Date: 15 April, 2016

Reference: Summary of Comments Received on the Minnesota United MLS Stadium and Mixed-Use Urban Village Scoping Environmental Assessment Worksheet

From: Jonathan Sage-Martinson, Director, Saint Paul Department of Planning and Economic

To: Commenting agencies, commenting individuals, and interested parties

The Environmental Assessment Worksheet (EAW) published February 22, 2016 was intended to serve as a scoping document for an Alternative Area-wide Review covering a 34 acre property at the southeast quadrant of Snelling and University Avenues in Saint Paul, Minnesota.

In addition to providing information and seeking input related to the proposed project, this scoping document was intended to set the boundaries of the AUAR and identify the development scenarios to be analyzed through the review. The two scenarios include Scenario 1 which is full buildout of the site consistent with the existing adopted Comprehensive Plan, and Scenario 2, which includes a stadium with a maximum of 25,500 seats and full build-out of the remainder of the site. Details on the massing and land use mix proposed under each development scenario will be included in the Draft AUAR.

In November of 2015, the City of Saint Paul, as the Responsible Governmental Unit, formed a Technical Advisory Committee (TAC) of city staff and staff from partner agencies to coordinate the environmental review process and subsequent reviews of the project by permitting agencies. Recognizing that transportation systems and needs in an urban area are complex, the City of Saint Paul also convened a sub-committee of the TAC to gather additional input on the transportation analysis prepared as part of this environmental review. In addition to the TAC, the City of St. Paul has also invited a Citizens Advisory Committee to provide input on the proposed project. This group first convened at an open house in November 2015 and will continue to meet throughout the environmental review period.

Five agencies and one citizen provided comments on the Scoping EAW during the 30-day public comment period. The following agencies provided comments:

- Minnesota Pollution Control Agency
- Minnesota Department of Natural Resources
• Minnesota Department of Transportation
• Metropolitan Council
• State Historic Preservation Office

Comments received by these agencies and the citizen are summarized below, and a compilation of all comments received is attached to this memorandum. None of these comments suggested alternative development scenarios to the two described above and in the Scoping EAW. Therefore, the Draft AUAR will analyze these same two scenarios. Each of the comments to the Scoping EAW will be addressed in the Draft AUAR. Where necessary, stakeholder agencies will be consulted during preparation of the Draft AUAR to confirm the methodology and approach for any of the analysis requested through these comments.

SITE DESIGN
• Identify whether the Proposer is attempting to achieve LEED standards, especially for the stadium (DNR).
• Review standards for developing bird-safe buildings (DNR).
• We recommend the Proposer use native plants for landscaping. Trees may assist in buffering noisy areas (DNR).
• The EAW discusses a mix of office commercial and residential use. Details describing the size or massing of such uses for the site should be included in the AUAR (Met Council).

WATER
• Discuss potential and alternatives for installation of comprehensive water conservation features into project design, e.g. rainwater harvesting (DNR).

HAZARDOUS MATERIALS
• Demolition activities must comply with state and federal regulations requiring inspection for hazardous materials. Regulated asbestos-containing materials must be abated prior to demolition activities. MPCA notes specific permitting requirements and guidelines for asbestos and lead-based paint removal. Recycling of existing materials is recommended (MPCA).

NOISE
• The AUAR will need to consider noise, particularly stadium crowds/loudspeakers, in accordance with the state noise standard. It should include the same level of analysis for stadium noise as traffic noise. Nighttime noise standards are more stringent (MPCA).
• Why is your study only at the midway center property? When are you going to address the surrounding neighborhoods that will be inundated with light and noise pollution? What are you going to do about games, concerts, etc., that don't end [until] the wee hours of the morning? (individual commenter)

TRANSPORTATION
• MPCA recommends the proposer, their traffic consultant, and the RGU meet with MPCA prior to development of the Draft AUAR to discuss transportation-related impacts and traffic mitigation strategies (MPCA).
• Work with MnDOT to develop a successful Snelling Avenue layout, including detailed plan review (MNDOT).
• The project will likely require upgrades to sidewalks and curb ramps. Please continue to keep MnDOT informed to ensure ADA compliance (MNDOT).
• Changes to the TAZ forecast will be needed to update forecasted households and jobs in TAZ #1913 according to proposed development. The City can update the forecast through correspondence to the Met Council (Met Council).

CULTURAL RESOURCES
• Recommend that an assessment of the archeological potential for the project area be completed (SHPO).
• Completion of a literature review to ensure the survey results from the Green Line LRT project meet current standards for historic property identification and evaluation, for both history/architecture resources and archaeological resources (SHPO).
• In particular, Midway Center Shopping Mall meets the minimum age requirement for listing in the NRHP (SHPO).
• If the project is considered for federal assistance or requires a federal license or permit, additional review in conformance with Section 106 of the National Historic Preservation Act and 36CFR800 is needed (SHPO).