

Attachment A

Comments Received

From: nrose34021@aol.com
To: [Jennifer Monson](#)
Cc: donwon19@hotmail.com
Subject: Sherman EAW
Date: Thursday, August 5, 2021 1:48:46 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jennifer, I note a technical error in Table 5, page 12 of the EAW. Bass Lake in St. Louis Park is number 270015.

The Bass Lake numbered 270098 is located in the City of Plymouth, MN.

Nancy Rose



Friends of Bass Lake - Board of Directors

Don Weirens – President
Nancy Rose – Vice President
John Snyder – Treasurer
Susan Sackrison – Secretary

Adam Maier
Joelyn Malone
Elisabeth White
Doug White

To: Jennifer Monson, City of St. Louis Park
From: Friends of Bass Lake
re: Sherman development EAW

Dear Jennifer,

Thanks for providing directions to the EAW for the Belt Line Development project.

We would like to know about the climate consequences that the project will create. The existing law governing environmental review requires that a project's climate impacts be considered and the need for inclusion of that data has been upheld in legal actions.

The report guideline utilized in the Beltline project review is not specific about climate data required, but the Environmental Quality Board is now updating that form to specify how those impacts are quantified and reported. That proposed format could be a guide to adding climate effects for this EAW.

We request that the EAW be expanded to include several proposed sections:

- 7. Climate Adaptation and Resilience
- 8. Cover type
- 18. Greenhouse gas emissions / carbon footprint

Council actions that may be counter to St. Louis Park's Climate goals should be known and evaluated before they are approved.

Don Weirens, President
3401 Huntington Avenue South
Saint Louis Park, MN 55416
763-354-8325 donwon19@hotmail.com

www.FriendsofBassLake.com





MINNESOTA

ENVIRONMENTAL QUALITY BOARD

Date: July 21, 2021

To: Environmental Review Implementation Subcommittee

From: Interagency Climate Technical Team
Environmental Quality Board

Department of Agriculture
Department of Commerce
Department of Health
Department of Natural Resources
Pollution Control Agency
Department of Transportation

Metropolitan Council

Denise Wilson, Katrina Hapka, Erik Cedarleaf Dahl,
Giuseppe Tumminello
Stephan Roos
Louise Miltich
James Kelly, Kristin Raab, and David Bell
Kate Fairman
Melissa Kuskie, Peter Ciborowski, Laura Millberg
Deb Moynihan, Peter Wasko, Jeff Meeks,
Katherine Lind
Eric Wojchik

RE: Final recommendations for integrating climate related information into Minnesota Environmental Policy Act Program requirements

At the December 2020 Environmental Review Implementation Subcommittee (ERIS) meeting, the Interagency Climate Technical Team (ICTT) presented draft recommendations for integrating climate related information into Minnesota Environmental Policy Act Program. Since then, ICTT members have been working to get feedback from anyone impacted by the draft recommendations.

This memo offers an overview of the engagement process, summarizes feedback received and provides a summary of the technical assessment of the draft recommendations. In addition, the memo discusses changes ICTT made to the draft recommendations and presents ICTT's final recommendations. Attached to the memo are:

- A summary of the project background and timeline (Appendix A)
- • Draft, revised EAW form (Appendix B)
- Guidance documents (Appendix C)
- A technical analysis of the draft recommendations (Appendix D)

Engagement and feedback overview

The ICCT began their work in December 2019 with a public listening session and concluded with an extensive engagement process on the draft recommendations for Environmental Review Program changes presented to ERIS members. From January through May of 2021, ICTT members offered multiple opportunities for anyone interested in providing feedback on the draft recommendations to submit comments.

Environmental Quality Board (EQB) staff engaged Barr Engineering to assist with carrying out the engagement efforts and to apply their Environmental Review Program experience and technical

7. Climate Adaptation and Resilience:

- a. Describe the climate trends in the general location of the project (see guidance: *Climate Adaptation and Resilience*) and how climate change is anticipated to affect that location during the life of the project.
- b. For each Resource Category in the table below: Describe how the project's proposed activities and how the project's design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.

