ENVIRONMENTAL ASSESSMENT WORKSHEET FORM

July 2013 version

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

This EAW form is being used to conduct and document the scope of an Alternative Urban Areawide Review (AUAR) for a stadium and surrounding mixed-use development in St Paul, MN. An AUAR is an alternative to an Environmental Impact Statement (EIS) that responds to the questions on the EAW form to the level of analysis similar to an EIS. Minnesota Rules Chapter 4410.3610, subp. 4 states that "the content and format [of an AUAR document] must be similar to that of an EAW, but must provide for a level of analysis comparable to that of an EIS for impacts typical of urban residential, commercial warehousing, and light industrial development and associated infrastructure."

The twenty questions in the EAW form provide information about existing conditions, existing plans, potential issues to explore through the AUAR process, and specific methodologies for special studies that will be conducted for the AUAR (i.e., the scope of the Traffic Impact Study). The EAW and AUAR Guidelines provide additional details and resources for completing the EAW form for an AUAR and conducting the AUAR review process.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the document in the EQB Monitor.

1. Project title:

Minnesota United MLS Stadium and surrounding mixed-use urban village, 34.5 acre property bounded by Snelling, University, and St. Anthony Avenues and Pascal Street in Saint Paul's Midway area

2.	Proposer: MUSC Holdings, LLC	3.	RGU
	Contact person: William McGuire		Contact person: Josh Williams

Title: Chief Manager

Address: 90 S. 7th Street, Suite 5500 City, State, ZIP: Minneapolis, MN 55402

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Title: Senior Planner

Email: josh.williams@ci.stpaul.mn.us

4. Reason for EAW Preparation: (check one)

Required:	<u>Discretionary:</u>
X EIS (AUAR) Scoping	☐ Citizen pe i tion
☐ Mandatory EAW	☐ RGU discretion
	☐ Proposer initiated

If EAW or EIS is mandatory give EQB rule category subpart number(s) and name(s):

The preparation of this Scoping EAW is the first step in the compilation of a more in-depth study of the project via an AUAR.

The preparation of a scoping document similar to an EAW is mandatory under Minnesota Administrative Rule 4410.4300, Subpart 34: "Construction of a new sports or entertainment facility designed for or expected to accommodate a peak attendance of 5,000 or more persons." The City of St. Paul as the RGU has chosen to fulfill this requirement through the preparation of a Scoping EAW.

5. Project Location:

County: Ramsey

City/Township: St. Paul

PLS Location (1/4, 1/4, Section, Township, Range): NWSW342923 (NW 1/4 of SW 1/4 of Section 34 of Township 29N Range 23W)

Watershed (81 major watershed scale): Mississippi River Twin Cities (07010206), Capitol Region

Watershed District

GPS Coordinates: Approx. center of site is Latitude 44.98382 degrees North, Longitude

93.16400 degrees West

Tax Parcel Number: 342923320001, 342923320003, 342923320005, 342923320006, 342923320008,

342923320009, 342923320010

At a minimum attach each of the following to the EAW:

- County map showing the general location of the project See Figure 5-1
- U.S. Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries See Figure 5-2

Site plans showing all significant project and natural features. Pre-construction site plan and post-construction site plan.

See aerial photograph in Figure 5-3 depicting existing site conditions. The preparation of this scoping EAW is the first step in the compilation of a more in- depth study of the project via an AUAR. A site plan will be included in the Draft AUAR.

Figure 5-1: AUAR Area within Ramsey County

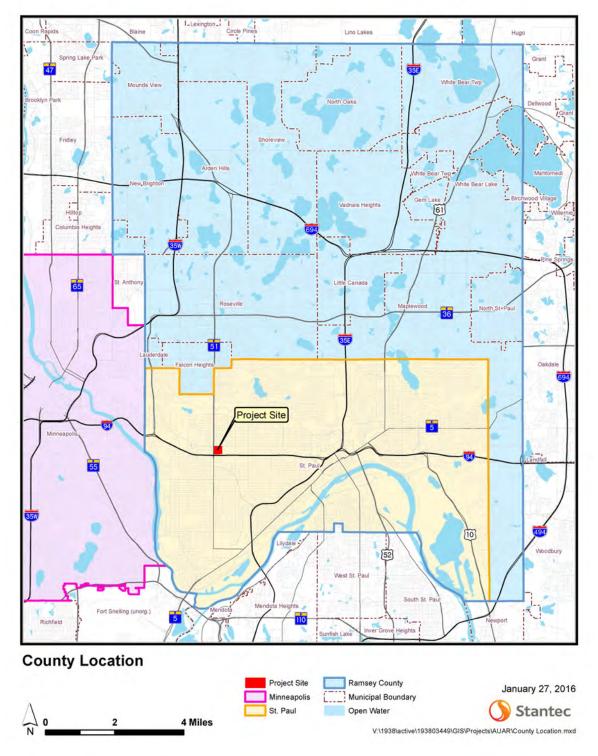


Figure 5-2: AUAR Area on USGS Map

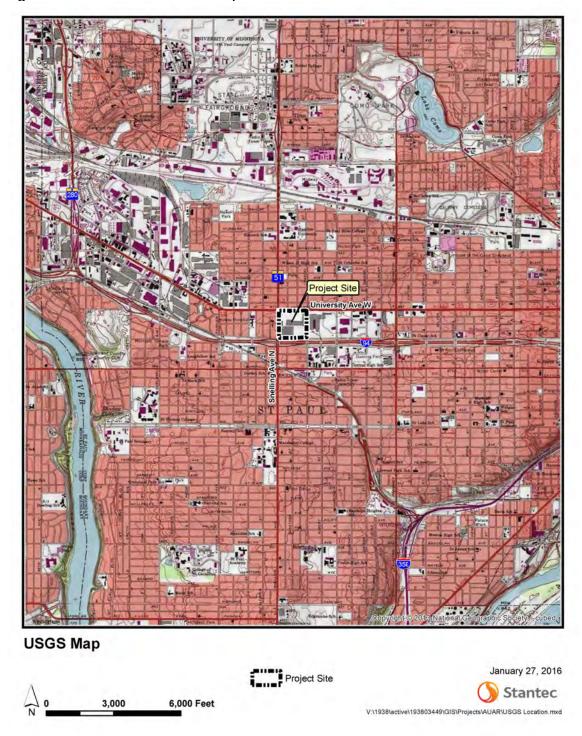
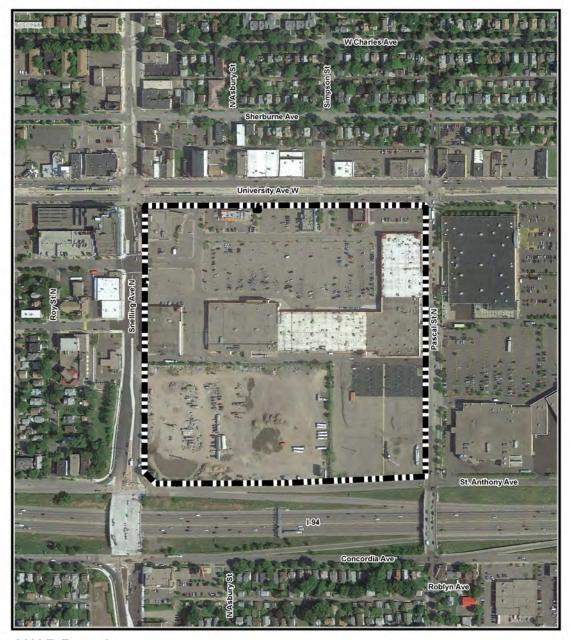


