

ENVIRONMENTAL ASSESSMENT WORKSHEET

This Environmental Assessment Worksheet (EAW) form and EAW Guidelines are available at the Environmental Quality Board's website at:

<http://www.eqb.state.mn.us/EnvRevGuidanceDocuments.htm>. The EAW form provides information about a project that may have the potential for significant environmental effects. The EAW Guidelines provide additional detail and resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item, or can be addresses collectively under EAW Item 19.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation and the need for an EIS.

1. **Project title:** Parkway Residences

2. **Proposer:** Sela Investments, Ltd, LLC
Contact person: Michael Margulies
Title: Owner Representative
Address: 2007 W. Franklin
City, State, ZIP: Minneapolis, MN 55405
Phone: 612-205-0521
Fax: NA
Email: michaelmargulies7@gmail.com

3. **RGU**
Contact person: Jennifer Monson
Title: Planner
Address: 5005 Minnetonka Blvd.
City, State, ZIP: St. Louis Park, MN 55416
Phone: 952-928-2841
Fax: 952-924-2662
Email: jmonson@stlouispark.org

4. **Reason for EAW Preparation:** (check one)

Required:

- EIS Scoping
 Mandatory EAW

Discretionary:

- Citizen Petition
 RGU discretion
 Proposer initiated

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

Rules 4410.4300, subpart 19 C. Residential Development & 4410.4300, subpart 1, 3-year look-back.

5. **Project Location:**

County: Hennepin
City/Township: St. Louis Park
PLS Location (1/4, 1/4, Section, Township, Range): N 1/2 NE 1/4 Sect 6 T.28, R.24
Watershed (81 major watershed scale): Minnehaha Creek
GPS Coordinates: Latitude: 44°56'48.51"N, Longitude: 93°19'52.49"W
Tax Parcel Number: 0602824110004, 17, 18, 19, 20, 21, 22, 26, 27, 28, 29, 30, 33, 36, 57

Figures:

- Figure 1 – Site Location Map
- Figure 2 – USGS Topography Map
- Figure 3a – Pre-Construction Site Plan
- Figure 3b – Post Construction Site Plan
- Figure 3c – Parkway Residences Site Data
- Figure 4 – St. Louis Park – Existing Land Use Plan
- Figure 5 – St. Louis Park – Future Land Use Plan
- Figure 6 – MPCA Special & Impaired Waters Map
- Figure 7a – MPCA Well Receptors Investigation Report
- Figure 7b – Well Physical Setting Source Map
- Figure 7c – Well Physical Setting Source Summary
- Figure 8 – St. Louis Park – Regional Sanitary Sewer System Map
- Figure 9a – AET Letter for Closure
- Figure 9b – Site Management Decision
- Figure 9c – AET Map for Subsurface Assessment
- Figure 10 – DNR Letter
- Figure 11 – SHPO Letter

Appendix A – Site Map with Photos

Appendix B – Parkway Residences Development Traffic and Parking Study

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

County map showing the general location of the project; (Figure 1)

- U.S. Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries (photocopy acceptable); (Figure 2) and
- Site plans showing all significant project and natural features. Pre-construction site plan and post-construction site plan. (Figures 3a & 3b)

Figures 1, 2, 3a & 3b

6. Project Description:

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

The Parkway Residences development, located along West 31st Street near Glenhurst Ave, will consist of four new multi-family buildings creating 224 new units plus the restoration of three existing apartment buildings that contain 24 units for a total of 248 residential units. The project removes twelve existing buildings including single-family homes and apartments.

- 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.**

The Parkway Residences project is a collection of 15 properties consisting of single-family homes and an assortment of smaller apartment buildings along both sides of West 31st Street between Inglewood Avenue S. and Glenhurst Avenue. The development properties are not all contiguous thus the project will be built amongst other existing buildings. The project will remove twelve of the existing buildings and will reinvest in the restoration of three apartment buildings. The development consists of four new multi-family buildings creating 224 new units plus 24 units from the restored apartment buildings for a total of 248 residential units. The development plan segments the project into four campuses to be built in phases: west campus, north campus, southwest campus and southeast campus plus the three existing apartment buildings to remain.

The west campus includes an existing strip center at the SE corner of Inglewood Avenue S. and County Road 25 that will be replaced with an 11-story apartment building. The apartment will consist of eight-floors of residential units (84 units) with parking and lobby space in the first two floors and the 11th floor dedicated to amenity space. There is one-level of underground parking.

The north campus is toward the center of the site and includes six existing residential buildings north of West 31st Street. The homes will be replaced with a 4-story, 95-unit apartment building with two-levels of underground parking. A city lift station (Glenhurst lift station) is located on the northeast corner of parcel 4000 West 31st Street. A parking area will be provided adjacent to the existing lift station building. This space will be located on the north side of the building and will allow for maintenance. If the entire alley is vacated, an easement will need to be created for this area. This apartment building is expected to be the first phase of the project.