Resource Category	Climate Considerations (example text provided below is to be replaced with project-specific information)	Project Information	Adaptations
Project Design	For example, aspects of the building architecture/materials choices and site design that may negatively affect urban heat island conditions in the area considering changing climate zones, temperature trends, and potential for extended heat waves	Climate change risks and vulnerabilities identified include:	
Land Use	For example, any critical facilities (i.e. facilities necessary for public health and safety, those storing hazardous materials, or those with housing occupants who may be insufficiently mobile) that are proposed in floodplain areas and other areas identified as at risk for localized flooding; describe the risk potential considering changing precipitation and event intensity	Climate change risks and vulnerabilities identified include:	
Water Resources	Address in item 12	Address in item 12	Address in item 12
Contamination/ Hazardous Materials/Wastes	For example, how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the potential environmental effects of generation/use/storage of	Climate change risks and vulnerabilities identified include:	

Resource Category	Climate Considerations (example text provided below is to be replaced with project-specific information)	Project Information	Adaptations
	hazardous waste and materials		
Fish, wildlife, plant communities, and sensitive ecological resources (rare features)	Address in item 14.	Address in item 14.	Address in item 14.

8. **Cover types:** Estimate the acreage of the site with each of the following cover types before and after development:

Cover Types	Before (acres)	After (acres)
Wetlands and shallow lakes (<2 meters deep)		
Deep lakes (>2 meters deep)		
Wooded/forest		
Rivers and streams		
Brush/Grassland		
Cropland		
Livestock rangeland/pastureland		
Lawn/landscaping		
<u>Green infrastructure TOTAL (from table below*)</u>		
Impervious surface		
Stormwater Pond (wet sedimentation basin)		
Other (describe)		
TOTAL		

<u>Green Infrastructure*</u>	<u>Before (acreage)</u>	<u>After (acreage)</u>
<u>Constructed infiltration systems (infiltration basins/infiltration trenches/ rainwater gardens/bioretention areas without underdrains/swales with impermeable check dams)</u>		
<u>Constructed tree trenches and tree boxes</u>		

<u>Constructed wetlands</u>		
<u>Constructed green roofs</u>		
<u>Constructed permeable pavements</u>		
<u>Other (describe)</u>		
<u>TOTAL*</u>		

<u>Trees</u>	<u>Percent</u>	<u>Number</u>
<u>Percent tree canopy removed or number of mature trees removed during development</u>		
<u>Number of new trees planted</u>		

9. 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.*

Unit of Government	Type of Application	Status

Cumulative potential effects may be considered and addressed in response to individual EAW Item Nos. **19-1810-20**, or the RGU can address all cumulative potential effects in response to EAW Item No. **1922**. If addressing cumulative effect under individual items, make sure to include information requested in EAW Item No. **1921**.

10. Land use:

a. Describe:

- i. Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, prime or unique farmlands.
- 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.
- iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

17. 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. 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.
- 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.
- 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 17a). 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.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

- a. GHG Quantification: For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.

The following tables are examples; other layouts are acceptable for providing GHG quantification results

Construction Emissions

Scope	Type of Emission	Emission Sub-type	Project-related CO ₂ e Emissions (tons/year)	Calculation method(s)
Scope 1	Combustion	Mobile Equipment		
Scope 1	Land Use	Conversion		
Scope 1	Land Use	Carbon Sink		
TOTAL				

Operational Emissions

Scope	Type of Emission	Emission Sub-type	Existing facility CO ₂ e Emissions (tons/year)	Project-related CO ₂ e Emissions (tons/year)	Total CO ₂ e Emissions (tons/year)	Calculation method(s)
Scope 1	Combustion	Mobile Equipment				

Scope	Type of Emission	Emission Sub-type	Existing facility CO ₂ e Emissions (tons/year)	Project-related CO ₂ e Emissions (tons/year)	Total CO ₂ e Emissions (tons/year)	Calculation method(s)
Scope 1	Combustion	Stationary Equipment				
Scope 1	Combustion	Area				
Scope 1	Non-Combustion	Stationary Equipment				
Scope 1	Land Use	Carbon Sink				
Scope 2	Off-site Electricity	Grid-based				
Scope 2	Off-site Steam Production	Not applicable				
Scope 3	Off-site Waste Management	Area				
TOTAL						

b. GHG Assessment

- i. Describe and quantify reductions from planned mitigation, if proposed for the project's GHG emissions.
- ii. Quantify the proposed projects predicted net lifetime GHG emissions (total tons/#of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.

