wednesday, July 3, 2019 10:07 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jacob Olson, and I live at 2114 James Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
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- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
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- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
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emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.

- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Colleen Traxler <colleentraxler@gmail.com>
Sent: Wednesday, July 3, 2019 10:07 AM
To: *CI-StPaul_FordSitePlanning
Cc: Neighbors for a Livable Saint Paul
Subject: AUAR for the Ford site and adjacent parcels comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Colleen Traxler and I live at 1780 Scheffer Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.
- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due

to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration,

Colleen Traxler

From: Bobbette Axelrod <sisterfun@comcast.net>
Sent: Wednesday, July 3, 2019 9:59 AM
To: *CI-StPaul_FordSitePlanning
Cc: livablesaintpaul@gmail.com
Subject: Ford site planning

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Bobbette Axelrod, and I live at 2080 Hartford Ave, St. Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.
- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and

post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: A Platt <asplatt@gmail.com>
Sent: Wednesday, July 3, 2019 9:55 AM
To: *CI-StPaul_FordSitePlanning
Cc: Neighbors for a Livable Saint Paul
Subject: AUAR

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is A Platt, and I live at 1811 Montreal Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario: (few dwelling units at the Ford site; housing dispersed to other city locations)
2. A moderately-high-density mixed-use scenario: (1,500 dwelling units)
3. The Ford Master Plan Minimum scenario as outlined in City documents: (2,400 dwelling units)

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of all vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling trucks and cars in traffic congestion is of significant concern and should be included in this evaluation.
- **Noise** (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and

post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

Also, as has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

+ + + + + + + + + +

A Platt

asplatt@gmail.com

515.290.8117

+ + + + + + + + + +

From: Hoppe, Bruce <Bruce.Hoppe@nVent.com>
Sent: Tuesday, June 25, 2019 8:21 PM
To: *CI-StPaul_FordSitePlanning
Subject: Public comments for the Draft AUAR Order and Scoping EAW suggesting additional development scenarios and other issues to be analyzed

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Bruce Hoppe, and I live in a single-family home at 531 Mount Curve Blvd in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

I truly believe if that the level of density proposed by the Ryan development (slightly lowered from the City's original plan) is still grossly incompatible with the existing land use in Highland, and it is incompatible with level of residential-type feeder roads into this site. For this reason I request other types of land use scenarios be considered as part of the AUAR study, along with expanding the study of impact to a wider area beyond the immediate area adjacent to the site.

I believe in the current AUAR scope, only two population scenarios are planned, accounting for 3800 and 4000 housing units. This scenario range is not sufficiently different from each other. I'm advocating the addition of a few more development scenarios into the AUAR scope (consider lower unit build-out numbers such as 2400 units) to provide a broader comparison of impacts with those of the current proposal.

The AUAR scope needs to expand traffic/pollution impact along major current or planned arteries including: Cretin to 94, Cleveland to 94, Fairview in both directions to the freeways, Montreal to freeway, Randolph to 35E, Mount Curve and River Road, ford parkway to across bridge to Mpls. These are the corridors that will become gridlocked with the planned 40% increase in Highland's population.

Finally, I think the current AUAR scope disregards or tries to minimize several other key issues – such as:

- Unaddressed environmental impacts due to the Contamination/Hazardous Materials/Wastes (Section 12) related to "Area C" near the river -- also limited scope for Air (Section 16) and Noise pollution (Section 17) impacts
- The Transportation section (Section 18) appears to be taking into account only the best-case traffic volume scenarios / assumptions - traffic during non-peak times, during summer months
- Impact on infrastructure and community services appears to be understated

It appears to me that the scope is being limited to achieve the desired results, with confirmation bias. I know that the tax paying residents (and voters) are closely watching how City leadership is managing and controlling this process as a means to an end.

Sincerely – Bruce Hoppe, Highland Park

Online Comment**COMMENT NUMBER:** 57**DATE/TIME:** 6/26/2019 2:34:00 PM**NAME:** Andrew Singer**COMMENT:**

I think the proposed development boundary, scenarios and scoping document needs to include the south side of Ford Parkway. With the huge increase in residential population, plans need to be developed to make this stretch of Ford Parkway more bike (and Pedestrian) friendly. Critical for doing this is eliminating parking on the south side of the street at least as far as Finn Street and installing an up-hill, east-bound bike lane from the Ford Parkway Bridge to Finn Street or (ideally) Cleveland Avenue. Bikes heading eastbound from the Ford Parkway bridge are going up hill and are therefore moving much slower than car traffic. This creates dangerous situations for bicyclists. Ford Parkway and the Ford Parkway bridge are the only way to get to Minneapolis and the 46th Street LRT station. Efforts must be made to make Ford Parkway more bike friendly and connect it with bikeways on Cleveland Avenue the bike lanes further east on Ford Parkway (starting at Kenneth). Eliminating parking on the south side of Ford Parkway, installing a bike lane (at the very least on the south side and, ideally on both sides) should be part of the development boundary and scoping discussions.

Online Comment**COMMENT NUMBER:** 58**DATE/TIME:** 6/27/2019 11:36:00 AM**NAME:** Jay Severance**COMMENT:**

My comments relate primarily to the vision for public transit within the site boundaries and use of the 13 acre Canadian Pacific parcel plus use of the associated CP spur outside of the site boundaries.

This project represents an outstanding opportunity to construct a model community which incorporates both a regional and an intra-boundary transit focus. The AUAR speaks to traffic issues within the boundaries, but seems to be mute on the needs and means of transport among the site and surrounding regional centers; including the airport and downtown activity and transportation hubs. Further, the intra-site transportation vision must consider the use of future modes of transportation...automated shuttle vehicles to provide mobility throughout the site and access regional transit...limited access streets with bicycle and pedestrian lanes...minimized dependence on private vehicles.

The Riverview Corridor project provides an opportunity to link the site to regional hubs. Unfortunately the current LPA does not address this opportunity. An alternative to utilize the CP Spur for a dedicated transit right of way...plus bicycle and pedestrian access... serving the site has been proposed and should be incorporated as part of this AUAR. Means should be taken to include this alternative in the Riverview Corridor LPA environmental study.

The AUAR also appears to be mute on the use of the 13 acre CP yards parcel. This could be developed as a business park, which would require less environmental remediation than a residential or parkland use. The site could incorporate a transit station and parking on the southern boundary of the site and be served by the Riverview Corridor LRT.

Preliminary steps should be taken now to enable this vision:

- Acquisition of the CP yards and CP spur by a government agency.
- Reserve a transit right of way within the site to provide access to a new river crossing at the southwest corner of the site.
- Demand that the Riverview Corridor Project consider the alternative of using the CP spur, and a new river crossing at the site to provide regional transit connectivity.

This project is a unique opportunity to set St Paul and the region apart as a forward looking community. Don't let it be missed!

Roberts, Rebecca

Comment Number: 58

From: Rosalyn Segal <rsegal@umn.edu>
Sent: Thursday, June 27, 2019 7:58 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford site AUAR public comment

Dear Ms Mohan and Members of the Department of Planning and Economic Development,

My name is Rosalyn Segal and I live at 2208 Hartford Avenue in St Paul. That is six blocks from the former Ford plant and the site of possible new development. I am very concerned that the previous transportation studies did not accurately reflect the current traffic issues in the area and the real impact that adding thousands of residents will have on traffic.

I'm very concerned that I will never be able to make a left turn out of my alley onto Cretin to head to work every morning as Cretin will be the major in-out roadway for the entire new development. There are some misguided assumptions that if high-density housing is built the people living there won't use their own cars but will rely on public transportation. Even if only half of the new residents use their own transportation the traffic problems will still be colossal during morning and evening rush hours.

Our children attended the local neighborhood grade school, Horace Mann, and were proud walking patrol captains. I can't see how the neighborhood walking patrols (grade school age children walking themselves to school in groups) will be able to safely manage crossing Cretin anywhere between Randolph and Highland Parkway (there are no traffic lights or stop signs) with a significant increase in traffic. The push for high-density housing will dramatically change the nature of the Highland Park neighborhood that we cherish and pay high property taxes to live in. Please look more closely at the traffic issues and reduce the density of the planned housing.

Thank you for your consideration.

Sincerely,

Rosalyn Segal

2208 Hartford Avenue

homeowner since 1999

Online Comment

COMMENT NUMBER: 60

DATE/TIME: 7/3/2019 8:43:00 PM

NAME: Thomas L Romens

COMMENT:

My name is Thomas Romens, and I live at 670 Mississippi River Blvd. S., two blocks north of the former Ford plant.