The southwest campus is at the corner of Inglewood Avenue S. and West 31st Street. It includes the removal of three existing single-family homes for the construction of a 4-story, 39-unit apartment building with one level of underground parking. The southwest campus is proposed to be a later phase of the project.

The southeast campus consists of two single-family homes that will be developed as a 6-unit townhome. The townhome will be developed with affordable units as part of the city's inclusionary housing policy requirement to provide replacement housing for the naturally occurring affordable housing (NOAH) existing in the project area.

The existing housing includes the three apartment buildings south of West 31st Street that will remain and be renovated. The apartments include a total of 24 units which 22 are dedicated as naturally occurring affordable housing (NOAH) and will remain as NOAH designated housing units.

The Parkway Residences development is proposed to start construction in the Spring of 2020 with the 4-story, 95-unit apartment building plus the renovations of the three existing apartment buildings. Following phases will be based on market demand and entitlements. It is expected that market demand will be supported by the project being within ½ mile of both the Beltline Station and the West Lake Station on the Southwest Light Rail (SWLRT) Corridor and the success of Parkway 25. There are no changes to the alignments of the existing utilities or roadways except for the narrowing of West 31st Street in an effort to slow traffic, improve stormwater and add greenspace.

Parkway Residences follows Sela Investments, Parkway 25 project (4015 County Rd 25) that was constructed in 2017. Parkway 25 is a 5-story, mixed-use building consisting of 112 apartment units and 12,000 square feet of ground floor commercial space. The combined projects include a total of 360 residential units and 12,000 square feet of commercial/office space. Parkway 25 was not reviewed as an EAW. However, Parkway 25 in combination with the proposed Parkway Residences, crosses the threshold of a Mandatory EAW by having a total of more than 150 attached units, including a change to the comprehensive plan from medium density to high density. The two projects are within the Mandatory EAW per MN Rules 4410.4300, subpart 19 C. Residential Development & 4410.4300, subpart 1, 3-year look-back thus requiring the need for an EAW.

c. Project magnitude:

| | |
|--|--|
| Total Project Acreage | 3.5 acres |
| Linear project length | NA |
| Number and type of residential units | 248 multi-family |
| Commercial building area (in square feet) | NA |
| Industrial building area (in square feet) | NA |
| Institutional building area (in square feet) | NA |
| Other uses – specify (in square feet) | existing lift station, 375 sq. ft |
| Structure height(s) | Varied building heights for the proposed 2, 3, 4 and 11 story buildings with heights ranging between 31 to 140 feet. |

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.

Parkway Residences is a private development proposed to meet the market demands of apartment living near the Southwest LRT Beltline Boulevard station and the surrounding amenities in St. Louis Park. The project will include three existing apartment buildings that will contain 22 naturally occurring affordable (NOAH) units plus 6 new affordable townhome units as defined by the City’s inclusionary housing policy.

e. Are future stages of this development including development on any other property planned or likely to happen? Yes No
If yes, briefly describe future stages, relationship to present project, timeline and plans for environmental review.

f. Is this project a subsequent stage of an earlier project? Yes No
If yes, briefly describe the past development, timeline and any past environmental review.

Parkway Residences follows Sela Investments’ Parkway 25 project (4015 County Rd 25) that was constructed in 2017. Parkway 25 is a 5-story, mixed-use building consisting of 112 apartment units and 12,000 sq. ft of ground floor commercial space. The combined projects include a total of 360 residential units and 12,000 square feet of commercial/office space. Parkway 25 was not reviewed under an EAW.

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 | 0 | 0 | Lawn/landscaping | 2.0 Ac. | 2.6 |
| Deep water/streams | 0 | 0 | Impervious surface | 1.5 Ac. | 0.9 |
| Wooded/forest | 0 | 0 | Stormwater Pond | 0 | 0 |
| Brush/Grassland | 0 | 0 | Other (describe) | 0 | 0 |
| Cropland | 0 | 0 | | | |
| | | | TOTAL | 3.5 Ac. | 3.5 Ac. |

The primary reason for the increase of lawn/landscaping and decrease in impervious surface was created by narrowing 36th Avenue in order to improve traffic controls and add greenspace.

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.