19. 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.

20. 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,



700 West Linden Ave
PO Box 1165
Minneapolis, MN 55440-1165

June 30, 2021

Jennifer Monson, AICP
Senior Planner
5005 Minnetonka BLVD
St. Louis Park, MN 55416
952-928-2841

RE: Proposed Beltline Station Development EAW Distribution

Dear Jennifer Monson:

CenterPoint Energy has no objection or issues related to the Proposed Beltline Station Development EAW Distribution.

Thank you for the advance notice. If you have any questions, please feel free to call me at 612-321-5381.

Respectfully,
CENTERPOINT ENERGY

A handwritten signature in cursive script that reads "Chuck Mayers".

Chuck Mayers, **SRWA**
Right of Way Agent III
charle.mayers@centerPointenergy.com

PC: Kevin J. Busscher, C&M Supervisor, CenterPoint Energy
Robert A. Meyer, C&M Advance Foreperson, CenterPoint Energy
Thomas Haider, Senior Engineer Gas, CenterPoint Energy

August 2, 2021

Jennifer Monson, Senior Planner
City of St. Louis Park
5005 Minnetonka Blvd.
St. Louis Park, MN 55416

RE: EAW – Beltline Station Development
Redevelop an approximately 7-acre site south of CSAH 25 and east of Beltline Blvd
T28 R24 S6, St. Louis Park, Hennepin County
SHPO Number: 2021-2425

Dear Jennifer Monson:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project.

According to the EAW, a developer is proposing to redevelop an approximately 7-acre site south of CSAH 25 and east of Beltline Boulevard in St. Louis Park. The proposed development will include one mixed-use building and two residential buildings with a total of 403 multi-family units and up to 21,800 square feet of ground floor commercial. The proposal also includes a parking structure, parking within each building, and surface parking.

According to our records, the **Peavey-Haglin Experimental Concrete Grain Elevator**, which is listed in the National Register of Historic Places and is also a National Historic Landmark, is located west of the proposed development on the Nordic Ware property. Based on our review of the project information, we conclude that the historic property will not be affected by the proposed development. We have also reviewed the proposed project in regard to impacts to archaeological resources and we do not believe that an archaeological survey is warranted for this project. Therefore, based on information that is available to us at this time, we conclude that there are **no properties** listed in the National or State Registers of Historic Places and no known or suspected archaeological properties in the area that will be affected by this 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.

Please contact Kelly Gragg-Johnson, Environmental Review Specialist, at kelly.graggjohnson@state.mn.us if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

August 3, 2021

Jennifer Monson
Senior Planner
City of St. Louis Park
5005 Minnetonka Boulevard
St. Louis Park, MN 55416

RE: Beltline Station Development Environmental Assessment Worksheet

Dear Jennifer Monson:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Beltline Station Development project (Project) in the City of St. Louis Park (City), Hennepin County, Minnesota. The Project consists of a 7 acre mixed use development. 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 of the EAW includes the United States Army Corps of Engineers (USACE) Section 404 permit and therefore must include the MPCA 401 Water Quality Certification.

Please note that the 401 Water Quality Certification becomes an enforceable component of the associated federal license or permit – issued under either Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. The scope of a Clean Water Act Section 401 Certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. Revisions to the Section 401 rule became effective in September 2020, and now require applicants to request a pre-filing meeting from the certifying agency at least 30 days prior to submitting a 401 Water Quality Certification request. The MPCA is the certifying authority in the State of Minnesota.

Also, please keep in mind that in accordance with Minnesota Statutes, the Project should include the MPCA as a regulator of all surface waters as defined by Minn. Stat. § 115.01, subd. 22. Waters of the state. "Waters of the state" means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the state or any portion thereof. Even though there may be surface waters that are determined to be USACE non-jurisdictional, or exempt from the Wetlands Conservation Act, *all surface waters are regulated by the MPCA* and any surface water impact needs to be described in the application and may require mitigation. For further information about the 401 Water Quality Certification process, please contact Bill Wilde at 651-757-2825 or at william.wilde@state.mn.us.