I am pleased by the efforts made by the Ryan Company in term of listening to neighbor concerns. I feel their plan is a reasonable compromise. My concerns with the AUAR analysis/plan as outlined are as follows:

1. If your analysis includes a comparison study with the Maximum Plan Development Scenario of 4000 dwelling units, why would you not also include a comparison with the Minimum Plan Development Scenario of 2,400 dwelling units? Making a comparison with only the Maximum Plan Scenario seem to indicate a bias towards high density, not an impartial consideration of multiple density levels.
2. Low impact (walking and biking) connectivity to the existing Highland business area is poorly described. Will there be dedicated bike and walking paths to the existing business district? Also, will there be dedicated walking and biking paths to facilitate access to the existing Mississippi River Boulevard bike and walking paths as well as to Hidden Falls Regional Park? Note that low impact connectivity to the river has traffic implications if such access is only available at stop lights and stop signs on Mississippi River Boulevard.
3. The AUAR traffic impact study is inadequate as proposed. Any reasonable study would include the impact of additional traffic toward major arterials (Cretin to I-94, Montreal to 35E, MRB south to Hwy 5, and Ford Parkway west to Hwy 55). The most critical of these is Cretin Avenue. Cretin is already problematic during morning and afternoon rush hours. Specific study of the impact of additional traffic south on Cretin in the afternoon rush hour must at a minimum include the two semaphores at Summit Avenue and the semaphore at Grand. Because Cretin narrows from two lanes to one lane at Lincoln, additional traffic will likely reroute on local streets and Mississippi River Boulevard. The semaphore and left turns at St. Clair represent another southbound choke point that will assuredly be worse with additional traffic. One simply cannot predict the impact on local streets and Mississippi River Boulevard without looking further to the north than the original traffic study proposal.

Comment
Number:
60

Online Comment

COMMENT NUMBER: 61

DATE/TIME: 6/29/2019 11:29:00 AM

NAME: Russ Yttri

COMMENT:

I'd like the density of the area. The thing that concerns me is single-family housing along River Road which I don't think is appropriate. It is time to think very hard about our density and our Reliance on single-use automobiles. Multi-family homes can still be expensive and fit in with the neighborhood.

From: Deborah KATZ <katzdebd@gmail.com>
Sent: Wednesday, July 10, 2019 11:35 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is ___Deborah Katz_____, and I live at ___740 Mississippi River
Blvd_____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please

include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.



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Roberts, Rebecca

Comment
Number:
61 B

From: Deborah KATZ <katzdebd@gmail.com>
Sent: Wednesday, July 3, 2019 11:36 AM
To: *CI-StPaul_FordSitePlanning
Subject: Density of Ryan company development of Ford plant area

Please consider the Neighbors for a Livable St. Paul amendments to the original Ryan Company social and environmental impact plan.

This development is right across the street from a national scenic byway on one of the most famous waterways in the United States.

Bald eagles fly by, species of cranes and hawks abound in the area. These birds feed on fish in the Mississippi.

It's imperative that considerations of tax profitability take a backseat to an urban environment that cannot be replaced if mistakes are made.

Deborah Katz



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Roberts, Rebecca

Comment
Number:
62

From: Mary Firestone <mbfirestone@gmail.com>
Sent: Wednesday, July 3, 2019 11:31 AM
To: *CI-StPaul_FordSitePlanning
Subject: Clear Out Area C!

My name is Mary Firestone and I live at 740 Mississippi River Boulevard, across from the Ford plant. We previously owned a home near the Ford plant on Cleveland Avenue for many years, and many people in that area got cancer or other diseases; one young mother, a neighbor, died from cancer, my husband died from cancer, our neighbor south of our home died from cancer, and I was diagnosed last year with renal cell carcinoma. My kidney was removed and blessedly the tumor was benign. Several of my neighbors on Cleveland struggled with serious health issues; I was in excellent health as was my husband before owning this home on Cleveland where we became ill after living there a few years. We were in our early forties at the time, and this was the 1990's.

I am very concerned that you are not doing enough to deal with Area C before you develop the Ford plant, and that little research has been done about the past and current impacts of the pollution from Ford on people in the Highland neighborhood. Area C could be yet impacting the ground water and potentially leaking into the area where the development is planned.

This lack of attention to the potential harm to human life will not bode well for the developers down the road if Area C isn't completely cleared away and addressed before your plans are put into action. It might be twenty years before it's ready.

Do what is right for people first.

Mary Firestone
651-587-6596

Roberts, Rebecca

Comment Number: 63

From: Lynn Varco <lvmaroon@yahoo.com>
Sent: Thursday, July 4, 2019 11:44 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Public Comment
Attachments: Lynn Varco AUAR Public Comment July 4, 2019.pdf

Hello,

Please find attached my letter for public comment on the matter of the AUAR for the Ford site.

Respectfully submitted,

Lynn Varco
1587 Beechwood Avenue
St. Paul, MN 55116

July 4, 2019

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Lynn Varco, and I live at 1587 Beechwood Avenue in Saint Paul. I write today with concerns about the Ford site AUAR study and offer three additional study ideas that support future development more compatible with the pattern and scale of the existing neighborhood.

If the AUAR is truly a fact-finding document and not a partisan tool of high-density devotees, please include these options which would offer greater balance, sober judgement and clarity of purpose for how this land shall be used by future generations.

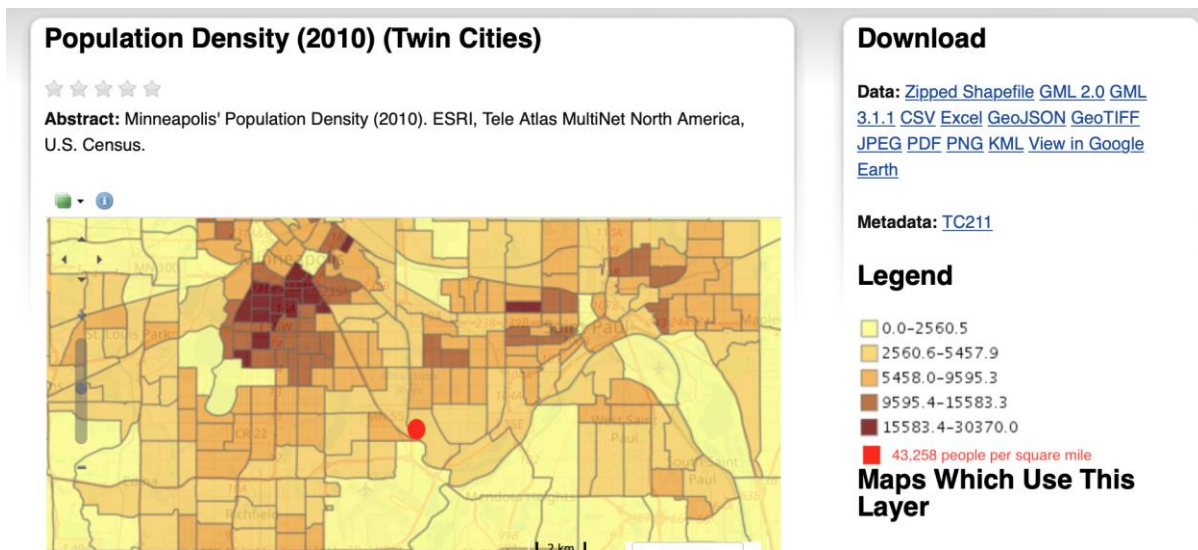
As the AUAR study criteria currently stands, it excludes reasonable study options and only favors outcomes that support the City's highest density option. The City approved lower density option (2,400 units) merits further study (along with the two other options below) but is excluded from the study and by default, disfavored by the City.

Unfortunately, the City appears intent on ensuring that it's preferred high density outcome prevails in the AUAR and that there is no study data available to dispute or question such an outcome. They achieve this sleight of hand by including only two high-density scenarios in the scoping document which are, not by accident, nearly identical. We can do better. Please remedy this manifest error by including the three study options below:

1. **No-Build Scenario:** This scenario would posit minimal construction and build out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site used instead for park, recreational space, and wildlife habitat. This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. This scenario would also act as a "control" which is standard procedure for large-scale development like this.
2. **Light Manufacturing Scenario:** Light manufacturing at the site would use existing infrastructure including the CP Rail Line. Existing transportation infrastructure could adequately handle this level of traffic as it would likely be similar to that of the former Ford Assembly Plant. Thus, it would be environmentally preferable to the City and Ryan Scenarios as it would generate far less traffic and traffic congestion, and less intrusive to the MRCCA and wildlife habitats regarding noise, light, traffic, and traffic emissions. Light manufacturing would likely provide livable wage jobs for residents of Highland and Saint Paul, who would not have to travel for work.
3. **Low to Moderate Density Scenario:** This scenario would allow for 2,400 dwelling units and proportionate levels of retail, employment and civic space. This scenario would generate far less traffic and traffic congestion than the City and Ryan Scenarios. This housing density is still well above what was originally considered by the City when evaluating alternatives in 2007, but it is a more reasonable level of density that with the pattern and scale of the existing neighborhood.

These three study options are environmentally preferable to the scenarios identified in the current AUAR documents for the following reasons:

- Greater compatibility with the pattern and scale of the existing surrounding neighborhood, which is primarily low to medium-density residential with accompanying limited commercial



development. The map illustrates the unreasonable and untenable density being proposed by the City and Ryan. The Ford property, indicated by the red dot, would become an island of supremely high density, far removed from existing major transit infrastructure and exceeding the density levels of the highest density in the Twin City area.

- The Ford property has only remote freeway access with limited arterial streets designed to handle the level of traffic that will be generated by the higher density City and Ryan scenarios.
- Smaller and fewer buildings with more green space and fewer trips into and out of the development. Existing street grids, adjacent arterial streets, and existing transit systems would more easily accommodate this increase of traffic.
- Reduction in the negative impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will preserve river bluff vistas and protect more than 325 bird species that migrate along the Mississippi Flyway.
- Lower negative impact on the Mississippi River gorge wildlife habitat – home to a large variety of large and small mammal species. Lower-density scenarios would present less disturbance to bald eagle nesting habitat still protected by the Bald and Golden Eagle Protection Act.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not

included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

- **Air** (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- **Noise** (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment. The AUAR study should also include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc.