Figure 5-3: AUAR Area Boundary



AUAR Boundary



6. Project Description:

a. Provide the brief project summary to be published in the *EQB Monitor*, (approximately 50 words).

MUSC Holdings LLC (the proposer) proposes to build an 18,000 seat professional soccer stadium with expansion and standing room capacity to accommodate a maximum of 25,500 visitors (plus 500 employees) in the AUAR area. The remainder of the site will be redeveloped in a phased manner to accommodate a mixed-use development including retail and service commercial, hospitality, residential, office, potentially institutional uses and public and private open space.

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

MUSC Holdings LLC (the proposer) proposes to build an 18,000 seat stadium with expansion and standing room capacity to accommodate a maximum of 25,500 visitors (with 500 employees) in the AUAR area. The site will be used primarily as the home stadium for Minnesota United to host professional soccer games. The stadium will also potentially be used for college, high school and youth soccer games and other music and entertainment events. The remainder of the site will be redeveloped in a phased manner to accommodate a mixed-use development including retail and service commercial, hospitality, residential, office, potentially institutional uses and public and private open space.

Redevelopment of the site will likely result in a re-established street grid internal to the site, new/upgraded utilities to serve the site, and potential limited improvements to infrastructure in the immediate vicinity of the site. The preparation of this Scoping EAW is the first step in the compilation of a more in- depth study of the project via an AUAR. A discussion of specific infrastructure needs for the site will be included in the Draft AUAR.

- 1) At this time, construction and operation methods are undetermined.
- 2) There will be no modifications to existing equipment or industrial processes. Any and all existing equipment will be removed from the site and disposed of according to all applicable city, state and federal regulations.
- 3) Over a period of time to be determined by market demand existing structures will be demolished and replaced by new structures on the project site. All construction wastes will be removed and disposed of off-site according to all applicable city, state and federal regulations.
- 4) At this time, redevelopment of the subject AUAR site is estimated to be accomplished in multiple phases over 10-15 years, depending on market conditions.

c. Project magnitude:

Total Project Acreage	34.43 acres
Linear project length	n/a
Number and type of residential units	Multifamily housing units are proposed, adding residential uses to the site for the first time. Final counts are currently undecided, and will be incorporated in the final site plan.
Commercial building area (in square feet)	Office uses and supporting services, such as restaurants and retail, are planned for the development. Final square footage calculations will be incorporated in the final site plan.
Industrial building area (in square feet)	No industrial uses are planned for the AUAR area.
Entertainment building area (in square feet)	A stadium with 18,000 with expansion to 25,500 seats is planned for the AUAR area.
Other uses – specify (in square feet)	TBD - Comprehensive Plan anticipates and the Zoning Code requires a FAR of at least 1.0.
Structure height(s)	TBD - Comprehensive Plan authorizes the potential for 15 story towers or taller through the issuance of a conditional use permit.

d. Explain the project purpose; if the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

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

The AUAR area is strategically located half way between the central business districts of St. Paul and Minneapolis. With the Green Line LRT running along its northern boundary (University Avenue) and the A-Line BRT corridor (beginning service in 2016) running along its western boundary (Snelling Avenue), the site's location makes it both one of the highest priority TOD sites in the region and a top redevelopment opportunity site. A portion of the AUAR area, known as the "Bus Barn," has been under-utilized for several years. The adjacent shopping center, though economically viable, is under-developed and well positioned and planned to support higher-density uses. The City and region will benefit from realizing the TOD potential at this key site.

e.	Are future stages of this development including development on any other property planned or
	likely to happen? Yes x No
	If yes, briefly describe future stages, relationship to present project, timeline and plans for
	environmental review.
	The AUAR will analyze all future phases of the development. Development of the AUAR
	area is expected to be staged. The stadium will be initially built with 18,000 seats, but will be
	designed to expand to accommodate a maximum of 25,500 seats (served by 500
	employees). The adjacent mixed-use development will also be phased. For the purposes
	of this environmental review both the existing adopted Comprehensive Plan Scenario and
	the Stadium Build Scenario will be analyzed at full build out. A Mitigation Plan will be
	prepared identifying any thresholds of development activity that triggers the need for
	mitigation and commits the RGU and its projects partners to implement these mitigation
	steps. All of this analysis and the development of the Mitigation Plan will be completed
	through consultation with all of the key reviewing agencies and stakeholders.

- f. Is this project a subsequent stage of an earlier project? \(\subseteq \text{Yes x No} \)
 If yes, briefly describe the past development, timeline and any past environmental review.
- **7. Cover types:** Estimate the acreage of the site with each of the following cover types before and after development:

	Before	After		Before	After
Wetlands			Lawn/landscaping		
Deep			Impervious		
water/streams			surface		
Wooded/forest			Stormwater Pond		
Brush/Grassland			Other (describe)		
Cropland					
			TOTAL		

The AUAR area is approximately 34.5 acres of urban developed land. Based on aerial photographs and a review of the National Wetland Inventory and the National Hydrography Dataset, there are no surface water features present in the AUAR area. A narrow strip of unmaintained grasses, approximately five feet wide, is adjacent to the roads and sidewalks along the southwest portions of the property. In addition, isolated trees are present throughout the southwest portion of the property. The remainder of the property is impervious surface.