Water Resources (Item 11)

- Because the Project includes redevelopment of existing impervious areas, these areas should be included with the total water quality volume accounted for in the stormwater management plan as required by the City's MS4 Permit, unless the area has existing stormwater management that complies with the current National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit.
- The EAW indicates plans to utilize an existing regional pond in a nearby park for stormwater discharges from the site. It should be noted that the existing regional stormwater pond cannot be used for stormwater treatment if it was wetland that did not go through the wetland mitigation process and must also comply with current stormwater management requirements.
- The EAW also discusses use of biofiltration gardens and underground pipe detention and not infiltration due to site contamination. If infiltration is prohibited, consider other methods of volume reduction, such as water reuse. The Project proposer also is strongly encouraged to include trees in the site design to help absorb stormwater and improve energy efficiency of buildings. A green roof can also help reduce stormwater runoff and reduce energy use.
- If the site has the ability to discharge stormwater to the impaired waters that have construction-related impairments within 1 mile of the site, additional Best Management Practices are required during construction. These include providing temporary ponding for 5 acres draining to one location on the Project and stabilizing inactively worked soils within seven days. Please direct questions regarding CSW Permit requirements to Roberta Getman at 507-206-2629 or at roberta.getman@state.mn.us.

Contamination/Hazardous Materials/Wastes

As indicated in the EAW, the Phase I Environmental Site Assessment identified issues of concern on the proposed Project site. These issues have the potential to cause contamination to soils and groundwater. Project proposers/developers considering construction on or near contaminated properties should begin working early in their planning process with the MPCA's Brownfields Program to receive necessary technical assistance in managing contamination. For some properties, special construction might be needed to prevent the further spreading of the contamination and/or prevent vapors from entering buildings or utility corridors. Because this is a residential development, the MPCA recommends the Project proposer conduct a Phase II Environmental Investigation to assess the presence of contamination prior to starting construction activities. State law requires that persons properly manage contaminated soil and water they uncover or disturb - even if they are not the party responsible for the contamination. The MPCA's Brownfields Program can provide necessary technical assistance in managing contamination. Information regarding the Brownfields Program can be found at:

<https://www.pca.state.mn.us/waste/brownfields>.

If contamination is encountered during development activities, it must be reported immediately to the State duty officer at 651-649-5451 or 800-422-0798.

Jennifer Monson

Page 3

August 3, 2021

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. 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 EAW, please contact me by email at karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,

Karen Kromar

This document has been electronically signed.

Karen Kromar

Project Manager

Environmental Review Unit

Resource Management and Assistance Division

KK/WW/RG:vs

cc: Dan Card, MPCA, St. Paul
Bill Wilde, MPCA, St. Paul
Roberta Getman, MPCA, Rochester



August 03, 2021

TO: City of St. Louis Park, Jennifer Monson

FROM: Minnehaha Creek Watershed District, Abigail Ernst

RE: Beltline Station Development Environmental Assessment Worksheet

Dear Ms. Monson,

The Minnehaha Creek District is writing to provide comments on the Beltline Station Environmental Assessment Worksheet (EAW). Staff have reviewed the relevant documents and would like to flag the following items:

1. On page 29 of the EAW it states that, "The Project will **contribute to the urban tree canopy, reduce impervious surface on the project site**, and provide multi-modal connections, which is consistent with relevant polices identified in the 2040 Comprehensive Plan."
 - a. The table on page 7 shows impervious surface increasing from 2.8 acres to 5.4 acres and wood/forested areas decreasing from 1.3 to 0.0 acres.

There is conflicting information regarding the impervious surface and tree cover on-site, please clarify the amount of hardcover and urban tree canopy included a part of the project.

The District looks forward to working with the City of St. Louis Park as plans for this development progress. From a preliminary review, the project will trigger Stormwater Management rules, and the Wetland Conservation Act. Additional information for each rule trigger can be found below.