Thank you for your time and consideration.

Respectfully submitted,
Lynn Varco
1587 Beechwood Avenue
St. Paul, MN 55116

Roberts, Rebecca

Comment Number: 64

From: Kathryn McGuire <mcguire.kathy56@gmail.com>
Sent: Tuesday, July 9, 2019 9:28 AM
To: *CI-StPaul_FordSitePlanning
Subject: Re: AUAR

Please acknowledge that my letter has been received.

Thank you!

> On Jul 3, 2019, at 9:45 AM, Kathryn McGuire <mcguire.kathy56@gmail.com> wrote:
>
> Dear Ms Mohan,
>
> I would greatly appreciate acknowledgement that my email has been
> received and that the attached letter has been opened and read. I have
> included a graph and other details that I do not want to be overlooked.
>
> Thank you,
>
> Kathryn McGuire
>
>
> <AUAR-July 1, 2019.docx>

July 1, 2019

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Kathryn McGuire, and I live at 2203 Fairmount Avenue in Saint Paul. I wish to express my concerns and suggestions pertaining to the AUAR study of the Ford property. I am suggesting the following alternative development scenarios which I feel are environmentally superior to the City and Ryan scenarios, and I request that these be included for comparison.

1. **No-Build Scenario:** This scenario would imply minimal construction and build out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site used instead for park, recreational space, and wildlife habitat. This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city which is environmentally and economically more desirable. This scenario would also add much needed recreation space and green space to the Highland area which is currently underrepresented in relation to other areas of Saint Paul. Having adequate recreational space in the neighborhood means reduced travel to other locations.
2. **Light Manufacturing Scenario:** Light manufacturing at the site would use existing infrastructure including the CP Rail Line. Existing transportation infrastructure would adequately handle this level of traffic as it would likely be similar to that of the former Ford Assembly Plant. This scenario would be environmentally superior to the City and Ryan Scenarios as it would generate far less traffic and traffic congestion, and it would be far less intrusive to the MRCCA and wildlife habitats in terms of noise, light, traffic, and traffic emissions. Light manufacturing on the site would likely provide livable wage jobs for residents of Highland and Saint Paul, who would not have to travel to the suburbs for sustainable employment.
3. **Low to Moderate Density Scenario:** This scenario would allow for 1500 dwelling units and proportionate levels of retail, employment and civic space. This scenario would generate far less traffic and traffic congestion than the City and Ryan Scenarios. This housing density is still well above what was originally considered by the City when evaluating alternatives in 2007, but it is a more reasonable level of density that would be more compatible with existing land use.

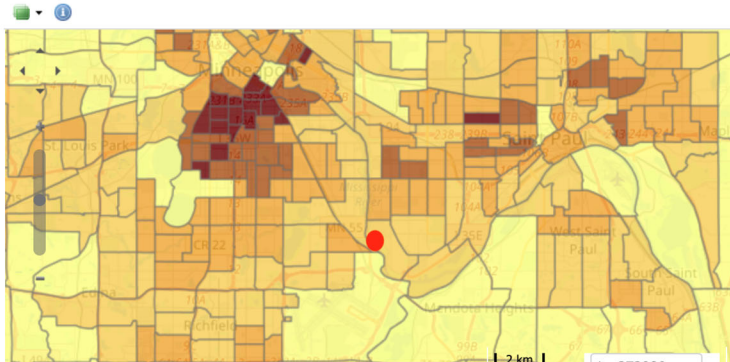
For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios identified in the AUAR documents.

- The above scenarios are far more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development. It is noteworthy that the Ford property has only remote freeway access and limited arterial streets designed to handle the level of traffic that will be generated by the City and Ryan scenarios. The map below clearly illustrates the absurdity of the City and Ryan scenarios with regard to existing land use patterns. The Ford property, indicated by the red dot, would become an island of density, far removed from existing major transit infrastructure and exceeding the density levels of the highest density in the Twin City area.

Population Density (2010) (Twin Cities)



Abstract: Minneapolis' Population Density (2010). ESRI, Tele Atlas MultiNet North America, U.S. Census.

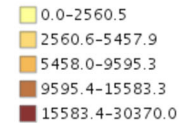


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Data: [Zipped Shapefile](#) [GML 2.0](#) [GML 3.1.1](#) [CSV](#) [Excel](#) [GeoJSON](#) [GeoTIFF](#) [JPEG](#) [PDF](#) [PNG](#) [KML](#) [View in Google Earth](#)

Metadata: [TC211](#)

Legend



43,258 people per square mile
Maps Which Use This Layer

- The above scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- The above scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in the need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- All of the above scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of the above scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat. The bald eagle continues to be protected by the **Bald and Golden Eagle Protection Act**.
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- **Contamination/Hazardous Materials/Wastes** (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- **Air** (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project’s traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- **Noise** (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.
- **Transportation** (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- **Impact on infrastructure and services** — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational

facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your time and consideration in creating a thorough and genuine AUAR study.

Sincerely,

Kathryn McGuire
2203 Fairmount Avenue

From: Molly Barrett <mollybarrett@comcast.net>
Sent: Monday, July 8, 2019 5:40 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Molly Barrett, and I live at 1944 Goodrich Ave, In Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Molly Barrett
(651)245-3288

From: imaginecm2 <imaginecm2@yahoo.com>
Sent: Monday, July 8, 2019 5:04 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is ___Camille McCa. _____, and I live at ___2724 Hartford Ave _____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please

include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Sent from my Verizon, Samsung Galaxy smartphone

From: Philip Cochran <philipjcochran@hotmail.com>
Sent: Monday, July 8, 2019 3:52 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development, Our names are Philip Cochran and Mary Nichols_, and we live at 2204 Bayard_ in Saint Paul.

We are very concerned about the environmental and community impacts of development at the Ford site. We request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. We request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Sent from my iPad

From: Jutta Crwder <juuts.c@gmail.com>
Sent: Monday, July 8, 2019 3:22 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jutta Crowder, and I live at 564 Mt. Curve Blvd in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Nolan Zavoral <nzavoral@toast.net>
Sent: Monday, July 8, 2019 3:20 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is __Nolan Zavoral_____, and I live at __861 Wilder St. S._____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Kevin Mencke <MENCKEK@msn.com>
Sent: Monday, July 8, 2019 2:49 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Kevin Mencke, and I live at 2135 Pinehurst Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: E H <ejhansen75@yahoo.com>
Sent: Monday, July 8, 2019 2:23 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Eric Hansen, and I live at 2190 Scheffer Ave. in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Eric

From: HOWARD MILLER <howardjmiller@msn.com>
Sent: Monday, July 8, 2019 2:09 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Howard Miller, and I live at 2081 Highland Pkwy in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that possible multiple development scenarios be considered in the AUAR's Scope to provide a better comparison of impacts with those of the current City Plan and Ryan amendments:

1. A moderately-high-density mixed-use scenario
2. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would reduce the exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. Any assumptions which include disproportionate increases in alternative transportation (bicycles, scooters, transit) must be based on established systems data from similar sites, e.g. comparable urban sites in the US with comparable infrastructure.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Howard J. Miller
612-250-1734

From: Maggie LaNasa <maggie.lanasa@gmail.com>
Sent: Monday, July 8, 2019 1:27 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Maggie LaNasa, and I live at 1752 Bohland Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Maggie LaNasa
1752 Bohland ave
Saint Paul, MN 55116

From: Burda, Kate A <kate.burda@usbank.com>
Sent: Monday, July 8, 2019 12:58 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

Hi – We are Andrew and Kate Burda, and we live at 2196 Berkeley Ave in Saint Paul. We are very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure.

Thank you for the consideration.

Andy and Kate Burda

U.S. BANCORP made the following annotations

Electronic Privacy Notice. This e-mail, and any attachments, contains information that is, or may be, covered by electronic communications privacy laws, and is also confidential and proprietary in nature. If you are not the intended recipient, please be advised that you are legally prohibited from retaining, using, copying, distributing, or otherwise disclosing this information in any manner. Instead, please reply to the sender that you have received this communication in error, and then immediately delete it. Thank you in advance for your

cooperation.

From: Janet Munson <jlmunson44@gmail.com>
Sent: Monday, July 8, 2019 12:57 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Janet Munson and I live at 1745 Eleanor in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Clare Hayes <clareandlarryhayes@yahoo.com>
Sent: Monday, July 8, 2019 12:40 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development, My name is _____ Clare Hayes _____, and I live at _____ 2195 Princeton Ave. _____ in Saint Paul. I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal: 1. The no-build scenario 2. A moderately-high-density mixed-use scenario 3. The Ford Master Plan Minimum scenario as outlined in City documents For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents: • These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure. • These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution. • These scenarios are more compatible with existing land use of the surrounding area. • All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA). • All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. • Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community. • Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas: • Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study. • Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing. • Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site. • Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and

weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc. As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue. • Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment. In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services. Thank you for your consideration.

From: Margy Sather Peterson <margy.cs.peterson@outlook.com>
Sent: Tuesday, July 9, 2019 4:23 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Margy Peterson, and I live at 1787 Pinehurst Avenue in Saint Paul.

I am writing about the environmental and community impacts of development at the Ford site.

Please consider inclusion of the following possible development scenarios in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

I am especially concerned that there are no schools within walking distance. More buses means more congestion, noise and pollution.

Thank you for your consideration.