Table 8.1 Required Permits

| Unit of Government | Type of application | Status |
|------------------------------------|---|---|
| Minnehaha Creek Watershed District | Stormwater management permit Erosion Control permit | Application not submitted Under a Memo of Understanding giving the city permitting authority |
| City of St. Louis Park | Preliminary Plat Final Plat Comprehensive Plan Amendment Rezoning to PUD Preliminary and Final PUD CUP for import/export of soils over 400 cubic yards Demolition permits Public right-of-way permit Sewer and Water permit Building permits (including building, electrical, mechanical, plumbing) Sign permits Erosion Control permit (MOU with watershed) TIF, Tax Increment Financing | Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted Application not submitted |

| | | |
|----------------------|--|---|
| | Alley Vacation, only if alternative access to the lift station is provided Dewatering Permit | Application not submitted Application not submitted |
| MPCA | Notification of intent to perform a demolition Construction site stormwater permit (NPDES) Sewer connection permit | Application not submitted Application not submitted Application not submitted |
| Metropolitan Council | Plans for on-site local sanitary sewer submitted to Environmental Service Engineering Staff Project plans (methods and means of providing wastewater services) submitted to Interceptor Engineering | Plans not submitted Plans not submitted |
| MDH | Water extension permit Asbestos Removal | Application not submitted Application not submitted |
| DNR | Water appropriation permit | Obtain if needed |
| MnDOT | Driveway access permits and utility permits Drainage permit Permit for use of or work on Highway 7 | Obtain if needed Obtain if needed Obtain if needed |

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

Cumulative potential effects are addressed under applicable EAW questions, not individually under Question 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 properties included within the project consist of 15 single-family homes and small apartment buildings all built between 1903 and 1967. The site includes one commercial strip center built in 1979. The surrounding area immediate adjacent the project is a mixture of similar type uses that extend to larger apartments, commercial and industrial uses beyond. In recent years the project area is seeing new development of large apartment complexes, including Parkway 25 and the Shoreham, a 148-unit mixed use development with 20,000 square feet of commercial, on the east side of Glenhurst Ave.

The site is bounded by Highway 7 to the north and the future Southwest LRT rail line plus the Cedar

Lake LRT Regional Trail bike/pedestrian trail to the south. Lake Bde Maka Ska and Lake Bde Maka Ska Park are located one-half miles to the east and Bass Lake is one-quarter mile to the southwest. The Minikahda golf course is generally 0.13 miles to the southeast. (Figure 4)

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.

The City has recently completed and adopted their 2040 Comprehensive Plan Update. The project site is guided TOD, Transit Oriented Development for the properties adjacent the south side of County Road 25 and RM-Medium Density Residential along both sides of West 31st Street. The TOD designation aims for a mix of uses oriented toward the light rail transit stop with a focus on building forms that create a pedestrian rich environment rather than a specific mix of uses. It is expected that residential uses will make up approximately 75 to 85 percent of the uses. The density of the proposed individual phases is between 68 to 146 units per acre with a total density of 70.85 units per acre. (Figure 5)

Parkway Residences will require the re-guiding from Medium Density to High Density to achieve the necessary density to support the project and the nearby LRT stations. The success for the investments made to construct the SWLRT and its stations is dependent on ridership and station area activity. TOD's are based on higher densities from developments that can provide a large mix of housing to serve a variety of incomes and promote transit ridership. The Medium Density Residential designation only allows net densities from 6 to 30 units per acre with housing types that are compatible in scale to single-family detached, duplexes, townhomes, and small two-or three-story apartment buildings. High Density Residential land uses are intended for compact urban residential areas with convenient access to major transportation corridors, open spaces and commercial centers with densities between 30 and 75 units per acre. As a TOD guided site, the site is best served as a High-Density Residential designation than a Medium Density Residential designation to meet TOD and station area development objectives.

Being within the one-half mile station radius for the Beltline Station the site is subject to the City's 2012 Beltline Area Framework & Design Guidelines. The Guidelines provide a long-term guide for shaping future changes in the Station Area by identifying preferred land uses, building patterns, and connectivity/access patterns for the future station area. Although the project will be at the eastern edge of the one-half mile station area and outside of the 10-minute walkshed it will incorporate the pedestrian friendly connectivity and densities that the plan highlights. Parkway Residences has incorporated the 10 Guiding Principles for the Beltline area as it captures the value of transit, creates a connected network of greater public spaces and assures superior walking and biking accessibility, to name a few. The project is not only close to two transit stations, Beltline and West Lake, it is also within a half mile to several lakes and parks. Pedestrian accessibility to transit, parks, lakes, regional trails and shopping via walking, biking, transit or automobiles connects Parkway Residences not only to the SWLRT but to the surrounding area and the region.

The project site is within the City's CSAH 25 South Wedge Character District as described in the Beltline Area Framework and Design Guidelines. Its location directly adjacent to the future Beltline Station and its existing highway character development make it an area with strong potential for attracting reinvestment and redevelopment that better fits with high quality transit access. The future identity of this area should be strongly linked to the Beltline Transit Station, evolving dramatically from its existing highway character to future development that is urban and transit-oriented in character. The Design Guidelines suggest allowing high density residential uses in the CSAH 25 South Wedge area east of Lynn Ave. S.