More detailed designs will be developed over the course of this environmental review, but early concepts anticipate the conversion of impervious surfaced areas to green space. Strong consideration is also being given to the construction and maintenance of innovative storm water management improvements throughout the plazas, open spaces and in complete street design concepts.

Detailed Analysis to be Described in Draft AUAR

Minnesota Land Cover Classification System (MLCCS) data¹ are unavailable for the AUAR area. In order to populate the table above (Cover Types), the existing acreage of land/landscaping, impervious surfaces, and above-ground development (e.g., buildings) in the AUAR area will be determined through GIS analysis of aerial photography. In addition, acreages of post-construction land cover types will be determined using GIS tools and analysis of a site plan design.

8. Permits and approvals required: List all known local, state and federal permits, approvals, certifications and financial assistance for the project. Include modifications of any existing permits, governmental review of plans and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing and infrastructure. All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules, Chapter 4410.3100.

A comprehensive list of transportation related permits and approvals will be developed during this environmental review. This work will be done with the assistance of a Technical Panel consisting of members of the Federal Highway Administration, MnDOT, the Metropolitan Council, Metro Transit, the Ramsey County Highway department and St. Paul Public Works.

A list of additional permits anticipated for this development is included in Table 8-1. No applications for any of these permits are currently underway.

Unit of government Type of application US Fish and Wildlife Consultation regarding Section 7 of the Endangered Species Service Act (only required if project is federally funded) Temporary Water Appropriation Permit for construction MnDNR dewatering **MPCA** Construction Site Stormwater Permit **MnDOT** Driveway Access Permit & Utility Permits MN Dept. of Health Water extension permit Sewer extension permit Sewer Permit to Connect Metropolitan Council The proposed development is consistent with the adopted Comprehensive Plan Alternative Urban Area Wide Review Approval of Master Plan Site Plan Review T4 Zoning Amendment City of St. Paul Preliminary Plat, **Development Agreements** Final Plat Sign Permit

Table 8-1 Anticipated Permit Requirements

¹ Minnesota Department of Natural Resources (MDNR). 2016. Minnesota Land Cover Classification System. http://dnr.state.mn.us/mlccs/index.html. Website accessed January 25, 2016.

	Building Permit		
	Excavation and Grading Permit		
	Certificate of occupancy		
	Parkland Dedication		
	Ordinance Permit for Construction of Public Improvements		
	Right of Way Excavation and Obstruction Permits		
St. Paul Regional Water Services	Plumbing permits		
Capitol Region	Watershed District Permit for stormwater management and for		
Watershed District	erosion and sediment control		

Cumulative potential effects may be considered and addressed in response to individual EAW Item Nos. 9-18, or the RGU can address all cumulative potential effects in response to EAW Item No. 19. If addressing cumulative effect under individual items, make sure to include information requested in EAW Item No. 19

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, prime or unique farmlands.

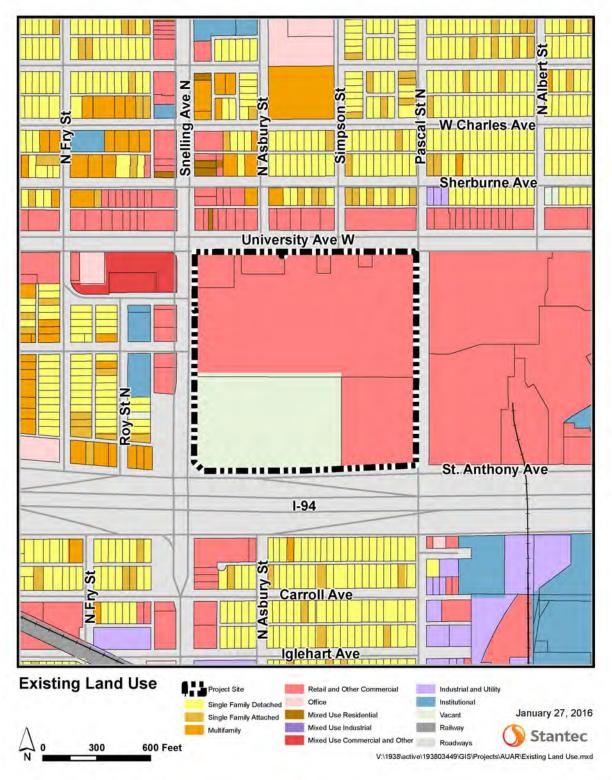
The AUAR area is currently home to the Midway Shopping Center and a vacant parcel formerly used as the Metro Transit Bus Barn facility (demolished in 2001) and for bus storage and construction staging during construction of the Green Line. The shopping center, considered a mixed commercial use, occupies the northern portion of the AUAR area and the former bus barn site occupies most of the southern portion of the AUAR area. A five-acre parcel with some surface parking, located immediately east of the former bus barn property, is also owned by the shopping center owners. The AUAR area is bordered by two major arterial roads, Snelling Avenue and University Avenue. Both are lined with other commercial and office uses. The southern side of the AUAR area is bordered by St. Anthony Ave., a westbound frontage road to Interstate 94. Commercial uses line Snelling and University Avenues opposite the site, giving way to mixed single-and multifamily residential neighborhoods beyond. The neighborhood to the south across St. Anthony Avenue, Interstate 94, and Concordia Avenue (the eastbound frontage road to Interstate 94) is primarily mixed residential with some commercial. A large shopping center is immediately east of the AUAR area along Pascal Street.

The nearest park is Hamline Park, located approximately one quarter mile north of the AUAR area on Snelling Avenue and Thomas Avenue. The park features a playground open space, and tennis and basketball courts.

No scenic or recreational trails exist near the site. However, there is an in-street separated lane bicycle facility along Pascal Street, and Charles Avenue is a designated bicycle boulevard (a shared-lane facility). The Saint Paul Bicycle Plan, adopted in 2015, also calls for an in-street separated lane facility bisecting the site along a future ROW line approximately aligned to Shields Avenue, which currently terminates west of the site There are no unique or prime farmlands within the AUAR area or nearby.

Figure 9-1 depicts the City of St. Paul area land use, as discussed above.

Figure 9-1: Existing Land Use



ii. Plans. Describe planned land use as identified in comprehensive plan (if available) and any other applicable plan for land use, water, or resources management by a local, regional, state, or federal agency.