Stormwater Management:

The District's Stormwater Management Rules is triggered for the redevelopment of impervious surface. Depending on the amount of impervious surface proposed compared to the existing, one of the following treatment scenarios will apply:

If a decrease or no change in impervious surface is proposed:

Site Size	Site Disturbance	Impervious Surface Reduction	Requirements
>1 acre - ≤ 5 acres	≥ 40% site disturbance	10% reduction in impervious surface	None
		0-9% reduction in impervious surface	Volume control required for site's impervious surface

We collaborate with public and private partners to protect and improve land and water for current and future generations.



If an increase of impervious surface is proposed:

Site Size	Site Disturbance	Requirements	Treatment Scope
>1 acre	≥ 40% site disturbance	Phosphorus Control, Rate Control and Volume control	Entire site's impervious surface

WCA:

According to MCWD's records, the MCWD approved a wetland delineation Boundary & Type determination for this parcel in December of 2021. Since decisions issued by MCWD are valid for 5 years, the current Notice of Decision (MCWD WCA NOD #W19-35) is still valid. It appears that one wetland will be impacted as a result of the proposed development. If that is the case, a replacement plan to offset impacts will be required to be provided for District review.

Please let me know if you have any questions by emailing me at aernst@minnehahacreek.org. Thank you for the opportunity to comment.

Sincerely,

Abigail Ernst
Permitting Technician

We collaborate with public and private partners to protect and improve land and water for current and future generations.

August 4, 2021

Jennifer Monson, Senior Planner
City of St. Louis Park
5005 Minnetonka Boulevard
St. Louis Park, MN 55416

**RE: City of St. Louis Park - Environmental Assessment Worksheet (EAW) –
Beltline Station Development**
Metropolitan Council Review No. 22583-1
Metropolitan Council District No. 6

Dear Ms. Monson:

The Metropolitan Council received the EAW for the Beltline Station Development in St. Louis Park on June 29, 2021. The proposed project is located immediately north of the METRO Green Line Beltline Boulevard Station southeast of the intersection of Beltline Boulevard and County Road 25. The proposed development of seven acres will include 403 housing units in three structures, 84 of which will be affordable. The project will also include 21,800 square feet of retail space and a 560-space parking structure, 268 spaces of which will be dedicated to park-and-ride for transit users. The Metropolitan Council and the St. Louis Park Economic Development Authority entered into a cooperative agreement for construction of the parking structure, which will be partly funded by a Congestion Mitigation and Air Quality (CMAQ) grant for the park-and-ride.

The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes.

We offer the following comments for your consideration.

Item 9. Land Use (*Todd Graham, 651-602-1322*)

The development location is a very small part of Transportation Analysis Zone (TAZ) #1394. TAZ forecast allocations for 2040 have been prepared by the City and are included in the City's comprehensive plan. The City expects TAZ #1394 will gain +924 households, +1700 population, and +445 jobs during 2020-2040. At this time, the forecast and TAZ allocation are adequate. Should other planned developments exceed that forecast, then Council staff would recommend increasing the forecast allocation for TAZ #1394.

Item 11. Water Resources - Wastewater (*Roger Janzig, roger.janzig@metc.state.mn.us*)

Metropolitan Council Dual Forcemain Interceptors (8041) are within the County Road 25 (Highway 7) right-of way, north of the proposed development. The interceptors were built in 2015 and are 24-inch PVC Pipes. There are specific processes that must be followed before encroachment on our property. Before encroachment on our property an Encroachment Agreement will be required. To obtain an Encroachment Agreement Application, contact Tim Wedin, Interceptor Engineering Assistant Manager (651-602-4571) at the Metropolitan Council Environmental Services. To assess the potential impacts to our interceptor system,

prior to initiating this project, preliminary plans should be sent to Tim Wedin, Interceptor Engineering Assistant Manager (651-602-4571) at the Metropolitan Council Environmental Services

It is the Council's understanding that the developer has already contacted the MCES regarding the relocation of the Metropolitan Council Dual Forcemain Interceptors and should continue the discussion regarding the relocation as the project continues.

The Metropolitan Disposal System has adequate capacity for this project location.

