

## Resolution No. 21-093

### Approving record of decision and the negative declaration of need for an environmental impact statement for the Beltline Station Development

#### South of CSAH 25 near Beltline Boulevard

**Whereas**, Sherman Associates (“Proposer”) proposes to redevelop 3 parcels in St. Louis Park to construct 401 new residential units and 21,800 square feet of commercial space to create Beltline Station Development; and

**Whereas**, the project crosses the threshold of a mandatory environmental assessment worksheet (“EAW”) by having a total of more than 375 attached units in a mixed residential and commercial development per Minnesota Rules, part 4410.4300, subpart 32; and

**Whereas**, the EAW was prepared by Kimley-Horn on behalf of the Proposer, who submitted completed data portions of the EAW to the City of St. Louis Park consistent with Minnesota Rules, part 4410.1400; and

**Whereas**, the EAW was prepared using the form approved by the Minnesota Environmental Quality Board (EQB) for EAWs in accordance with Minnesota Rules, part 4410.1300; and

**Whereas**, the City of St. Louis Park submitted a copy of the EAW to all public agencies on the EAW distribution list and published EAW availability in the *EQB Monitor* on July 6, 2021, in accordance with applicable state laws, rules, and regulations; and

**Whereas**, the EAW comment period lasted from July 6, 2021 to August 5, 2021, and six (6) regulatory agencies and three (3) members of the public submitted written comments during the comment period; and

**Whereas**, the City of St. Louis Park acknowledges the comments received from the State Historic Preservation Office, the Minnehaha Creek Watershed District, the Minnesota Pollution Control Agency, Metropolitan Council, the Minnesota Department of Transportation, the Minnesota Department of Natural Resources, Nancy Rose, Friends of Bass Lake and Center Point Energy; and

**Whereas**, city staff reviewed the proposed record of decision and finds it to be consistent with the evidence submitted to the city and the applicable statutes and regulations, to the best of their knowledge, and recommends the City Council approve the findings of fact and record of decision dated August 2021 and determine that no environmental impact statement (“EIS”) is necessary, reasonable or warranted with respect to the Project under the circumstances; and


**Whereas**, the City Council desires to make findings of fact and a record of decision that no EIS is required with respect to the Project (“Negative Declaration”).

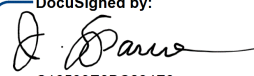
**Now therefore be it resolved** that the City Council does hereby:

1. Adopt and approve the findings of fact and record of decision for the Beltline Station Development environmental assessment worksheet in the form which is attached hereto as Exhibit A and hereby makes the findings of fact and conclusions which are contained therein; and
2. Find and determine that, based upon the findings of fact and record of decision, no environmental impact statement is required for the Project pursuant to the Minnesota Environmental Policy Act or Minnesota Rules, parts 4410.0200 to 4410.6500.


Reviewed for administration:

Adopted by the City Council August 23, 2021

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Kim Keller, city manager

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Jake Spano, mayor

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Melissa Kennedy, city clerk

Resolution No. 21-093

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**EXHIBIT A**

**BELTLINE STATION DEVELOPMENT, ST. LOUIS PARK**  
**Findings of Fact and Record of Decision**

City of St. Louis Park  
August 2021

## 1. Administrative Background

Sherman Associates Development, LLC is proposing to redevelop an approximately 7-acre site south of CSAH 25 and east of Beltline Blvd in St. Louis Park, Minnesota. The mixed-use, transit-oriented development is located immediately north of the Southwest LRT Beltline Blvd. Station, and 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.

The City of St. Louis Park is the Responsible Governmental Unit (RGU) for this project. An Environmental Assessment Worksheet (EAW) has been prepared in accordance with Minnesota Rules Chapter 4410. The EAW was mandatory per Minnesota Rules, part 4410.4300, subpart 32: Mixed residential and industrial-commercial projects.

The EAW was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comment to the required distribution list. A notice of availability was published in the *EQB Monitor* on July 6, 2021. A notice was also published in the Sun Sailor newspaper. This notice included a description of the project, information on where copies of the EAW were available, and invited the public to provide comments.