Margy and Paul Peterson
1787 Pinehurst Avenue
St Paul, MN 55116
651 690-5028

Get [Outlook for Android](#)

From: Christa Treichel <ChristaJT@live.com>
Sent: Tuesday, July 9, 2019 4:10 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Dr. Christa Treichel and I live at 1860 Mississippi River Blvd South in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I live across the street from the Mississippi River and near the intersection of Hwy 5/West Seventh and Mississippi River Blvd S/Shepard Road. My main concerns are for the health and protection of the river, plants, and animals/birds and also the noise, traffic, and pollution.

I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
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- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Liz Hathaway-Castelán <hathawaycastelan@msn.com>
Sent: Tuesday, July 9, 2019 2:52 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Liz Hathaway Castelán, and I live at 1681 Saunders Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I am concerned about the housing density being proposed, the lack of additional community services being added to this part (to handle the additional people), and the increase in traffic that will create greater congestion in an already congested area.

The natural barrier of the river on two sides pushes all of the traffic north and east. The planning committee needs to more extensively consider the impact on these areas, as well as the overall impact on the environment and the happiness of the people living in our city - now and in the future.

I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
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- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Beth Brombach <bbrombach@comcast.net>
Sent: Tuesday, July 9, 2019 2:29 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Beth Brombach, and I live at 2214 Goodrich Ave in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: Joanne Routzahn <jroutzahn@comcast.net>
Sent: Tuesday, July 9, 2019 12:31 PM
To: *CI-StPaul_FordSitePlanning
Cc: Catherine Hunt
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Joanne Routzahn _____, and I live at 1875 Palace Avenue _____
in Saint Paul.

FULLY SUPPORT THE WORK AND RECOMMENDATIONS of NEIGHBORS. FOR A LIVABLE SAINT PAUL:

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
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- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

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- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

I fully support the recommendations and actions of Neighbor's for A Livable Saint Paul.

Thank you for your consideration.

Sent from my iPad

From: mfm McGuire83@gmail.com
Sent: Tuesday, July 9, 2019 9:07 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Matt McGuire and I live at 1646 Niles Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Sincerely,

Matt McGuire

From: Matt Reinartz <mgreinartz1@hotmail.com>
Sent: Tuesday, July 9, 2019 8:50 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Matt Reinartz, and I live at 2163 James Ave. in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

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include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Matt Reinartz
2163 James 55105

From: RON BENNETT <rbennett7587@comcast.net>
Sent: Tuesday, July 9, 2019 8:15 AM
To: *CI-StPaul_FordSitePlanning
Cc: Ron Bennett; livablesaintpaul@gmail.com
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

We are Kathryn and Ron Bennett, and live at 700 Mount Curve Boulevard in Saint Paul. We are very concerned about the environmental and community impacts of development at the Ford site. We request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

- 1. The no-build scenario
- 2. A moderately-high-density mixed-use scenario
- 3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

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- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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- Air (Section 16) —Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc. As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment. In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services. Thank you for your consideration.

From: Heather Guggemos <heather.guggemos@gmail.com>
Sent: Tuesday, July 9, 2019 5:22 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Heather Guggemos, and I live at 1217 James Avenue, in Saint Paul. I was born and raised in Highland Park and currently reside one block outside of Highland in MacGroveland.

I am VERY concerned about the environmental and community impacts of development at the Ford site. It's critical to the health and vitality of this community that this development is scaled to protect the environment. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
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As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social

infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Heather Guggemos

From: Deborah Patterson <dfpatter@gmail.com>
Sent: Monday, July 8, 2019 11:31 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is John Patterson_____, and I live at ___1792 Pinehurst Avenue_____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
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Thank you for your consideration.

From: Deborah Patterson <dfpatter@gmail.com>
Sent: Monday, July 8, 2019 11:30 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Deborah Patterson_____, and I live at _1792 Pinehurst Avenue_____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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Thank you for your consideration.

From: Kevin WIER <k2wier@msn.com>
Sent: Monday, July 8, 2019 8:40 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Kevin Wier, and my family and I live at 1050 Finn Street in St. Paul 1/2 block from the Ford Plant and thus will be heavily impacted by your decisions.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

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- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
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In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

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Thank you for your consideration.

From: di.ploetz@aol.com
Sent: Monday, July 8, 2019 5:49 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development, My name is Dianne Ploetz, and I live at 1749 Bayard Avenue in Saint Paul. I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal: 1. The no-build scenario 2. A moderately-high-density mixed-use scenario 3. The Ford Master Plan Minimum scenario as outlined in City documents For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents: • These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure. • These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution. • These scenarios are more compatible with existing land use of the surrounding area. • All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA). • All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. • Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community. • Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas: • Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study. • Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing. • Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site. • Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc. As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue. • Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment. In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services. Thank you for your consideration.

Roberts, Rebecca

Comment Number: 90

From: James Schoettler <james.a.schoettler@gmail.com>
Sent: Tuesday, July 9, 2019 11:52 AM
To: *CI-StPaul_FordSitePlanning
Subject: Comments on Ford Site AUAR
Attachments: Ford AUAR Comments - Schoettler 7.9.2019.docx

Attention: Menaka Mohan, Ford Site Planner

The attachment comprises my comments on the Ford Site AUAR for purposes of the 30-day comment period ending July 10, 2019.

I would be happy to respond to any questions you may have.

Thank you.

James A Schoettler
1906 Eleanor Avenue
Saint Paul MN 55116
james.a.schoettler@gmail.com
651-398-3620

*James A Schoettler
1906 Eleanor Avenue
Saint Paul Minnesota 55116
james.a.schoettler@gmail.com
651-398-3620*

**Comments on the St Paul Draft AUAR Order and Scoping EAW
with
Additional Development Scenario Based on Available Rail Transit**

The Ford Site is an extraordinary development opportunity, with one exception – access. There are no high-capacity arterials serving the Site. All vehicles traveling to or from the site must use local, mostly two-lane residential streets having frequent curb cuts for driveways and alleys. Planned development could increase Highland District population by a third and traffic congestion proportionally.

Highland residents and business owners are reasonably worried they will not get out of their driveways and, if they do, will be engulfed by traffic congestion; customers of Highland retailers will search for more accessible stores elsewhere.

Such an outcome is neither desirable nor necessary.

Transit is the solution to this problem and the key to long-term success for the Ford Site - it must be developed as a transit-based community – and this means rail transit, in addition to BRT and other modes.

Rail transit is the key because the central location of the Site attracts people who – like many current Highland residents - work downtown Minneapolis or St Paul and make frequent trips to the Airport.

A glaring omission in Ford Site planning is rail transit that is connected to the region's growing backbone rail transit system. The AUAR must examine opportunities for connection to this system.

The best opportunity to serve the Ford Site with rail transit is the Riverview Corridor, which also is entering the environmental review stage. This project currently envisions crossing the Mississippi River at Fort Snelling. However, the Fort Snelling crossing is highly problematic and it is likely that an alternative crossing will be needed. It so happens there is one ideal alternative that uses the CP-Spur and crosses from the SW corner of the Ford Site to 54th Street in Minneapolis and connects to the Blue Line just above the Veterans Hospital station. The best location for a Ford Station would be along the southern boundary of the Ford Site, near Cleveland Avenue.

As extensions of the Green and Blue Lines are completed in the next decade and with the Riverview Corridor completed, Ford Site residents can have more than sixty miles of rail transit access to downtown St Paul, downtown Minneapolis, the Airport, Mall of America, and tens of thousands of employers and venues in the Metropolitan Area. With this access, it will be one of the most valuable locations in the region and will have far less impact on local traffic than it would without rail transit.

It is important to add that not only will this new crossing serve the Ford Site, it will eliminate all the problems with the proposed Fort Snelling crossing and save a quarter billion dollars (I will gladly provide the reasoning behind this claim.) A true win-win-win is possible, as the acquisition of the CP-Spur would enable Ryan to obtain a large part of the 13-acre CP property that it desires. And, as demonstrated by the recent St Paul CP-Spur study, the CP-Spur can include both rail transit and a pedestrian/bicycle trail that, connected to Shepard Road trails, could reach downtown St. Paul. The new crossing at the Ford Site would also include a trail connection to the west side of the river.

It is essential that the AUAR include a study of this alternative rail alignment and river crossing and the benefits to Highland Park residents - especially the reduction of auto traffic and congestion from Ford Site residents and the greatly improved access to rail transit for all Highland residents. There are few measures available that can have such a positive effect on the Ford Site and Highland Park.

In the AUAR and Scoping EAW, this new crossing must be fully compared to the Fort Snelling (HWY 5) crossing, measured from the point at which the CP-Spur crosses West 7th Street to the connection of each alternative to the Blue Line. This will demonstrate that the proposed Ford Site crossing is far superior to the Fort Snelling crossing while it substantially improves Ford Site access.

St Paul should also ask Ramsey County to include this alternative in its coming environmental review of the Riverview Corridor Locally Preferred Alternative and timely provide detailed comparative information for purposes of the AUAR and Scoping EAW.

Roberts, Rebecca

Comment
Number:
91

From: smithfamily436@gmail.com
Sent: Monday, July 8, 2019 2:39 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Plant Development vs. Our Home

To Whom it May Concern,

We are current residents of Mount Curve Blvd. for the last 17 years. Our home was owned by my husbands Grandparents for 40 years prior to our purchasing it. So our family has been in this home for over 50 years. We love living here. The kind neighbors, beautiful yards, quiet, wide street and great community. We are writing with GREAT concern about the Ford Plant development.