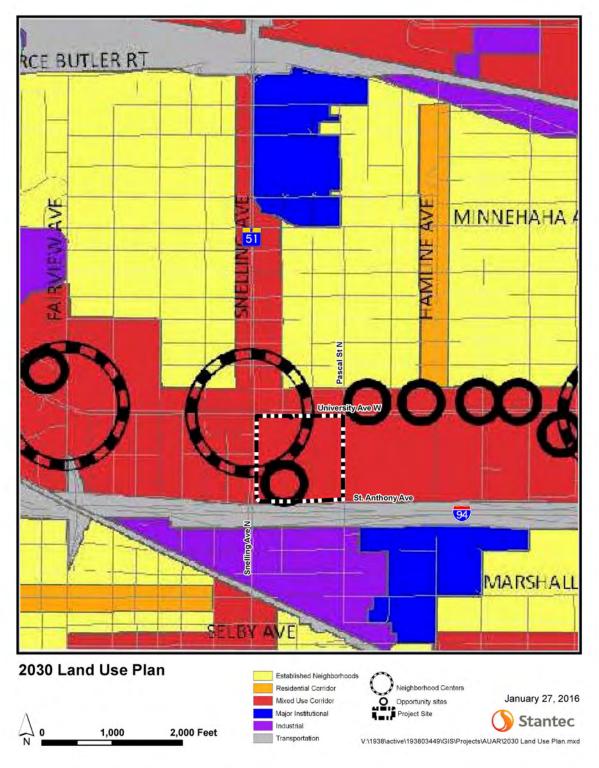
Comprehensive Plan: The City of St. Paul's 2010 Comprehensive Plan is divided into seven chapters, each addressing different policy areas. The land use chapter of the plan includes a future land use map which identifies future land use character areas, including density ranges, for the entire city. The Plan identifies the AUAR area and the adjacent University and Snelling Avenue corridors as Mixed Use Corridors and identifies the area around the intersection of Snelling and University Avenue as a Neighborhood Center. The Plan identifies these land use character areas as appropriate for a broad mix of uses at the highest densities allowed outside of the downtown core. Policies in the Plan call for these areas to accommodate growth, support transit use and walking, and provide diverse housing options a mix of commercial uses that support transit. The bus barn site, in the southern part of the AUAR area, is also identified in the Plan as an Opportunity Site for future redevelopment for mixed-use or as an employment center.

Snelling Station Area Plan: Prior to the construction of the Green Line along University Avenue, the City of St. Paul developed the Snelling Station Area Plan (SAP), which was adopted as an addendum to the Comprehensive Plan. The vision for the area includes future development that is mixed-use, walkable, sustainable, provides new open spaces, increases transit ridership, and serves as an economic catalyst. Development should be dense, with 4-6 base building heights and point towers up to fifteen stories. In regard to the AUAR area, the SAP calls for developing a land use strategy that focuses on connectivity, design, and transit and for increasing development intensity in the area. The SAP also recommends that south of University Avenue be transformed into a "new urban village" and Transit Oriented Development demonstration site, and generally indicates that entertainment-related uses are best located in the southern portion of the area The SAP also specifically identifies entertainment uses as a desired potential use for the bus barn site (p. 27, Policy 4.1.2 e).

Other relevant water and natural resources plans will be discussed in the response to the topic most closely related to the plan document.

Figure 9-2 depicts the City of St. Paul's Future Land Use guidance for the AUAR area.

Figure 9-2: Future Land Use

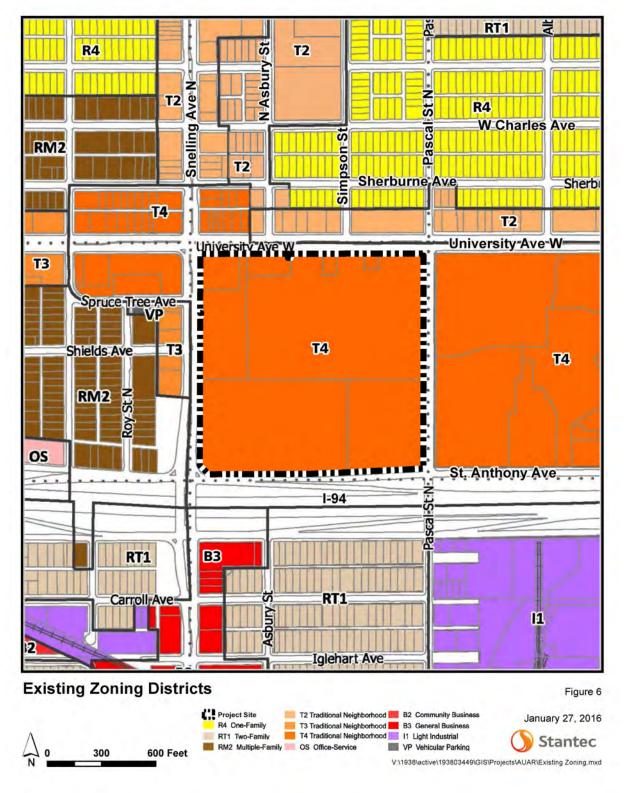


iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The AUAR area is currently zoned T4 Traditional Neighborhood. According to the City of St. Paul's zoning code, "traditional neighborhood districts are intended to foster the development and growth of compact, pedestrian-oriented urban villages." There are four traditional neighborhood districts, each ranging in intensity and size. T4 is the most intense district and allows for high density development, focused on major transit nodes. Principal uses in the district include multi-family residential, commercial, institutional, office, and retail. There are numerous design standards in the district which ensure a traditional urban character and diversity of uses. A full list of requirements for the district can be found in the City of St. Paul's Zoning Code §3.66.300. An amendment to the T4 use table is anticipated to clarify that a soccer stadium is a permitted use in the district.

There are no overlay districts in the AUAR area. Figure 9-3 depicts the City of St. Paul area zoning, as discussed above.

Figure 9-3: Existing Zoning



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

Detailed Analysis to be Described in Draft AUAR

The proposed project is consistent with the adopted Comprehensive Plan and is subject to all of the implementation measures incorporated into that Plan. The Draft AUAR will include a detailed analysis of all of the anticipated effects of the proposed development within its neighborhood, City and regional context.

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

Detailed Analysis to be Described in Draft AUAR

A Mitigation Plan will be prepared as part of the AUAR process. This Mitigation Plan will be prepared in consultation with the agencies and stakeholders with expertise in specific environmental issue areas. The AUAR analysis will identify threshold points in the development and occupancy of the Project area that cause adverse impact and will then identify and commit to mitigation measures to respond to and avoid these potential adverse effects.

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.