“CSAH 25 South Wedge

- a. Encourage predominately employment buildings, with support retail and service uses (where appropriate and feasible) along CSAH 25.
- b. Encourage commercial buildings at the intersection of CSAH 25 and Minnetonka Boulevard.
- c. Allow high density residential buildings east of Lynn Street.”

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

The northwest corner of the project site is zoned C-2 General Commercial. This area includes the existing strip center at the SE corner of Inglewood Avenue S. and County Road 25. The remaining parcels are zoned R-4 Multiple-Family Residence.

Parkway Residences is proposed to be re-zoned as a Planned Unit Development (PUD) to allow flexibility to facilitate a more cohesive and innovative site and building design contributing to the public good.

There are no Overlay Districts.

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

Parkway Residences is part of the continuing reinvestment in this area envisioned and planned for by the City’s 2040 comprehensive plan update and the Beltline Area Framework and Design Guidelines in anticipation of the 2023 opening of the Southwest LRT. The project compliments the Parkway 25 development, recently completed by Sela Investment, plus the Shoreham, a five-story 148-unit apartment building, and the other redevelopment projects occurring in the surrounding area. Providing the combination of new buildings and the renovation of existing buildings this project provides a good transition between existing and future land uses.

Because the site is currently fully developed with no existing natural features there are no environmental impacts with the proposed project.

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

Parkway Residences will include innovative greenspace and stormwater design to mitigate environmental effects. The development will add greenspace and narrow West 31st Street to minimize hard surface. Stormwater treatment and rate control will be incorporated per city and watershed requirements.

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 depth of bedrock at the project site area ranges from 50 feet to 125 feet, based on the Hennepin County Geologic Atlas and examination of nearby well records in the Minnesota Well Index. The first bedrock unit encountered is the Platteville Limestone, which is present with approximately 5 to 20 feet in thickness at or near the project site. The bedrock is overlain by a mixture of unconsolidated drift deposits containing sand, gravel, and clay.

While the uppermost bedrock is carbonite in nature, the likelihood for karst is fairly low. Karst conditions are more prevalent in areas where the depth to the carbonate bedrock is less than 50 feet and where the top of the water table fluctuates within the bedrock layer. Neither of these conditions are encountered at the project site.

- 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.**

A Geotechnical Engineering Report was prepared by Terracon on May 28, 2019 and found that the subject area (north campus) consisted of fill material to about 10 feet in depth where the borings then encountered sand materials until reaching limestone. The borings did not encounter groundwater but the site is subject to areas of potential perched water. The borings indicate that the site is suitable for the proposed development. Excavation is anticipated to be 24 feet in depth for the underground parking and that existing fill will be removed within the building foot print using shoring to protect nearby roadways and utilities. If perched water is discovered, dewatering may be needed.

Water was observed at boring locations 4, 5, and 6 at elevations ranging from 869 to 873 feet while drilling. They also stated that water contents of the sampled sand soils were relatively higher below depths of about 23 to 28 feet in these borings, which might serve as indication of presence of groundwater. Borings 2, 4, and 5 were terminated at depths of 50 feet. Boring 6 was terminated at a depth of 55 feet. Borings 1 and 3 had medium dense to dense sands at depths of 73.5 and 68.5 feet, respectively. Existing fill soils were observed in the area of the proposed building to depths ranging from about 4 to 10 feet.

The Web Soil Survey classifies the majority of the parcels project area as “urban land, Udorthents” (classification code U6B). This classification is mostly comprised of cut and fill land with very gradual slopes ranging from 0 to 6 percent slopes. These are well drained soils with typically little to no frequency of flooding or ponding. A slight portion of the northern most project area is comprised of “urban land, Udorthents – wet substratum” (classification code U1A). This classification is comprised of little to no slopes with a range from 0 to 2 percent slopes. They are well drained soils with no flooding or ponding.

Gentle existing slopes within the project area will result in relatively low erosion potential during demolition, construction and while site operational activities are occurring. Existing and newly installed

catch basins in the project site will be protected with appropriate erosion and sediment control devices during construction to limit erosion and potential runoff to surface waters until permanent erosion control measures are established.

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.

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 project area does not include any surface waters and no wetlands are indicated on the National Wetland Inventory mapping. There are several lakes surrounding the site that include; Bass Lake is one-quarter mile to the southwest, Lake Bde Maka Ska is located one-half mile to the east and Cedar Lake is located approximately one-half mile to the northeast, Lake of the Isles is located one mile to the northeast from the project area. All the lakes are considered DNR Public Waters.