Since our purchase of this home, we have seen our property taxes go from \$3000. to almost \$10,000. And we are still here. I'm a teacher and my husband has a good job but we still struggle thanks to the city. We have seen close friends move away because of these taxes and still, we have stayed. We never used to hear traffic on Cretin Ave. and now it sounds like a highway. But we're still here. It isn't until news of the new Ford development have we said, "Maybe we should leave."

Increased traffic, Highland becoming even more impossible to traverse and word of increasing our taxes even more to fund this mess are the last thing we need. We are heartbroken. This is our home you're talking about changing. Our. Home. My husband grew up here, our kids took their first steps & celebrate birthdays and holidays here. We don't want to leave. But how can we stay when you are threatening everything we've known and loved about this neighborhood.

The LAST thing we need is more traffic, more people and higher taxes. We are begging you to reconsider the number of residents, the traffic routes and funding for this project. We need more green space and parks for our smallest residents. Who are the future of this community. Have you considered them?
Thank you for your time and consideration.

Sincerely,
Tim, Maria, Ben, Lucy and Luke Smith

Sent from my iPhone

TO: City of St. Paul Ford Site Planning Staff

FROM: Mathews Hollinshead

Comments on the Scope of the Proposed Ford Site AUAR, July 10, 2019

In the transportation category, the scope of the AUAR should match the full quality of the opportunities at the Ford Site. Unfortunately, as proposed this part of the AUAR looks most like a traffic study, not an environmental assessment. If it's to be essentially a traffic study, then vehicle traffic congestion will end up being the limit on personal vehicle use, and strong measures will be needed to keep congestion where it belongs, on arterials, and protect existing residential streets and their homeowners. If the transportation part of the AUAR can instead be broad enough to include options such as a transitway and even congestion pricing while still protecting existing residential streets and homeowners, it could support important principles and features that become possible with a broad scope.

Three lenses could help to scope the AUAR properly: 'Transit Village,' 'EcoDistrict,' and 'Aerotropolis.'

Transit Village

'Transit Village,' from the 22-year-old planning classic *Transit Villages for the 21st Century* by [Michael Bernick](#) and [Robert Cervero](#), is not in the Ford Plan, which does not contain a central transit station. Despite acknowledged lack of freeway access, the underlying transportation assumption of the Ford Plan and therefore the AUAR is that most trips will take place by owner-occupied motor vehicle, so the transportation part of the proposed AUAR seems likely to be a traffic study, not a broad environmental model including such things modal shift incentives. The AUAR might at least address emissions by modeling a large scale use of electric vehicles but such a scenario is not in the Ford Plan either.

The City of Saint Paul's FAQ webpage says the following about transit:

"The City will work closely with Metro Transit to look at routing transit service through the Ford Site once redevelopment occurs, connecting it to the area transit network."

The statement confirms that development will determine transit, rather than the other way round. In answer to a question at a July 9 meeting of the Highland District Council Transportation Committee, city staff said Metro Transit and Metropolitan Council transportation staff were not listed as scheduled to attend AUAR open houses. I hope that changes.

Another indication that the AUAR will not be broad enough is that it does not include the full CP rail spur; it includes the rail yard, but without the spur the yard is just another development site, not a future transit station option.

We live in a very different world than just a few years ago, a different world even than the one in which the current Ford Site Plan was finalized. Transportation has recently become the number one climate emission emitter. More young people starting out today don't want cars or even houses. The AUAR should be scoped to include such trends. New York State just approved congestion pricing for Manhattan. From a climate perspective there is no time left for traffic. The real solution is reducing traffic itself, but the Ford Plan and thus the AUAR as proposed essentially leave mode choice up to congestion. This in the face of clear, longstanding evidence that congestion by itself produces no substantial mode shift. On the other hand, preponderant evidence exists proving that congestion pricing produces mode shift. Congestion by itself certainly produces stress, wastes time and elevates pollution but, as long as there is no monetary penalty for driving, people still choose to drive, because of the false freedoms we have built into our land use and transportation funding policies over the past 60 years.

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Transit Representative, Transportation Advisory Board, Metropolitan Council. These comments do not represent positions of TAB or the Metropolitan Council, but rather are mine as one TAB's transit mode member representatives.

From: Mathews Hollinshead <mathews.hollinshead@me.com>
Sent: Wednesday, July 10, 2019 3:35 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR comments
Attachments: 190710 AUAR Scoping Comments.pdf

TO: City of St. Paul Ford Site Planning Staff

FROM: Mathews Hollinshead

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Sent from my iPad

TO: City of St. Paul Ford Site Planning Staff

FROM: Mathews Hollinshead

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From: Kate Dienhart <katedienhart@gmail.com>
Sent: Wednesday, July 10, 2019 11:22 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Catherine Dienhart and I live at 1944 Bayard Ave. in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

- Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.
Catherine Dienhart

From: Nora Nell Hamburge <noranell@gmail.com>
Sent: Wednesday, July 10, 2019 7:57 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is _Nora Nell Hamburge_____, and I live at _____1752 Montreal Ave _____ in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) —Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please

include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

As a life long resident of Highland Park I'd like to see the neighborhood flourish, but not at the cost of losing what made it special to begin with. I believe a compromise is possible.

Thank you for your consideration.

From: Jim Ginther <jamesmginther@gmail.com>
Sent: Wednesday, July 10, 2019 1:25 AM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Jim Ginther, and I live at 1019 Colby St., in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I am particularly concerned with density. The Highland neighborhood has an approximate population of 24,000 residents. If the planned 3850 units are built, then there will be more than 7,000 new residents jammed into less than one fifth of a square mile; since a square mile is 640 acres of land and the Ford Site is only 122 acres. This will increase the size of the Highland population by almost a 1/3.

I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
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- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) —There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
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congestion is of particular concern and should be included in this testing.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

From: ute bertog <utebertog@hotmail.com>
Sent: Wednesday, July 10, 2019 3:35 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Ute Bertog, and I live at 1575 Summit Avenue in Saint Paul.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario
2. A moderately-high-density mixed-use scenario
3. The Ford Master Plan Minimum scenario as outlined in City documents

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios mean a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA).
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat.
- Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

- Contamination/Hazardous Materials/Wastes (Section 12) — There has been no specific plan published for the mitigation of Area C pollution, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.
- Air (Section 16) — Given the current environmental concern over CO2 in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter emissions associated with idling cars in traffic congestion is of particular concern and should be included in this testing.
- Noise (Section 17) — It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project

sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

- Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

All the best,

Ute

From: zoyalisa@aol.com
Sent: Wednesday, July 10, 2019 3:52 PM
To: *CI-StPaul_FordSitePlanning
Subject: AUAR Comments

Dear Ms. Mohan and Members of the Department of Planning and Economic Development:

My name is Elisa Hayday and I live at 2112 Berkeley Avenue in Saint Paul. When I first heard that the Ford site was to be reborn, I had hopes for an extension of green space along the national treasure that is the Mississippi River. The decisions that are made about the use of this land will be crucial to the quality of life of those who already live nearby and those who might choose to come to the area in the future. Whatever we do here, with this rare opportunity, is likely to garner attention from far beyond St. Paul.

As the atmosphere continues to warm, there is need for more trees and green space to mitigate the effects of an urban heat island. Environmental impacts of each development scenario must be compared. A high-density development would be a mistake in an area that already suffers from excessive traffic. I cannot imagine adding significantly more cars to roads such as Cretin, Cleveland, Ford Parkway, and the Mississippi River Boulevard. Traffic studies should include peak times of day and consider the impact of additional personal vehicles, trucks, mail and private delivery vehicles, recycling and trash pickup, and school and city buses. The effects of increased traffic on all roads leading to and from I-94, 35-E, and Hiawatha/55 should be studied. Environmental studies must include consideration of air pollution from cars idling in congestion. Area C pollution must be mitigated. Costs to maintain and upgrade road and sewer as required by each alternative (whether no-build, moderately high density, or Ford Master Plan minimum) should be compared.

I won't forget the times that I've seen eagles and a large owl as I walked along Mississippi River Boulevard. I am not the only person who feels that such an experience within a city is a gift not to be squandered. If we want people to stop moving further out of the city to find affordable and desirable environments, we need to make very careful decisions about which areas of the city are best suited for higher density. Please ensure thorough study and consideration alternatives to high density for this area.

Elisa Hayday

From: Schriver, Daniel J <dan_schriver@uhg.com>
Sent: Wednesday, July 10, 2019 12:37 PM
To: *CI-StPaul_FordSitePlanning
Cc: livablesaintpaul@gmail.com; djschriver@yahoo.com; maradarge@yahoo.com
Subject: Public Comment

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Daniel Schriver, My wife, son and I live at 1110 Bowdoin Street, which is a block away from the Ford site.

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.

2. A moderately-high-density mixed-use scenario
 - 1500 dwelling units
 - 94,000 sq. ft. of GFA retail/service
 - 125,000 sq ft. of GFA office/employment
 - 31,000 sq. ft. Of GFA civic/institutional(Note that this housing density is still well above what was originally considered by the City when evaluating alternatives in 2007).