The EAW was made available electronically on the City of St. Louis Park's website at <https://www.stlouispark.org/government/departments-divisions/community-development/development-projects/beltline-development> and in hard copy at the following locations:

- St. Louis Park City Hall, 5005 Minnetonka Boulevard, St. Louis Park, MN 55416
- St. Louis Park Library, 3240 Library Lane, St. Louis Park, MN 55426

The EAW comment period extended from July 6 to August 5, 2021. Written comments were received from six agencies. Three written comments were received from the public. All comments received were considered in determining the potential for significant environmental impacts.

Based on the information in the record, which is composed of the EAW for the proposed project, the comments submitted during the public comment period, the responses to comments, and other supporting documents, the City of St. Louis Park makes the following Findings of Fact and Conclusions.

## 2. Findings of Fact

### 2.1 Project Description

Sherman Associates Development, LLC is proposing to redevelop an approximately 7-acre site south of CSAH 25 and east of Beltline Blvd in St. Louis Park, Minnesota. The Beltline Station Development consists of three previously developed but currently vacant parcels that include paved and gravel parking lots, and existing right-of-way surrounded by manicured lawn, wooded area, and wetland. All previous buildings and parking areas have been demolished by the City of St. Louis Park and Southwest LRT construction contractors.

The mixed-use, transit-oriented development will be located immediately north of the Southwest LRT Beltline Blvd. Station, and 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 project will consist of four buildings:

- **Parking Ramp/Retail:** Located in the southwest corner of the site will be a 4-story parking structure with 560 parking spaces, including 268 spaces for park-and-ride purposes, and 1,800 square feet of ground floor commercial.
- **Building 1:** Located in the northwest corner of the site will be a 7-story, mixed-use building with approximately 20,000 square feet of ground floor grocery, approximately 159 units of multi-family housing above, and below grade parking.
- **Building 2:** Located in the northeast corner of the site will be a 4-story, residential building with approximately 84 units of affordable multi-family housing with below grade parking.
- **Building 3:** Located in the southeast corner of the site will be a 5-story residential building with approximately 160 units of market-rate, multi-family housing with below grade parking.

Construction will be conducted over two phases. Phase 1 is anticipated to begin in 2021 and includes Buildings 1 and 3 and the parking ramp. Phase 2 includes Building 2 and construction is anticipated to begin by the summer of 2022.

### 2.2 Corrections to the EAW or Changes to the Project since the EAW was Published

There have been no changes to the proposed project design since the EAW was published.

### 2.3 Agency and Public Comments on the EAW

During the comment period, the City of St. Louis Park received three written comments from the public and six written comments from the following agencies:

- Nancy Rose
- Friends of Bass Lake
- Center Point Energy

- State Historic Preservation Office (SHPO)
- Minnesota Pollution Control Agency (MPCA)
- Minnehaha Creek Watershed District (MCWD)
- Metropolitan Council
- Minnesota Department of Natural Resources (DNR)
- Minnesota Department of Transportation (MnDOT)

Consistent with state environmental rules, responses have been prepared below for all substantive comments received during the comment period. Original comments in their entirety are included in Appendix A.

### **1) State Historic Preservation Office (SHPO), August 2, 2021**

Comment: “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.”

Response: Comment noted.

### **2) Minnesota Pollution Control Agency (MPCA), August 3, 2021**

Comment: “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.”

Response: Thank you for your comment. An MPCA 401 Water Quality Certification has been added to the Permits and Approvals table in Section 2.4.3 and Section 8 of the EAW.

Comment: “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.”

Response: Comment noted.

Comment: “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.”

Response: As noted in Section 10 of the EAW, an NPDES permit is required because the project will disturb more than one acre of land. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared. All unpaved areas disturbed during construction will be revegetated in accordance with the standard NPDES permit requirements.

Comment: “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.”

Response: Comment noted. The stormwater management plans for the development will meet the stormwater management requirements of the City of St. Louis Park and the Minnehaha Creek Watershed District.

Comment: “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.”