Twin Lake is located approximately three-quarters of a mile from the site area and is designated an impaired water per MPCA's Special and impaired waters search. It is listed in the Category of Shallow Lake or Reservoir with an approximate surface area of 12.3 acres. Twin Lake's identification number is 27-0656-00. (Figure 6)

- 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.**

A Phase 1 Environmental Site Assessment was conducted on December 21, 2018 for 4000-4108 West 31st Street. The Phase 1 was conducted solely for the proposed 4-story apartment in the center of the project. It did not include all the properties in the project site but did review the surrounding area. The Phase 1 states that the estimated depth to groundwater is approximately 30-40 feet below the ground surface based on Kanivetsky, Roman, University of Minnesota Geological Survey, Hennepin County Quaternary Hydrogeology, County Atlas C-4, Plate 5, 1989. The report further notes that the Hydrogeologic gradient is not known, but the groundwater in the area generally flows southeast. This will be toward Lake Bde Maka Ska.

The project is not currently listed within a MDH wellhead protection area, however a past investigation report attached to the Phase 1 report noted that one (1) well was listed by the Minnesota Department of Health Well Index website that was within 500 feet of the site. It states that this well is likely not in

service anymore since it used to service a grain elevator located near the railroad tracks which is no longer present. The well's unique ID is 216066 and it is called Burdick Grain Co. well with an elevation of 891 feet. The Phase 1 included a Physical Setting Source Map identifying nearby wells. (Figures 7a, 7b, & 7c)

The proposed project activities and planned land uses are believed to pose a low threat to bedrock aquifers that supply the City's drinking water wells. The depth to the aquifers is approximately 260 to 280 feet at the project site, with multiple bedrock layers and confining units between the land surface and the bedrock aquifers.

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.

- 1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.**

The site is within the City's Meter Service Area M1312 which connects to the regional wastewater system (Figure 8). St. Louis Park sanitary sewer system transports wastewater to three Metropolitan Council Environmental Services (MCES) interceptors which transports the sanitary sewage to the Metro treatment facility in St. Paul. The City's sanitary sewer management plan conforms to the regional plan and has the capacity to accept and treat the proposed wastewater from Parkway Residences.

The sanitary waste generation for the project build-out is estimated to be 51,512 gallons per day based on the Metropolitan Council Sewer Availability Charge (SAC). The above estimate is based on the following calculations.

There are 224 new units = 224 (new units) – 34 existing units removed – 2 commercial SAC units (existing commercial building) = 193 new units.

Building 1 (north campus) – 95 new units -29 units removed = 66 units. 66 x 274 gallons = 18,084 gal

Building 2 (southeast campus) – 6 new units-2 units removed = 4 units x 274 gal = 1,096 gal

Building 3 (southwest campus) – 39 units - 3 units removed = 36 units x 274 gal = 9,864 gal

Building 4 (west campus) – 84 units – 2 commercial SAC units = 82 units = 22,468 gal

193 x 274 gallons = total of 51,512 gallons.

- 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.**

NA

- 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.

NA

- 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.**

The existing property generally consist of existing apartment buildings and single-family homes. Stormwater runoff from the existing property generally travels northeast where it enters the City of St. Louis Park storm sewer system. This storm sewer system ultimately discharges into Lake Bde Maka Ska. In the proposed condition, stormwater will follow a similar pattern as the existing. Stormwater runoff in the proposed condition will be collected and treated by pond or underground facilities to meet the requirements of the City of St. Louis Park, the Minnehaha Creek Watershed District, and the MPCA NPDES Permit.

Stormwater management will be provided on each of the subject parcels. The proposed stormwater management system will consist of underground filtration/detention tanks to meet the requirements of the City of St. Louis Park and the Minnehaha Creek Watershed District. Stormwater will be directed out to the public right-of-way and will ultimately connect into the existing storm sewer system in the intersection of Glenhurst Avenue and the Highway 7 Frontage Road. Stormwater discharges in the proposed condition will be cleaner water than the existing condition and at rates that are at or below the existing discharge rates.

Stormwater management on the project site is regulated by the city of St. Louis Park, Minnehaha Creek Watershed District (MCWD), and the State of Minnesota. The City requires that the post-redevelopment 100-year stormwater runoff peak rate be no more than that of the pre-redevelopment 10-year runoff peak rates. The MCWD permits no increase in stormwater rates over existing conditions for the 1-, 10- and 100-year storm events, using rainfall depths and Type II distribution from the National Oceanic & Atmospheric Administration's (NOAA) National Weather Service Atlas 14. Both the City and MCWD require stormwater abstraction in the amount of 1.0-inch of runoff over the impervious surfaces. The City requires no net increase over existing conditions for total suspended solids (TSS) and total phosphorus (TP). The MCWD requires that, in areas where it is infeasible to meet the MCWD volume control standard that phosphorus control be provided in the amount equivalent to that which would be achieved through the abstraction of 1.0-inch of rainfall from the site's impervious surfaces. The NPDES Stormwater Permit requires treatment of 1.0-inch of runoff from new impervious areas, if more than one acre of new impervious area is created. The NPDES Stormwater Permit also requires temporary erosion and sediment control measure be implemented.