3. The Ford Master Plan Minimum scenario as outlined in City documents

2400 dwelling units

150,000 sq. ft. of GFA retail/service

200,000 sq. ft. of GFA office/employment

50,000 sq. ft. Of GFA civic/institutional

For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat
- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
- Including lower-density scenarios in the AUAR will provide greater contrast for comparison with the City and Ryan proposals. The City's scoping document includes only two (high-density) development scenarios which are nearly identical.

In addition, the AUAR scoping document implies that minimal consideration will be given to several important relevant environmental issues. I request that additional consideration and study be applied to the following AUAR topic areas:

Contamination/Hazardous Materials/Wastes (Section 12) — After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of “understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report.” Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR study.

Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project’s traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

Noise (Section 17) — The scoping document suggests that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is all but impossible that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional traffic, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) — Vehicular traffic in this area fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the **traffic study** accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city busses, school busses, etc.

As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue.

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In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Dan and Mara Schriver

Dan Schriver | Sourcing and Procurement Consultant, Direct Mail | UnitedHealth Group - Enterprise Sourcing and Procurement
MN017-W800 | 9700 Health Care Lane, Minnetonka, MN 55343 | 952.979.6403 | dan_schriver@uhg.com



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Roberts, Rebecca

Comment
Number:
99

From: Charles Hathaway <hathaway@iphouse.com>
Sent: Wednesday, July 10, 2019 12:21 PM
To: *CI-StPaul_FordSitePlanning
Cc: livablesaintpaul@gmail.com
Subject: Comments on the draft AUAR scoping document

Dear Ms. Mohan and Members of the Department of Planning and Economic Development,

My name is Charles Hathaway, and I live at 507 Montrose Lane in Saint Paul.

Regarding the draft scope, I agree with the ideas put forth by Neighbors for a Livable Saint Paul (NLSP), and expressed in the letter below. A range of scenarios, including a no-build and moderate density scenarios need to be included in the AUAR so as to provide comparison and a true sense of the impact of the City's (and Ryan's) high-density proposal. Please also add my voice to the expressed need for expansion of the scope on the specific AUAR items listed in the NLSP letter.

Furthermore, I believe that an additional traffic-related item should also be examined in the AUAR: parking. As I understand it, the City's plan allows for minimal parking on the Ford site. But many of the 8000 or so new residents will bring cars, and retail/office operations will also require parking. It therefore seems likely that the surrounding neighborhoods will end up being used for Ford site parking — creating difficulties for the neighbors. Parking may not normally be addressed in a "traffic" study, but in this case the likely parking problems are of sufficient concern to warrant inclusion.

Finally, I would like to emphasize the point that the social impacts of the Ford development have not been adequately assessed. The extreme population density proposed for the Ford site cannot help but strain public services such as fire protection, policing, schools, library, parks and other recreational services and programs. As Tony Barranco of Ryan Companies has stated, "the AUAR is intended to address ALL the impacts of the proposed development on the surrounding community." Social impacts should therefore be included with the AUAR. If not, a separate study should be initiated to examine these critical issues.

Thank you.

(The NLSP letter, which I endorse, is provided below.)

I am very concerned about the environmental and community impacts of development at the Ford site. I request that the following possible development scenarios also be considered in the AUAR to provide a better comparison of impacts with those of the current proposal:

1. The no-build scenario (implying minimal construction and build-out at the Ford site, with the proposed housing being instead distributed at various infill locations across St. Paul, and much of the Ford site instead used for park, recreational, and wildlife habitat). This scenario is more consistent with the incremental development model of making modest investments over a broad area over a long period of time. The incremental development model stresses the use of existing infrastructure in the city.

2. A moderately-high-density mixed-use scenario

1500 dwelling units

94,000 sq. ft. of GFA retail/service

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For the following reasons, any and all of the above scenarios are environmentally superior to the scenarios already identified in the AUAR scoping documents:

- These suggested scenarios would imply smaller and fewer buildings, more green space, and fewer trips into and out of the development. This implies reductions in noise, traffic congestion, pollution, and impacts to wildlife and infrastructure.
- These scenarios would be more easily accommodated by existing street grids, adjacent arterial streets, and existing transit systems. This means a reduction in need for road improvements, and reduced exacerbation of already-existing problems of traffic congestion and resultant air pollution.
- These scenarios are more compatible with existing land use of the surrounding area, which is primarily low to medium-density residential with accompanying limited commercial development.
- All of these scenarios will have reduced impact on the Mississippi River Corridor Critical Area (MRCCA), designated as a state critical area to protect its many unique, natural, and cultural resources and values. This will help preserve vistas of the river bluffs, and have less impact on the more than 325 bird species that migrate along the Mississippi Flyway.
- All of these scenarios allow a reduction in the negative impact to the Mississippi River gorge wildlife habitat. The gorge is home to a large variety of large and small mammal species. Other wildlife habitat impacts would also be reduced; for example, the lower-density scenarios would present less disturbance to bald eagle nesting habitat

- Although social benefits are not explicitly addressed in the AUAR, consideration of lower-density Ford site alternatives is important with respect to the overall benefit to the city. Incremental and dispersed infill development across the city distributes City financial and infrastructure support to parts of the city that may need it more, and tends to be more long-lasting and financially sound for the community.
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Air (Section 16) —The AUAR scoping document indicates that the vehicle emissions analysis is limited to measuring carbon monoxide (CO) impacts of the project's traffic generation, and that no further air quality analysis is anticipated for the AUAR. Given the current environmental concern over CO₂ in the atmosphere, and given that the underlying purpose of this high density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a more thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios. The emission of particulate matter associated with idling cars in traffic congestion is of particular concern and should be included in this testing.

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Impact on infrastructure and services — The AUAR study should include an evaluation of the impact that all proposed scenarios will have on traffic infrastructure, including the effects of construction and service vehicles on existing roads and infrastructure. It should also address the effects on city storm and sanitary infrastructure, to include increased needs and costs for both storm and sanitary water treatment.

In addition, the AUAR study should include an evaluation of how the added density will impact the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR study should also address the economic impacts of supplying and maintaining infrastructure and services.

Thank you for your consideration.

Roberts, Rebecca

Comment Number: 100

From: Greg and Missy Struve <mgstruve@msn.com>
Sent: Wednesday, July 10, 2019 10:09 AM
To: *CI-StPaul_FordSitePlanning
Cc: Greg and Missy Struve
Subject: Comments on Ford Site Draft AUAR Order and Scoping Document
Attachments: FordRedevAUARComments.docx

Attached find my public comments on the Ford Site AUAR. Please include in the public record.

If you have any problems opening or if you have any questions or comments, please contact me by email or by Cell at 651-492-8034.

Thank you for your consideration.

Greg Struve (Complete address in attachment)

Sent from [Mail](#) for Windows 10

Public Comment

Ford Site Draft Alternative Urban Areawide Review (AUAR) Order and Scoping Document

By: Gregory P Struve, PE (Civil Engineering)

1756 Hartford Ave (Highland Park Neighborhood) St Paul, MN 55116

As a lifelong Highland resident, I appreciate the opportunity to provide comments on the Draft AUAR Order for the Ford Redevelopment. I offer the following comments and recommendations:

The Ford Redevelopment will have a large impact on the neighborhood, over 35% growth.

First note that this redevelopment will add over 35% more housing units to the Highland Neighborhood. Current housing units number 11,357 (2017: mncompass.org). The draft AUAR proposes an additional 3800 (Ryan) or 4000 (Master Plan) housing units. Using similar population densities, over 8720 people will be added to the neighborhood. This is population only. It does not include the impacts of additional: Retail and Service of 150,000SF (Ryan) to 300,000SF (Master Plan), Office and Employment of 265,000SF (Ryan) to 450,000SF (Master Plan), and Civic and Industrial of 50,000 (Ryan) to 150,000 (Master Plan).

No new Public Transit Systems are proposed to handle this large population growth.

No additional Bus Routes or any type of public transit has been proposed through or adjacent to the Ford Redevelopment. This new population, in addition to the existing population, will need ready access to both Downtowns, the Airport, MOA and other employment centers. Managing the transit needs has been left to the existing bus system and additional automobile traffic in an area of limited arterial roadways. This additional traffic detrimentally affects Sections 18: Transportation; 17: Noise; and 16: Air Quality of the Draft AUAR.

Additional Public Transit is available.

The current Riverview Corridor LPA contains no consideration for the Ford Site and it's large impact on traffic. Altering the LPA to include a Light Rail Transit (LRT) Station at the Ford Site would make a significant difference in use of Public Transit and reduce traffic impacts. This would have positive Environmental effects in Sections 18, 17 and 16 and improved general lifestyles. An alternative Riverview Corridor LRT alignment through the Ford Site is available and feasible with travel time and cost savings over the current LPA.

The AUAR Order should include this LRT Alternate.

To determine the beneficial environmental and economic effects of an LRT Station at the Ford Redevelopment, the AUAR Order should include this alternate in Section 18: Transportation.

Roberts, Rebecca

Comment Number: 101

From: Luba Hickey <hicke002@umn.edu>
Sent: Wednesday, July 10, 2019 3:50 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford sitewhat are elites in Saint Paul thinking!

Results of Indiana School of Public Health and Environmental Affairs by Prof. Thomas Stuckey and John Ottensmann show “that rates of murder rape, robbery and aggravated assault are generally higher in areas of high density residential development and commercial property”. The National Institute of Health studies show green spaces affect your health for the better!

Why is high density, and all the negative aspects of this plan, being forced upon the us?