The following sources were consulted for this section: Ramsey County Geologic Atlas, MN Well Index, and the 2015 Braun Intertec Environmental and Geotechnical Review.

The AUAR area is underlain by unconsolidated glacial deposits of till and outwash. These deposits range from clayey sand to sandy silt to poorly sorted sand. The upper 2 to 20 feet of sediment across the AUAR area is comprised of fill as the result of previous construction activities at the site. The uppermost bedrock layer is the Decorah Shale, found at a depth of approximately 35-40 feet. The next lower bedrock unit, the carbonate Platteville Limestone, is found at a depth of approximately 125 feet from the land surface.

The water table is approximately 25-30 feet from the land surface, but a small, discontinuous perched zone of groundwater can be found at 10-12 feet below the land surface.

While carbonate bedrock is present and raises the possibility for karst conditions and sinkholes, the likelihood of karst conditions is relatively low because the carbonate bedrock is covered by 75-85 feet of shale. Additionally the water table is approximately 100 feet above the top of the carbonate bedrock. Karst conditions generally form when the surface of the water tables falls within a carbonate bedrock unit.

Detailed Analysis to be Described in Draft AUAR

The depth of carbonate bedrock is great enough that no further analysis of karst conditions, such as borings or geophysical analysis is anticipated in the Draft AUAR.

The Draft AUAR will further evaluate the presence of shallow perched groundwater and mitigation strategies such as dewatering during construction activities will be identified if applicable.

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 soils limitations, such as steep slopes, 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.

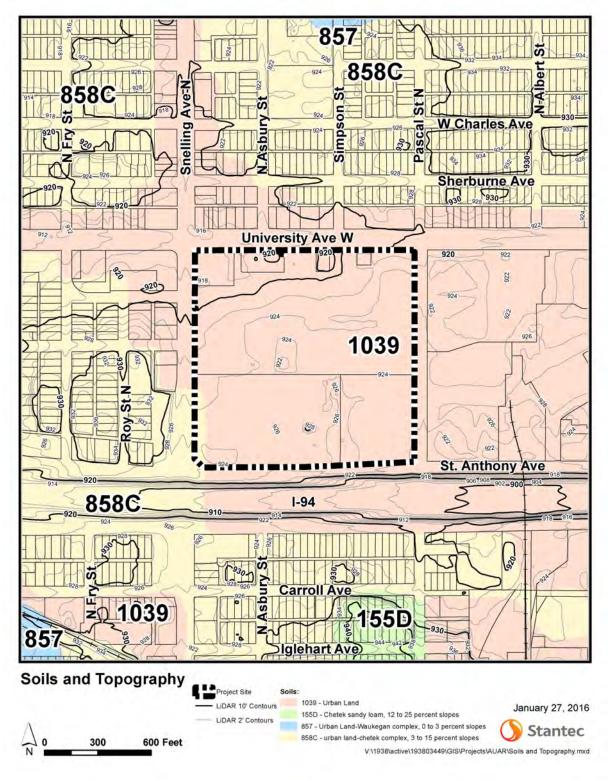
The Web Soil Survey classifies the entire AUAR area as "urban land" (classification code 1039). The December 2015 Braun Intertec Environmental and Geotechnical Review references test borings in the AUAR area indicating that the upper 2 to 20 feet from the land surface is comprised of man-made fill. Shallow slopes in the AUAR area result in a relatively low erosion potential (see Figure 10-1).

Detailed Analysis to be Described in Draft AUAR

The Draft AUAR will identify measures to protect soils from fill materials and construction debris and to mitigate erosion during excavation and construction of the site.

NOTE: For silica sand projects, the EAW must include a hydrogeologic investigation assessing the potential groundwater and surface water effects and geologic conditions that could create an increased risk of potentially significant effects on groundwater and surface water. Descriptions of water resources and potential effects from the project in EAW Item 11 must be consistent with the geology, soils and topography/land forms and potential effects described in EAW Item 10.

Figure 10-1: Soils and Topography



11. Water resources:

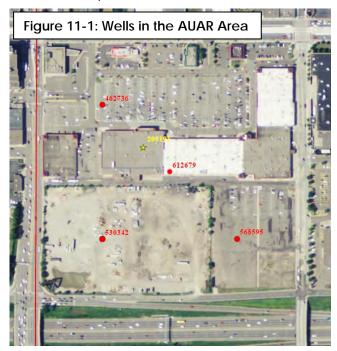
- a. Describe surface water and groundwater features on or near the site in a.i. and a.ii. below.
 - i. Surface water lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, trout stream/lake, wildlife lakes, migratory waterfowl 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 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.

The AUAR area is fully urbanized and does not contain any surface waters. No wetlands are indicated on National Wetland Inventory mapping, and no DNR Public Waters are identified.

ii. Groundwater – aquifers, springs, seeps. Include: 1) depth to groundwater; 2) if project is within a MDH wellhead protection area; 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 the water table across the AUAR area is generally 25-30 feet from the land surface. However, a discontinuous perched zone of groundwater can be found 10-12 feet below the land surface, as seen in test borings conducted by Braun Intertec and referenced in their December 2015 Environmental and Geotechnical Review.

The AUAR area is not within an existing wellhead protection area. The only well with a "verified" location on the project site is a well with the unique number 200191 and is attributed to "Murphys Department Store." The 16-inch diameter well was constructed in 1959 and was drilled to a depth of 521 feet, being completed in the Prairie du Chien and Jordan aquifers. The well is still listed as "active" in the Minnesota Well Index. However, wells are typically listed as active until information that says otherwise is reported to the State.



Four more wells with unverified locations in the AUAR area are identified on the Minnesota Well Index. Table 11-1 below lists the wells identified in the AUAR area:

Table 11-1

Unique	Well Name	Depth	Well Type	Aquifer	Status
Number		(ft)			
200191	Murphys Dept	521	Commercial	Prairie du Chien-	Active,
	Store			Jordan	Located
462736	Montgomery	43	Monitoring	Decorah Shale	Active,
	Ward				Unverified
530342	MW-1	24	Monitoring	Drift	Sealed,
					Abandoned
568595	Rein Midway Ltd	34	Monitoring	Drift	Active,
	Partnership				Unverified
612679	Development	30	Other	Drift	Active,
	Diversified				Unverified

Detailed Analysis to be Described in Draft AUAR

Analysis in the Draft AUAR will further investigate the status of the above-referenced wells. The owner of an unused, unsealed well is required by State Rule to have the well properly sealed by a licensed well contractor, to bring the well back into use, or to obtain an annual Unused Well Permit. The Draft AUAR will identify appropriate mitigation strategies to address inactive wells.