Temporary runoff controls will include silt fence, biorolls, inlet protection, erosion control blanket, and rock construction entrances. Permanent stormwater runoff controls will include hardscape, full site vegetation, and proposed stormwater treatment BMP's. These BMP's could include above ground infiltration/filtration basins, underground infiltration/filtration basins, ponds, or proprietary filter devices.

The stormwater discharge plan will need to meet the city's discharge rate control requirements that a 6-inch discharge rate cannot exceed the existing 4.2-inch discharge rate. The project will complete the MPCA's screening assessment for contamination to justify any treatment of stormwater through infiltration.

- 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.**

Parkway Residences will connect to the City's water system which can adequately serve the project. The City derives its water supply from a series of 10 active wells that draw on the Prairie Du Chein-Jordan and Mount Simon-Hinkley aquifers. The total water production capacity of the City's active and alternate wells is 96 gpm (13.8 MGD). The firm capacity of the system, which assumes the largest well out of service, is 8,400 gpm (12.1 MGD). The current firm well capacity exceeds the most recent 5-year average maximum day demand of 9.3 MGD. No well abandonment is planned for the project. There are no current active wells believed to be within the project site area.

Dewatering is not expected to be needed for the project but if deemed necessary a dewatering permit will be obtained as regulated by the city, which includes permitting plans and groundwater testing. Water was encountered in borings at depths near 870 feet. However, perched water can be anticipated within fill layers and the contractor will be prepared to remove water that accumulates in excavations during construction.

iv. Surface Waters

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

There are no known wetlands on the project site.

- 2) Other surface waters- Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal and riparian alteration. Discuss direct and indirect environmental effects from**

physical modification of water features. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.

There are no surface water features within the project site nor any proposed alteration that will create a physical effect or alteration to any surrounding water feature. The development will be subject to the stormwater standards of the City and the watershed. Best Management Practices (BMP's) will be incorporated in to the development of the project as deemed appropriate by the City.

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.**

A Phase 1 Environmental Site Assessment was conducted on December 21, 2018 for 4000-4108 West 31st Street. The Phase 1 was conducted solely for the proposed 4-story apartment in the center of the project. It did not include all the properties in the project site but did review the surrounding area. The report states that the Site was not listed in regulatory state or federal database. However, the Glenhurst Lift Station was listed in the Leaking Underground Storage Tank (LUST) database. The lift station is located on the northeast corner of parcel 4000 West 31st Street. A 560-gallon diesel fuel underground storage tank was used to fuel the lift station prior 2010 until the City switched to a natural gas-fired generator. In preparation for the tank removal in 2009 diesel range organics contamination was encountered and the release was reported to the MPCA, who assigned the leak ID No. LS0017785. The tank was removed in October 2010, but contaminated soil was left in place due to proximity of the lift station building. Based on the result of the investigations it was concluded that the soil, groundwater and soil vapor impacts were limited to the vicinity around the tank basin.

Research on the MPCA's site "What's in my Neighborhood" resulting in the following findings on sites near the project area. The Parkway 25 redevelopment site contained some activities which included a voluntary investigation and cleanup program relating to brownfields. Two nearby users; Geno Healthcare LLC and Veterinary Ophthalmology Practice, both have uses that generate by-products that the MPCA considers to be hazardous waste. Geno Healthcare LLC produces approximately 220 pounds or less of hazardous waste per year and less than 2.2 pounds of acute hazardous waste per month. Veterinary Ophthalmology Practice creates less than 100 pounds of hazardous waste per year and none of which is classified as acute hazardous waste. The two users perform daily functions that maintain these small quantities of waste while disposing of the materials per the MPCA guidelines.

On November 9, 2010 American Engineering Testing, Inc. (AET) submitted a letter to the City recommending that the MPCA close their file for the Glenhurst leak based on their Limited Site Investigation Report. The investigation report under Section 3: Site Management Decision states:

(Figures 9a, 9b, & 9c)

“The horizontal and vertical extent of the petroleum contamination has been determined. Soil and Ground water contamination is present at the site, but is confined to the tank basin area. There is no indication that receptors within 500 feet are impacted by soil contamination, groundwater contamination or petroleum soil gas vapors. DRO is present in the groundwater, but only slightly elevated. Petroleum VOCs detected in the groundwater are below MDH HRLs. Excavation of contaminated soil is not practical in this case because of the proximity of the tank basin to the adjacent lift station structure, At the time of the investigation and subsequent tank pull observations, free product was not observed at the site.”