Sent from my iPad

Roberts, Rebecca

From: Luba Hickey <hicke002@umn.edu>
Sent: Wednesday, July 10, 2019 3:52 PM
To: *CI-StPaul_FordSitePlanning
Subject: Fwd: Nurturing Healthy Neighborhoods | NIH News in Health

Sent from my iPad

Begin forwarded message:

From: Luba Hickey <hicke002@umn.edu>
Date: June 28, 2019 at 7:03:08 AM CDT
To: Hickey Luba <hicke002@umn.edu>
Subject: Nurturing Healthy Neighborhoods | NIH News in Health

<https://newsinhealth.nih.gov/2018/11/nurturing-healthy-neighborhoods>

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Roberts, Rebecca

From: Luba Hickey <hicke002@umn.edu>
Sent: Wednesday, July 10, 2019 3:51 PM
To: *CI-StPaul_FordSitePlanning
Subject: Fwd: SPEA study shows links between land use and violent crime rates: IU News Room: Indiana University

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Date: July 10, 2019 at 3:43:30 PM CDT
To: Hickey Luba <hicke002@umn.edu>
Subject: SPEA study shows links between land use and violent crime rates: IU News Room: Indiana University

<http://newsinfo.iu.edu/news/page/normal/13030.html>

Sent from my iPad

IU News Room

IU News from all eight campuses

Friday, July 12, 2019

SPEA study shows links between land use and violent crime rates

Land use matters when it comes to predicting violent crime rates, according to results of a study by two professors in the IU School of Public and Environmental Affairs at Indiana University-Purdue University Indianapolis.

Thomas Stucky and John Ottensmann show that rates of murder, rape, robbery and aggravated assault are generally higher in areas with high-density residential developments and commercial property, and generally lower in areas characterized by industry, parks and schools.



Illustration by Ned Shaw

But the correlations aren't always straightforward. They are influenced, to varying degrees, by socioeconomic factors such as poverty rates and neighborhood residential stability.

"We found you couldn't look at either the socioeconomic characteristics of a neighborhood or the land-use configurations separately," Stucky said. "It's critical that you understand both in order to understand the crime patterns."

The study, titled "Land Use and Violent Crime," was published in the November 2009 issue of the journal *Criminology*. It employs geo-coded Uniform Crime Report data for the city of Indianapolis, along with

information on 30 categories of land use and demographic information from the 2000 U.S. Census, to map relationships between land use and crime. The research was sponsored by the Indiana University Public Policy Institute (<http://policyinstitute.iu.edu/index.aspx> (<http://policyinstitute.iu.edu/index.aspx>)).

While other studies have examined crime rates by geographical units such as street blocks or Census tracts, Stucky and Ottensmann took an innovative approach. They used data for 1,000-by-1,000-foot grid squares, providing objective and precise plotting of land-use types and crime locations. Also, previous studies of crime and land use tended to focus on specific uses, such as proximity to taverns or schools; and they often looked at land use independently of socioeconomic factors.



(<http://newsinfo.iu.edu/asset/page/normal/8340.html>).

Tom Stucky

[Print-Quality Photo](#)

(<http://newsinfo.iu.edu/asset/page/normal/8340.html>).

Some of the results are, on the surface, not unexpected -- for example, that there are more robberies in commercial areas. But putting both land-use categories and socioeconomic factors in the mix led to complex and sometimes surprising findings. For example, in "disadvantaged" areas with no commercial land use, rates were higher than average for homicides but lower than average for other violent crimes. At the same time, in better-off areas with commercial land use, rates are higher than average for robbery but low for other violent crimes.

"People might expect the rates for homicides and robberies to both be higher in disadvantaged areas, but we didn't find that," Stucky said. "This allows you to think in more nuanced ways about where you would expect to see different crime configurations."

The study found higher rates of all types of violent crime in areas of high-density residential land use, even after controlling for overall population. The correlation was more pronounced in disadvantaged areas but held true in other areas as well.

"There seems to be something about (high-density residential) units that is associated with all types of serious violent crime, even controlling for the other factors in the model," the authors write. "Apparently, high-density housing units promote serious violent crime."

Generally speaking, the study found higher rates of robbery, aggravated assault and rape in commercial areas, and higher rates of all violent crimes in areas traversed by major streets. It found generally lower violent crime rates in areas with parks, cemeteries and schools.

Stucky is a criminologist and former law enforcement officer, while Ottensmann is an expert in urban land use, especially the development of land-use models. Their collaboration took root several years ago when Stucky attended a presentation by Ottensmann on LUCI, the Land Use in Central Indiana model, which facilitates urban planning by showing the relationship between policy choices and development.

They realized that, with massive data sets available on both land-use patterns and crime, it made sense to combine the topics -- and their research specialties -- and look for relationships.

"It's a perfect example of the kind of collaboration that comes out of serendipity, being in the right place at the right time and open to new opportunities," Stucky said.



From: Sherry Goodman <sgoodsgood@gmail.com>
Sent: Wednesday, July 10, 2019 4:02 PM
To: *CI-StPaul_FordSitePlanning
Subject: Suggestions for Consideration from owner of two Highland Properties

Good afternoon,

A few suggestions to consider.

Not every acre should be developed and spoken for. There needs to be time and much thought during the building process to see how things fit and need to be altered.

It is hard to undo poor choices. This isn't like packing a suitcase. Please use high quality design , materials natural to the area- stone, wood, water, trees and natural greenery.

A unique landmark building designed just for this beautiful area for us all to visit and enjoy as a public treasure.

Walking paths featuring built in exercise, stretches for adults and younger to lure and challenge people of all ages.

Art installations.

Thank you!

Sherry Goodman

Online Comment**COMMENT NUMBER:** 104**DATE/TIME:** 7/10/2019 10:54:00 AM**NAME:** Susan Duffy**COMMENT:**

1.) Fairview, the street where I live , in more recent years 1-2 in my 15 years of living here, I have begun to notice a new more substantial rumble of my house when truck drive by and even some cars. Can Fairview handle more traffic and why is this shake increasing. And, what effect is this having on my home? How much more heavy traffic and what will the increasing degree of the rumble have on the homes near Fairview. Considering 120 Acres of building material is being brought into the area via this road and others, how will this damage my home and my sewer? When the airport reroutes planes overhead, when flying low, they create less of a rumble than the newer traffic rumble/ shake.

2.) From the talk at our annual block party, the underground reservoir is growing (Bayard, Elenor , Prior) , this has caused issues with our infrastructure, mainly sewers extending East and West. Will the Ford Site impact the growth of these reservoirs and the deteriorate of some of the infrastructure at a greater rate than expected? And if you run infrastructure through, how will this affect the many water reservoirs, especially the ones that are increaseing? or decreasing and will this create more sinkholes by altering or increasing traffic? (We have had 2 sinkholes in the past decade in this area of highland)

3.) Over the past few years (2-4) , I am seeing a huge increase in neighborhood wild life in the past (outside of Rabbits, squirrels, and raccoons) that has historically since the development of our neighborhood (my neighbor has lived in her home since it was built and was one of the first homes built except for the Farm house, and she used to rarely see any of the current wild life- we also have a lot of really long term residences so this knowledge has been acquired by neighborly conversation over the many years). Considering the clean up of the Ford Site, what percent of these animals were displaced from the factory surroundings. Was there a study of the animals when it was a plant vs now and what will be. When the Ford site turns from being an Industrial to a residential area, will these animal be able to return to some more native habitats along the river? Why are these animals now hunting in my yard so far up from the river? Does it have something to do with the Ford Site? What other animals can we expect might follow? The proximity to the river and animal hunting grounds, will animals be displaced for hunting- I never worried about wild animals when my kids were babies at our home, but will I when I have grand babies? With the Ford Site undergoing all the recent changes, how can we maintain the neutral boundaries between humans and wild life? If wildlife finds area C to be convenient area to hunt, live , migrate by, etc... because the rest of the area has modest green space and lots of humans density, what can we expect of animals being pushed to such a toxic area?

Online Comment

COMMENT NUMBER: 105

DATE/TIME: 7/10/2019 8:46:00 AM

NAME: Wendy Matthews

COMMENT:

I continue to be very concerned about the over development of the Ford plant. The lower the density/minimum building the better in my eyes. We already have an existing traffic problem in the area. Over development would only add to this existing problem and road improvement/ air pollution. Please consider fewer dwelling units, minimum development. Thank you.

Online Comment**COMMENT NUMBER:** 106**DATE/TIME:** 7/9/2019 10:44:00 PM**NAME:** Heidi Schallberg**COMMENT:**

The scoping worksheet references documenting “the availability of transit and other transportation modes.” This scope needs to specify that the traffic impacts to be studied and recommendations will include those for pedestrians and bicyclists, not just identify “availability.” The work should reflect the priorities outlined in the city's new comprehensive plan that prioritizes pedestrians first, then bicyclists, with an emphasis on safety. Considering that the guiding principles for the site, as outlined in the Ford Site Zoning and Master Plan, include an “interconnected system of streets, bikeways, and walkways that is safe and accessible for people of various ages and abilities,” an explicitly multimodal scope for this study is critical to determine potential improvements and any needed mitigation for ALL modes. The intersections identified for detailed analysis in Fig. 8 are very important for people traveling along AND ACROSS on foot, by wheelchair, or on bikes as well, and these needs must be included in that analysis.