- b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects in Item b.i. through Item b.iv. below.
 - i. Wastewater For each of the following, describe the sources, quantities and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site.
 - 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.
 - 2) If the wastewater discharge is to a subsurface sewage treatment systems (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system.
 - 3) If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges.

Existing sanitary sewers to serve the AUAR area are located along Snelling Avenue and University Avenue. These will convey wastewater via City sewers to the Metropolitan Council interceptor system and eventually to the Metro Wastewater Treatment Plant. No land uses that would generate waste water requiring pretreatment are anticipated in the AUAR area.

Detailed Analysis to be Described in Draft AUAR

For the Draft AUAR, wastewater flows for the AUAR area will be estimated, and the existing City sanitary sewer system will be evaluated to determine if adequate capacity exists to convey the wastewater. Appropriate mitigation measures will be identified as needed.

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.

A large tree trench was constructed along University Avenue as part of the Green Line project to handle stormwater management for the public right-of-way along the corridor. Stormwater runoff from the AUAR area is directed via pipes and catch basins north to the University Avenue trunk storm system, or else west to Snelling Avenue or east to Pascal Street and then north to the University Avenue trunk storm system. The University Avenue trunk storm system is part of the City's municipal storm sewer system and discharges into the Mississippi River (Hydrologic Unit Code 07010206) without treatment.

Detailed Analysis to be Described in Draft AUAR

For the Draft AUAR, stormwater rates and volumes will be estimated for the AUAR area. Potential BMP locations to manage stormwater will be identified, and construction site stormwater management (e.g., erosion and sediment control) will also be addressed. The City of Saint Paul is currently leading a stakeholder process to develop preferred stormwater management approaches for the site, including potential future public right-of-way and open spaces. The results of this process will be incorporated into the AUAR evaluation.

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.

Construction dewatering may be required for the project; otherwise, no water appropriation is anticipated. Water supply for the site is provided by Saint Paul Regional Water Services, which relies primarily on surface water from the Mississippi River for its supply. Water mains to serve the AUAR area are located along Snelling Avenue, University Avenue, Pascal Street, and St. Anthony Avenue. However, preliminary review indicates that this existing infrastructure may be insufficient for the anticipated needs of the proposed structures. If so,

replacement of significant portions may be necessary. Additionally, existing private water main infrastructure exists within the project limits and will need to be cut off and abandoned, unless full removal is deemed necessary.

Detailed Analysis to be Described in Draft AUAR

For the Draft AUAR, water demands for the site will be estimated, and the existing City water system will be evaluated to determine if adequate capacity exists to meet the water demand. Mitigation measures will be identified as needed. These could include infrastructure upgrades, conservation measures, and alternative practices such as stormwater reuse for irrigation.

iv. Surface Waters

a) 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.

No wetlands have been identified in the AUAR area.

b) 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.

No surface water features have been identified in the AUAR 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 ground water 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.

An Environmental Review Report prepared by Braun Intertec in December 2015 describes the following conditions on the site:

Starting in the 1940s and until the early 2000s, the southern half of the Site was used for a bus garage/maintenance shop that included inspection pits, hydraulic lifts, parts storage bus washing and parking. The northern half of the Site was used as a foundry and machine shop from the early 1900 to 1950s and commercial property (Midway Mall) from the 1960s to present. Two areas of underground storage tanks (USTs), used for the storage of petroleum products, were located on the southwestern portion of the Site. Releases from the two UST areas were reported, investigated and remediated with closure letters issued by the Minnesota Pollution Control Agency (MPCA). A dry cleaning facility operated on the northern half of the Site (Midway Mall) and volatile organic compounds were detected in soil and groundwater. A groundwater remedial system operated at the dry cleaning site from 1999 to 2011. Residual contamination associated with the USTs and dry cleaners is thought to remain and may present a threat to soil, groundwater or soil vapor.

In March 2016, the site will be entered into the MPCA's Voluntary Investigation and Cleanup Program (VIC) and Petroleum Brownfields Program (PBP) for oversight of remediation planning and Response Action Plan (RAP) Implementation during construction of the stadium and related improvements. Phase 1 and Phase 2 assessments are currently being conducted to support the development of a Response Action Plan for submission to MPCA by March 18th for their review and approval by May 2. Contamination cleanup grants will be sought from MN Dept. of Employment and Economic Development and other funders. It is anticipated that No Association Determinations will be secured prior to construction and the RAP will be implemented at the time of construction. MPCA environmental liability assurances (Certificate of Completion, No Action, or No Further Action) will be sought post RAP implementation and post approval by the MPCA of the RAP Implementation Report.

Detailed Analysis to be Described in Draft AUAR

The Draft AUAR will review any relevant documents produced as part of the ongoing Phase I and Phase 2 investigations or pursuant to the enrollment of the subject properties in the VIC and PBP programs. Potential hazards from site demolition and construction activities will be identified. Mitigation strategies consistent with state and federal laws will be identified as appropriate.

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.

<u>Detailed Analysis to be Described in Draft AUAR</u>

The Draft AUAR will identify any project related generation and storage of solid wastes as well as requirements for storing and disposing of the materials in accordance with state and federal laws.

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 spill or release 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.

<u>Detailed Analysis to be Described in Draft AUAR</u>

The Draft AUAR will identify any project related use and storage of hazardous materials as well as requirements for using and storing materials in accordance with state and federal laws.

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 waste including source reduction and recycling.

<u>Detailed Analysis to be Described in Draft AUAR</u>

The Draft AUAR will identify any project related generation and storage of hazardous wastes as well as requirements for generating and storing materials in accordance with state and federal laws.

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 in near the site.

The AUAR area is 34.43 acres of urban developed land. Review of aerial photographs and the National Wetland Inventory and the National Hydrography Dataset indicates there are no surface water features present in the AUAR area. Due to the lack of wetlands or surface waters present, the AUAR area does not contain suitable habitat for aquatic species.

A narrow strip of unmaintained grasses, approximately five feet wide, is adjacent to the roads and sidewalks along the southwest portions of the property. In addition, isolated trees are present throughout the southwest portion of the property.