In consultation with the MPCA Petroleum release reporting group we were informed that the LEAK site file was closed in November of 2010.

The contaminated soil is well documented and will be monitored during the development of the site. The City will prepare a Contingency Plan and/or Response Action Plan to be approved by the City and any other overseeing regulatory agencies prior construction near the lift station.

- 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.**

During the construction phase solid waste such as lumber, sheetrock and other typical debris will be collected and disposed of to a demolition/construction landfill. The development will generate typical commercial and household solid waste per day. The City encourages recycling which will reduce the amount of solid waste. The waste will be disposed of by contracted waste removal operations that provide refuse collection services for all of the future generators.

The Phase 1 report noted that based on the age of the buildings it is possible that some asbestos-containing materials (ACM) and Lead-Based Paint (LBP) may exist based on the visual observation at the site. No samples of suspect ACM or LBP were collected or analyzed as part of the observations but it was recommended that an asbestos survey be conducted prior to renovations or demolition of buildings.

- 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.**

During construction, hazardous materials such as fuels (small quantities stored above ground) and specific construction materials would be on site during construction and stored and handled in conformance with state and federal regulations to prevent accidental spill or release of hazardous materials. Builders and contractors are responsible for proper management of hazardous materials utilized during construction. The contractor would minimize and mitigate adverse effects from the generation and storage of hazardous

wastes by recycling wastes that can be recycled, and by developing a spill prevention plan for the project.

- 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.**

Outside of the materials described above, the project is not anticipated to generate or require the storing, handling or disposal of hazardous wastes during construction or operation of the project.

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 site contains no fish or wildlife resources or habitats except for maintained residential yards.

- b. Describe rare features such as state-listed (endangered, threatened or special concern) species, native plant communities, Minnesota County Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-____) and/or correspondence number (ERDB 20200023) 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.**

On August 26, 2019 we received a letter from the Minnesota Department of Natural Resources, Natural Heritage Review (**ERDB 20200023**) noting that based on their review they concluded that they do not believe the proposed project will negatively affect any known occurrences of rare features. (Figure 10 – DNR, Natural Heritage Review Letter)

- 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.**

No known threatened or endangered species will be affected by this project. Currently the site does not have any significant wildlife or plant communities. However, any existing urban wildlife will benefit from the project by the inclusion of added green space, trees and assorted shrubs and plants. The project will include the addition of landscape areas with higher quality plant material with an emphasis on native plant material, which should be beneficial to any wildlife. The project will specify the use of weed free topsoil to minimize the spread of invasive plants species. Additionally, continued maintenance of the site will minimize future invasive species establishment.

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

Best management practices, including erosion and sedimentation control devices will be used during construction activities to prevent sediment-laden stormwater runoff from the project site.

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.

On August 6, 2019 we received a letter from the State Historic Preservation Office (SHPO, Project #2019-2095) noting that based on their review they concluded 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. (Figure 11 – SHPO Letter)

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.

Lake Bde Maka Ska is within one-half mile east from the site. Although not currently visible from the project area, residents in the upper-floors of the proposed apartment building may gain a scenic view of the lake.

There are no anticipated visual effects from the project site as it will complement the existing uses surrounding the area. Due to the multi-family uses within the development there will be lights needed for parking lots and pedestrian trails that will extend into the evening hours. The lights will have shields to minimize glare and spilling of lighting into the night sky and neighboring properties. Lights for the development will be subject to city ordinances and the PUD Master Plan review process.

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.**

Buildings will be heated with a combination of electric and gas power mechanical units. Gas will also be used for the building hot water system. Emissions from the heating and cooling units would be typical of similar type residential developments.

- 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.**

Construction vehicles will create temporary exhaust emissions while grading the site. Construction activities will be conducted during daytime regulated hours and all vehicles will be to state and federal

standards. The proposed project will generate an increase in carbon monoxide levels due to an increase in passenger vehicle and truck trips. The project will not require an indirect source permit. No baseline air quality monitoring or modeling is proposed and no measures to mitigate for the increase in vehicle related emissions are being considered.

- 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.**

Dust and odor will be restricted to development activities occurring on the site. Construction vehicles may create dust if the construction conditions are dry. As this is a multi-phased project with multiple uses development activities will be occurring sporadically through the full-build out of the project. During times of construction activity dust control measures will be utilized per the city permits.

The sensitive receptors in the vicinity include single-family and multi-family residential housing, Lake Bde Maka Ska, Minikahda Golf Club, Bass Lake Park and the Cedar Lake LRT Regional Trail bike/pedestrian trail. All other uses in the surrounding area are commercial/office development or urban developed land.