Item 15. Air – Vehicle Emissions (*Cameran Bailey, 651-602-1212*)

The EAW asks proposers to identify measures (e.g., traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions. The City's comprehensive plan includes the climate action plan strategy: "Reduce vehicle miles traveled (VMT) by encouraging residents and businesses to replace existing vehicles with more fuel-efficient models, including electric vehicles (EVs), and by expanding EV charging infrastructure." The Council recommends that City and developer consider the integration of EV charging infrastructure (or EV-ready infrastructure) to support this strategy and to serve some portion of the parking spaces throughout the development. Guidance can be found in the Great Plains Institute's "Becoming Electric Vehicle Ready" guideline document (<https://www.driveelectricmn.org/becoming-ev-ready/>).

Item 18. Transportation (Steve Mahowald, 612-349-7775)

The developer is responsible to continue to honor the commitments made during the right-of-way acquisition process with the Metropolitan Council. This includes, but is not limited to, maintaining access along the frontage road to General Office Products until the intersection at Lynn Avenue/CSAH 25 is complete and the Backage Road is completed to Monterey Avenue from Lynn Avenue. Coordination with the Metropolitan Council's contractors is required for construction of both projects, including, but not limited to, the Backage Road, Monterey Avenue, underground utilities, communications, signage, cameras, bus shelters, etcetera.

Any costs associated with any future modifications at the Beltline Boulevard/Backage Road and Monterey/CSAH 25 intersections, or the alignment of the Backage Road, shall not be the responsibility of the Metropolitan Council.

The Metropolitan Council has reviewed the ¾ turning movements at the modified Beltline Boulevard/Backage Road intersection as proposed and has found no detrimental impacts to traffic operations as long as westbound left turning movements to southbound Beltline Boulevard are prohibited with a curb or median.

The Metropolitan Council requires that the bus bay along the proposed modifications to the Backage Road have 120 feet of straight curb. Please note that the developer will be responsible for the street lighting, sidewalk, landscaping, and concrete pad and electrical conduit re-routing for the bus shelter.

The Metropolitan Council requires that stair/elevator remain at the southwest corner of the parking structure and that the north-south pedestrian crosswalk at the Backage Road be minimized as much as possible.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Michael Larson, Principal Reviewer, at 651-602-1407 or via email at michael.larson@metc.state.mn.us.

Sincerely,

ERIC WOJCHIK for

Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Lynnea Atlas-Ingebretson, Metropolitan Council District 6
Michael Larson, AICP, Sector Representative / Principal Reviewer
Reviews Coordinator

N:\CommDev\LPA\Communities\St. Louis Park\Letters\St. Louis Park 2021 EAW Beltline Station 22583-1.docx

From: [Collins, Melissa \(DNR\)](#)
To: [Jennifer Monson](#)
Cc: wanderson@sherman-associates.com
Subject: Beltline Station Development - DNR Comments
Date: Thursday, August 5, 2021 3:42:10 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image002.png](#)

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Dear Jennifer Monson,

Thank you for the opportunity to review the Beltline Station Development EAW. The DNR respectfully submits the following comments for your consideration:

1. Page 11, Soil and Topography. Please note that an Erosion Hazard Rating of “Not Rated” means that there is not enough information to make a determination regarding soil erodibility, not that “erosion is unlikely.” In general, urban soils are more prone to erosion because of previous disturbance and compaction, and we are pleased that a SWPPP will be prepared for the site.
2. Page 14, Stormwater. The planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this [website](#). Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

We also encourage cities and counties to provide public outreach to reduce the overuse of chloride. Here are some [educational resources](#) for residents as well as a [sample ordinance](#) regarding chloride use.

3. Page 15, Water Appropriation. Please be aware that if underground parking or facilities require sump pumping of groundwater in volumes that exceed 10,000 gallons of water per day or one million gallons per year, a DNR Water Appropriation Permit would be required.
4. Page 20, Rare Species. We appreciate that native pollinator-friendly vegetation will be used in landscaping and stormwater retention ponds, and that trees will be planted throughout the parking lot to reduce the urban heat island effect.

5. Appendices. Please note that agency correspondence should be included in the EAW appendices. It is unclear if the proposer requested concurrence from DNR regarding their NHIS query.

Thank you again for the opportunity to review this document, and please let me know if you have any questions regarding these comments. A confirmation of receipt would be most appreciated.

Thank you,

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