Pedestrian and bicyclist access to and interaction with existing or future transit service should be included. This may include bicyclist interaction with transit vehicles where bicycle lanes are anticipated to be provided, such as on Montreal, and unsignalized crossings that provide access to transitways, such as the A Line station at Ford Parkway and Woodlawn, which has been a difficult crossing for pedestrians.

It's unclear from reading this if the AUAR would include proposed pedestrian and bicycle facilities on Ford Parkway and Mississippi River Blvd that are included in the Ford Site Zoning and Master Plan. They should be. Where bicycle and pedestrian facilities are planned only on one side (such as the bi-directional bicycle lane planned on Ford Parkway), special attention should be given to crossing needs to ensure travelers on foot and bike can safely and conveniently reach frequent destinations on the other side. Adding a trail on only part of the east side of MRB also creates crossing needs to continue on facilities beyond this Ford site portion.

The city's Bicycle Plan identifies the current need for improved connections between Mississippi River Boulevard and Ford Parkway, including a trail bottleneck under the Ford bridge. If this portion is somehow determined to be outside the scope of the AUAR, the city needs to initiate a study of use on Mississippi River Blvd for its full length to ensure this portion of the Grand Round can meet the current and future multimodal needs and demand for this national resource. The route is identified by the National Park Service as part of a National River and Recreation Area, and it is also part of US Bicycle Route 45.

Online Comment

COMMENT NUMBER: 107

DATE/TIME: 7/9/2019 12:53:00 PM

NAME: James Winterer

COMMENT:

Hello, my name is Jim Winterer and for 25 years I have lived at 1032 Bowdoin Street, which is three houses from the Ford site.

I would like to comment on the extreme level of density proposed for the Ford site, and the total failure of the plan's stated goal of integrating the Ford site with the surrounding community.

To quote from the Ford plan's own website, it is supposed to be a "well-designed urban neighborhood that complements and integrates into the Highland Park area and broader community."

And another quote: "This site will be woven into the existing community."

This is a real challenge when the current plan calls for density levels for the Ford site that will accommodate ... on just 122 acres ... the entire population of International Falls with room left over for the residents of Grand Marais. Or another example: all of those living in Two Harbors with room left for the residents of Ely.

We are talking about proposed density levels that will be among of the highest in the country, approaching the kind of levels found in some parts of New York City.

The street system surrounding the Ford site was never designed to accommodate this kind of density. I have attended every Ford meeting open to the public and recall at early meetings hearing city planners say that while a sports stadium was suggested early in the process as a possible use for the 122-acre site, that kind of use was ruled out because the streets surrounding the site would not be able to handle that kind of traffic.

If the planners didn't think the streets could handle the congestion generated by a stadium, what makes them think the streets could handle the extra congestion generated by dropping the equivalent of another city into the heart of Highland Park.

Make no doubt about it: This extreme level of density will be a life-changer for Highland and is a cruel trick being played on those who live here.

The city is trading the \$20-million-plus in increased annual property tax revenues for a scheme that will destroy the wonderful character of our neighborhood. This is not fair to all of us who have purchased a home and have chosen to plant our roots here. If we wanted to live in the kind of density this plan will bring, we could have bought a home in the horribly congested Uptown neighborhood of Minneapolis, or for that matter, a place in Manhattan.

I am not writing today to criticize a particular aspect of the Ford site plan. I am writing to say the plan is thoroughly flawed at its heart and needs a total overhaul so that it can meet its stated goal of a development that "complements and integrates into the Highland Park area and broader community."

Online Comment**COMMENT NUMBER:** 108**DATE/TIME:** 7/8/2019 3:05:00 PM**NAME:** Catherine Hunt**COMMENT:**

Dear Ms. Mohan and Members of the Department of Planning and Economic Development Council:

The Ford Alternate Urban Area-wide Review [AUAR] is seriously flawed due to its limited scope, exclusions and serious omissions and fails to fulfill its stated goal on page 8: "The intent of the AUAR is to identify the worst-case potential impacts and the mitigation required to compensate for those impacts." The AUAR flaws create the perception that the city and Ryan are going through the motions to appear as though public comment will be valued and incorporated into the AUAR. Nevertheless, my comments are submitted below for the public record.

Contamination/Hazardous Materials/Wastes (Section 12) — AUAR omits study of Area C and its impact on Ryan's parcel. After reviewing initial pollution studies of the Ford property, The Friends of the Mississippi wrote a letter to the Minnesota Pollution Control Agency on July 14, 2017, warning of "understated water quality contamination at the site and a significant risk of future contamination to groundwater and the Mississippi River that is not adequately addressed in the Report." Their concerns relate to Area C, which is adjacent to but not included in the Ryan plans for development. There has been no specific plan published for the mitigation of this polluted site, however, the pollution there may have direct and/or indirect impacts to the Mississippi River and to area residents. An evaluation of potential environmental impacts of Area C should be included in the AUAR.

Air Quality (Section 16) —The AUAR excludes any further air quality analysis. it is imperative that air quality be monitored during construction due to massive numbers of moving and idling construction equipment in use over 10-12 years. In addition, given that the purpose of this high-density development is to reduce car use and harmful emissions, it would seem logical and prudent for the AUAR to include a thorough study of vehicle emissions and their health impacts, comparing current and future development scenarios.

Noise (Section 17) — The AUAR omits noise assessment. The AUAR claims that additional vehicular traffic generated during construction and resulting from the completed project will be well below a sound increase that would be noticeable, and that no further noise analysis will be conducted as part of the AUAR. It is ludicrous to claim that noise generated by a project of this scale will not be noticeable. Please include in the scope of the AUAR study an evaluation of potential increase in noise due to construction, and post-project sources of noise including additional construction traffic, back-up alarms from construction equipment, air handling units, and ongoing commercial and maintenance activities at the site.

Transportation (Section 18) —The AUAR limits assessment of vehicular traffic in this area that fluctuates dramatically depending on the time of day, time of year, and weather conditions. It is important that the traffic study accounts for all of this. For example, traffic increases when school is in session, and significant traffic is generated by commuters to the local public and private universities, as well as to

area public and private primary and secondary schools. The traffic study should also take into consideration the additional truck traffic visiting the site; private residence and commercial deliveries, trash and recycling, maintenance, mail, city buses, school buses, etc. As has been noted, the impact of additional traffic extends outward from the Ford property toward arterial streets, highways, and freeways. The AUAR traffic impact study should be expanded to include: Cretin Avenue to I-94, Cleveland Avenue to I-94, Fairview Avenue in both directions to the freeways, Montreal to 35E, Randolph to 35E, Mount Curve Boulevard, Mississippi River Boulevard, and Ford Parkway along 46th to Hiawatha Avenue. Finally, the traffic study is conducted by SRF, the same consultant, that conducted the first study which is widely criticized for its dubious conclusions and limited scope. Why should we trust this consultant to conduct a fair assessment of the traffic impact and contradict its previous findings? SRF is not a credible choice to conduct the traffic study.

Impact on infrastructure and services on the adjacent neighborhoods — The AUAR omits evaluation of the impact proposed scenarios on adjacent neighborhoods. Adding anywhere from 3800 to 4000 residential units, commercial, industrial and recreational will impose a massive burden on city storm and sanitary systems. Furthermore, the AUAR omits studying the impact of construction and massive density on existing roads. The AUAR omits evaluation of the impact of high density on the social infrastructure — existing and future community access to libraries, park and recreational facilities, schools, transportation, police, fire fighting services, etc. The AUAR should include evaluating the impact of high density on infrastructure and services noted in this section.

Roberts, Rebecca

Comment
Number:
108

From: Peggy Lynch <peggyalynch@gmail.com>
Sent: Monday, June 17, 2019 9:58 AM
To: *CI-StPaul_FordSitePlanning

I am very concerned about traffic both in the Village and in the neighborhood. Traffic is bad now at certain times and will increase with the addition of 3,800 residential units (5,000 or 6,000 people). Please don't say people will walk or bike. This is not going to happen to have any impact on the auto traffic.

Peggy Lynch

Roberts, Rebecca

Comment Number: 109

From: Eileen Mackin <emackination@outlook.com>
Sent: Sunday, June 16, 2019 1:12 PM
To: *CI-StPaul_FordSitePlanning
Subject: Ford Site Plan

Follow Up Flag: Follow up
Flag Status: Flagged

I am writing to express my concern with one aspect of the Ford Plan and that is the throughway at Saunders Ave. If you push Saunders through and into the Ford property, I believe you will be taking land already in public use by the Public Housing Agency of St. Paul. Also, by extending that street, you will be putting residents who walk at considerable risk. There are many disabled people and elderly people that walk in this part of Highland Park and having to cross two busy intersections within a block of each other will cause problems. There are also blind residents that already find it extremely difficult to safely cross this resident rich area. Putting Saunders through will disturb the peaceful setting at the back of the tall hi-rise located on Cleveland and impede their resident's safe walking areas. The noise level will no doubt increase exponentially with two heavily trafficked streets so close together. It will also put at risk all the children playing baseball at the little league games, it will be a heavily used street on either side of the baseball diamonds. Those children bike, walk, and ride in cars to the diamonds. And there is another issue, where will the parents and fans park their cars to watch these games. These diamonds are heavily used in the spring and summer. I do not think that these other residents of the Highland Park area should be put at risk physically or mentally by this plan. The Planning Commission needs to rethink some of these issues. Thank you.

Eileen Mackin

Sent from [Mail](#) for Windows 10