Detailed Analysis to be Described in Draft AUAR

Minnesota Land Cover Classification System (MLCCS) data² are unavailable for the AUAR area. Using historic and recent aerial photography and site photographs, an assessment will be undertaken to determine whether potential suitable habitat for wildlife, threatened and endangered species, rare features and ecosystems are present in the AUAR area and whether these species may be impacted by proposed development.

ial concern) species
siodiversity
roximity to the site.
number (ERDB

² Minnesota Department of Natural Resources (MDNR). 2016. Minnesota Land Cover Classification System. http://dnr.state.mn.us/mlccs/index.html. Website accessed January 25, 2016.

______) 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 the results.

Per a review of the U.S. Fish and Wildlife Service's (USFWS's) Endangered Species website³, there are four federally listed species with a geographic range including Ramsey County:

- Higgins eye pearlymussel (Lampsilis higginsii) Endangered
- Northern long-eared bat (Myotis septentrionalis) Threatened
- Snuffbox (Epioblasma triquetra) Endangered
- Winged mapleleaf (Quadrula fragosa) Engangered

Detailed Analysis to be Described in Draft AUAR

Due to the lack of wetlands or surface waters present and urban development in the AUAR area, further investigation or an assessment of potential impacts to any of these federally listed species is not anticipated.

Based upon a review of the Minnesota Department of Natural Resources (MDNR) Natural Heritage Information System (NHIS) under license agreement LA-760, there are no known records of state-listed species within the AUAR area. However, the review indicated one known species record within the project vicinity:

• Western Foxsnake (*Pantherophis ramspotti*) – One known record of this species, observed in October 1939, is located near the intersection of University Avenue and Snelling Avenue. This species does not have special status in Minnesota. Due to the historic date of this record and the urban development in the AUAR area, it is not anticipated that further investigation or an assessment of potential impacts to this species is warranted.

In addition, an analysis of Minnesota Biological Survey (MBS) data, there are no mapped high quality plant communities or MDNR-mapped Sites of Biodiversity Significance within the AUAR area or the immediate vicinity. A desktop review of the MDNR's Regionally Significant Ecological Areas map (2003) indicates that no portions of the AUAR area have been mapped as areas of ecological biodiversity.

Detailed Analysis to be Described in Draft AUAR

Protected species surveys within the AUAR area are not anticipated due to lack of high quality plant communities.

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.

³ United States Fish and Wildlife Service (USFWS). 2016. County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species. http://www.fws.gov/midwest/endangered/lists/minnesot-cty.html. Website accessed January 27, 2016.

Because the entire AUAR area is urban developed land, potential impacts to aquatic species, threatened and endangered species, plant communities, and rare features and ecosystems are not anticipated.

<u>Detailed Analysis to be Described in Draft AUAR</u>

In order to evaluate the impacts of the proposed project on birds and wildlife, the proposer will determine the potential acreage of pre- and post-construction impervious surface and land cover types. Using this analysis and evaluating the site for suitable habitat based on a comprehensive desktop assessment (i.e., aerial photographs and publicly available information), the proposer will evaluate the project's potential to impact birds and wildlife.

Construction activities that involve soil disturbance can result in the introduction and spread of invasive species. The proposer will identify any permit requirements related to noxious weeds and invasive species management and will provide a discussion of industry best management practices during construction and operation within the AUAR.

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

<u>Detailed Analysis to be Described in Draft AUAR</u>

Upon comparison of the pre- and post-construction land cover assessment within the AUAR area, the proposer will identify the scope of potential development impacts and measures that avoid, minimize, or mitigate adverse effects to birds and wildlife. No impacts to fish, threatened or endangered species, plant communities, or sensitive ecological resources are anticipated for the proposed development.

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 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.

The AUAR area and surrounding neighborhoods have been fully developed for decades. Based on a review of Sanborn Insurance Maps, from at least the year 1925, and possibly as early as 1903, the entire AUAR area was in use for operations by the Twinc City Rapid Transport Co., a streetcar operator. Operations included construction and maintenance of street cars, and structures on the site included a paint shop, machine shop, foundry, blacksmith shop, pipe shop, and warehouses and offices.

The northern part of the AUAR area is the current location of the Midway Center, an autooriented mall which was built in 1954. The southern part of the AUAR area is the former location of the Metro Transit Bus Barn Facility., built in 1954. Some of the original buildings on the site may have remained past 1954. The bus barn was demolished in 2001.

<u>Detailed Analysis to be Described in Draft AUAR</u>

A thorough review of historic maps and documents and consultation with SHPO will be initiated to determine whether or not any historic features in or adjacent to the AUAR area

exist and merit surveying. In the event that historic features are identified in or adjacent to the AUAR area, mitigation strategies will be developed and a formal review by SHPO will be initiated.

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.

The AUAR area is located in a fully developed, urban, commercial area of St. Paul. The AUAR area is currently occupied by a shopping mall, large surface parking lot and vacant bus barn site, none of which provide scenic views to neighboring properties. There are no nearby scenic views or vistas around the AUAR area. The AUAR area is bordered by Interstate 94 on the south, limiting views of future development from the south. Nearby residential neighborhoods are located south of I-94, west of Snelling Avenue and north of University Avenue. All immediate neighboring properties are commercial in use.

<u>Detailed Analysis to be Described in Draft AUAR</u>

The Draft AUAR will analyze at least two possible scenarios: one which maintains the high density, mixed-use development as suggested by the comprehensive plan, and one which will include a stadium. Preliminary designs for the stadium call for it to be built into the ground and include a lower profile than many of the region's major sports stadia. Stadium lights will be down cast and angled to prevent off site glare. The Draft AUAR will incorporate information from site designers and architects about the location and intensity of these lights. The Draft AUAR will also provide mitigation strategies for all development scenarios.

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 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.

Detailed Analysis to be Described in Draft AUAR

Detailed analysis of the development scenarios will determine the likelihood for stationary source emissions.

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.

Detailed Analysis to be Described in Draft AUAR

A vehicle related air emission analysis will be completed based on discussions with MnDOT and MPCA.