Development of the site will be subject to dust and odor control through the PUD master plan review process in accordance to city ordinances.

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.**

Construction vehicles will generate temporary intensity increases to the existing noise levels. Construction activities will be conducted during daytime regulated hours and all vehicles will be to state and federal standards. The noise generated will be no different than previous development activities and regulated by approved permits.

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.**

A traffic and parking study was conducted by SRF dated September 6, 2019. Their review was based on an earlier version of the site plan than the one included in the EAW. The difference between the two plans is a difference of two units for the 11-story bldg. The traffic study notes an 86-unit building while the EAW notes an 84-unit building. The two-unit difference does not impact the findings of the traffic study. (Appendix B)

Per the traffic study the proposed development is broken in four (4) development sites/campuses.

- Site 1 (north campus) is currently occupied by three (3) single-family homes and three (3) 12-unit apartment complexes, to be replaced by a 95-unit apartment building with 139 parking stalls.
- Site 2 (southeast campus) is currently occupied by two (2) single-family homes and would be replaced by six (6) townhomes with 12 parking stalls
- Site 3 (west campus) is currently occupied by a veterinary clinic and would be replaced by an 11-story, 84-unit apartment building with 146 parking stalls.
- Site 4 (southwest campus) is currently occupied by three (3) single-family homes and would be replaced by a 39-unit apartment building with 34 parking stalls.

In total, the development includes 224 units and 331 parking stalls with all current land uses planned to be replaced by the proposed development.

A trip generation was completed for the proposed development using the *ITE Trip Generation Manual, Tenth Edition*. Note that a 10 percent modal reduction was applied to the proposed development trip generation to account for available and planned transit options in the immediate study area (Metro Transit Route 17 and future Green Line LRT). Accounting for the modal reductions, the proposed development is expected to generate a total of approximately 69 a.m. peak hour, 82 p.m. peak hour, and 1,040 daily trips.

To determine the approximate net change in overall roadway system trips, trips from the existing land uses were subtracted from the proposed development site trips. Taking into account the existing site trip reductions, the proposed development is expected to generate a total of approximately 34 a.m. peak hour, 38 p.m. peak hour, and 636 daily net new system trips.

In addition to the transit options available, an extensive sidewalk and bike path network is available within the immediate vicinity of the proposed development. The Cedar Lake LRT Trail provides connections to both southwestern suburbs and Downtown Minneapolis. Additionally, this bicycle network connects with the Midtown Greenway, which provides a bicycle connection to St. Paul. Graphics of these options are available within the traffic and parking study attached. (Appendix B, Traffic Report)

- 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,***

Although the expected peak hour trip generation of the proposed project is estimated to be 69 a.m. peak hour, 82 p.m. peak hour, and 1,040 daily trips (prior to reductions of existing site trips), an intersection capacity analysis was completed. Results of the 2025 build condition intersection capacity analysis indicates that all study intersections are expected to operate at an acceptable overall LOS C or better during the a.m. and pm. peak hours.

Based on a year 2025 traffic impact analysis, there is expected to be minimal impact from the proposed project on the local and regional transportation system. No mitigation to either traffic controls or roadway

geometry is warranted to accommodate the development based upon current traffic management standards.

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

The proposed site plan includes sidewalks along the CSAH 25 Frontage Road, Glenhurst Avenue, and Inglewood Avenue. The sidewalks have appropriate connections to the development as well as to proposed parking lots. These sidewalk connections can help accommodate multimodal users, which can reduce vehicular impacts on area roadways. The sidewalk improvements will help provide connections for residents and guests to utilize transit and the extensive city/regional trail system.

Shared parking between the four (4) development sites should be utilized to minimize impacts on available on-street parking to meet City parking requirements and ITE parking demand estimates. Additionally, travel demand management strategies can be implemented to reduce vehicular ownership to meeting parking demands.

19. Cumulative potential effects: (Preparers can leave this item blank if cumulative potential effects are addressed under the applicable EAW Items)

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

NA

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.

NA

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.

NA

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.

The project site is within an observed Eruv, a boundary used by Orthodox Jews to expand the area where observants can carry objects on the Sabbath. An Eruv is an artificial boundary demarcated by string or similar marking that encircles a neighborhood. The result is that every place within the radius of the string is "home" allowing for a broader category of activities to occur. Within the project area all the land north of West 31st Street is within the Eruv. As the developer of the Parkway 25 building, the developer is

aware of this observation and is familiar with developing within the Eruv. The City and developer will coordinate with the Jewish community to discuss if any protocols are necessary during the construction of the project.

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 Jennifer Monson

Date 10/10/19

Title Planner