CO Hot Spot Analysis

- The Twin Cities metropolitan area is currently classified as a "limited maintenance" air quality area that meets state and federal requirements.
 However, in the past, it was considered a "Non-Attainment" area as a result of carbon monoxide measurements that exceeded state and federal standards near the AUAR area. Therefore, any projects influencing this area should be completing an updated air quality analysis.
- MnDOT, MPCA and EPA require analysis if a project influences one of their Top 10 identified intersections based on historical CO monitoring and traffic volumes.
 The intersections of Snelling Avenue / University Avenue and Lexington Avenue / University Avenue are two of these intersections and will require analysis. Analysis would also include the signalized intersections at Snelling Avenue / I-94 ramps due to potential congestion.
- CO emissions rates will be developed using MOVES2014 for Ramsey County vehicle fleet and intersections modeled in CAL3QHC for dispersion analysis.
- The scenarios to be considered include full development scenario (include all residential/commercial development, but not event traffic); Game day scenario (include additional traffic generated by stadium event); Construction conditions (consider any traffic impacts from site construction);
- CO conformity not required due to 2010 Limited Maintenance Plan
- MSAT Analysis will include be a qualitative assessment which should be adequate assuming new capacity is not proposed along I-94 with this project.
- Carbon Monoxide dispersion analysis will also be conducted for vehicles in parking areas on the site during game day conditions.
- Resulting Carbon Monoxide concentrations will be added to background concentrations and intersection model concentrations for evaluation of worstcase scenario. Additional "sensitive receptors" will be considered in potential locations where residential development is proposed on the site.
- 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.

Detailed Analysis to be Described in Draft AUAR

Dust and odors may be of concern during all phases of construction. The Draft AUAR will document City Ordinances and Codes pertaining to dust and odors and mitigation strategies for the AUAR area will be developed.

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.

Detailed Analysis to be Described in Draft AUAR

Vehicular traffic noise associated with increased traffic volumes within the AUAR area will be the primary continuous noise impact from this development. A noise analysis will be completed for traffic to address the questions identified in EAW/AUAR Item 17 "Noise". All traffic noise modeling to be completed using MINNOISEV31 (FHWA Stamina model adapted by MnDOT for use in Minnesota).

The work will include:

- Meet with MPCA staff to discuss traffic noise analysis methodology.
- Perform daytime noise monitoring at three locations on the project site. Locations to be determined in consultation with the City, consultant and property owners.
- Gather relevant traffic data from existing sources (hourly traffic volumes by vehicle classification) and prepare worst noise hour analysis following MnDOT guidance. Identification of worst noise hour to be based on three representative receptor locations used for field measurements.
- Develop existing conditions noise model input file and perform noise model validation (comparison of existing conditions results to field measurements).
- Develop build conditions noise model input file. Model traffic noise levels at proposed outdoor use locations on project site and compare to State daytime and nighttime noise standards. Prepare analysis of noise barriers following MnDOT guidance. Identify other strategies to minimize traffic noise impacts at the project site.
- Prepare draft traffic noise memorandum for City review. Revise as per City comments. Prepare final memo for use by the City, and its partners, in the AUAR.

The addition of a stadium may also increase noise levels at the AUAR area during events (crowds, loud speakers, etc.). The Draft AUAR will discuss the potential impacts of this noise source.

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) indicate source of trip generation rates used in the estimates, and 5) availability of transit and/or other alternative transportation modes.
- 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,
- c. Identify measures that will be taken to minimize or mitigate project related transportation effects.

The City of Saint Paul will be working with a consulting firm with transportation experience at TCF Bank Stadium, Mall of America Field and Target Field. The City and consultant will be having bi-monthly meetings with other agencies that operate the transportation system including Metro Transit, Ramsey County, MnDOT and FHWA. Meetings will also be

held with the project proposers and property owners (Minnesota United, RK Midway and Metro Transit) to share transportation related information with them.

Task 1 - Data Collection

Data will be collected at the key intersections surrounded by Snelling Avenue, University Avenue, Selby Avenue and Lexington Avenue. The key intersections will be agreed to by the transportation agencies and the city.

Task 2 – Transportation Analysis Input Assumptions

Complete trip generation, direction of approach and modal choice (walk, bike, bus, LRT and vehicle) for the proposed development (Comprehensive Plan and Master Plan/Stadium Build scenarios) and the Stadium Events. These assumptions will be reviewed by the transportation agencies. These assumptions will be established using actual data, Metro Council's Regional Travel Demand Model, ticket information and other sound planning and engineering practices.

Task 3 – Traffic Analysis

Traffic analysis will be completed for the key intersections and the various Build scenarios. The Build scenarios will be compared to No Build conditions. Traffic volumes will be developed for 22 scenarios and traffic analysis completed for the 14 worse-case scenarios. Additional scenarios will include mitigation strategies to address any issues. Scenarios include the year of opening for the stadium and full-build of the development for land uses in the City's Comprehensive Plan and Master Plan.

Task 4 – Transportation Analysis

A more detailed analysis of all the modes (pedestrians, bikes, buses, LRT and vehicles) will be completed for three scenarios. This detailed modeling will assist with space requirements for staging transit for capacity events at the stadium or other conditions as determined by the worse-case scenarios and in cooperation with the transportation agencies and the city. The modeling will identify bottleneck areas, other transportation related issues and assist with development of mitigation strategies for all modes of travel.

Task 5 – Agency Meetings

Fifteen meetings are planned with the transportation agencies. These meeting will be held every two weeks from the end of January thru April and monthly from May to July. These will provide opportunities to share information between the agencies, city and property owners.

Task 6 – Site Layout Review and Coordination

The transportation agencies, city and consultant will work with the proposer and Metro Transit on several site elements. These include access driveway locations, traffic control, internal roadways, pedestrian and bicycle facilities, access to transit and parking locations.

Task 7 – Documentation and Mitigation Strategies

This transportation work will be summarized in a document. Mitigation strategies will be identified which could include development of a transportation management plan, parking strategies, shuttle service for events, pedestrian and bicycle accommodations,

transit staging areas, street closures for events, intersection improvements, traffic control modifications, site access, etc.

The transportation study will be an appendix to the AUAR.

- Cumulative potential effects: (Preparers can leave this item blank if cumulative potential effects are addressed under the applicable EAW Items)
 - Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.
 - 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.
 - 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.

Detailed Analysis to be Described in Draft AUAR

The Draft AUAR will identify reasonably foreseeable future projects that may interact with environmental effects of the proposed projects based on development applications and infrastructure projects in surrounding communities. Based on the analysis, geography and timeframes, the nature of the cumulative potential effects will be summarized and necessary mitigation will be identified.

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

RGU CERTIFICATION. (The Environmental Quality Board will only accept SIGNED Environmental Assessment Worksheets for public notice in the EQB Monitor.)

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The EAW describes the complete project; there are no other projects, stages or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively.

Copies of this EAW are being sent to the entire EQB distribution list.

Signature All Tollins	Date	February 15, 20	16
Title Director, Planning & Economic		/	
of Sannt Paul			