Response: The project proposer will consider methods of volume reduction such as the use of a green roof as design advances.

Comment: “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](mailto:roberta.getman@state.mn.us).”

Response: Comment noted.

Comment: “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.

Response: The project proposer will conduct a Phase II Environmental Site Assessment prior to construction and will work with MPCA regarding contamination and cleanup of the project site as the site is redeveloped. If contamination is encountered, the State Duty Officer will be contacted.

### **3) Minnehaha Creek Watershed District (MCWD), August 3, 2021**

Comment: “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.”

Response: There will be additional vegetation planted as part of the project; however, the sentence on page 29 of the EAW should be revised to state that the project will increase impervious surface on the site. The proposed development will meet the stormwater management requirements of the City of St. Louis Park and the Minnehaha Creek Watershed District. The specific amounts of hardcover and urban tree canopy will be determined at a later date as the site design advances.



Comment: “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

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

Response: Comment noted. The proposed project will comply with the MCWD’s stormwater management rules.

Comment: “According to MCWD’s records, the MCWD approved a wetland delineation Boundary & Type determination for this parcel in December of 2020. 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.”

Response: Comment noted. The purchase of wetland banking credits is discussed within Section 11 of the EAW.

#### 4) Metropolitan Council, August 4, 2021

Comment: “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 that 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.”

Response: Comment noted. The City will continue to monitor growth and will coordinate with the Metropolitan Council regarding the TAZ forecasts for the area if any modifications are needed.

Comment: “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.”

Response: The developer will continue to coordinate with MCES regarding the dual forcemain interceptors.

Comment: “The Metropolitan Disposal System has adequate capacity for this project location.”

Response: Comment noted.

Comment: “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/>).”

Response: Comment noted. The City requires EV and EV ready infrastructure in all new and reconstructed parking.

Comment: “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.”

Response: Comment noted. The project proposer will continue to coordinate with the Metropolitan Council's contractors during construction of this project.

Comment: "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."

Response: Comment noted.

Comment: "The Metropolitan Council has reviewed the  $\frac{3}{4}$  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."

Response: Comment noted.

Comment: "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."

Response: The bus bay will be designed in accordance with Metropolitan Council requirements. Coordination between the City, Developer and Metropolitan Council will continue through design and construction of the Beltline Station Development.

Comment: "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."

Response: Vertical circulation will be designed in accordance with Metropolitan Council requirements. Coordination between the City, Developer and Metropolitan Council will continue through design and construction of the Beltline Station Development.

## **5) Minnesota Department of Natural Resources (DNR), August 5, 2021**

Comment: "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."

Response: Comment noted. This clarification has been added to the EAW and erosion control specifications will be addressed through permitting.

Comment: "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.”

Response: The developer will look for methods to minimize chloride use and improve treatment of stormwater runoff to minimize potential impacts to downstream waters. The project will comply with all City, watershed district, county, and state rules for stormwater management, and chloride use will be addressed in the Stormwater Management Plan that will be reviewed by the City for compliance.

Comment: “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.”

Response: Comment noted. As discussed in Section 11 of the EAW, a DNR Water Appropriation Permit may be needed and will be obtained by the developer/permit holder if dewatering above these volumes is required.

Comment: “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.”

Response: Comment noted. The project proposer will work with the City to complete a landscaping plan that incorporates these elements.

Comment: “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.”

Response: The proposer requested NHIS concurrence from the DNR on May 4, 2021. The comment letter received from the DNR on the EAW is attached in this Finding of Fact.

## **6) Minnesota Department of Transportation (MnDOT), August 5, 2021**

Comment: “MnDOT strongly recommends that Saint Louis Park require the developer to conduct a Traffic Impact Study—showing particularly how the development will impact

nearby MN highways 7 & 100. Due to the proximity of the Beltline development to the MN 100/MN 7 interchange ramps, there's a chance that traffic on CR25 could backup to the highway ramps and thus impact operations on both State highways. The developer needs to show that this won't be the case based on the project traffic operations in this area."

Response: Thank you for your comment. The traffic impact study included the northbound Highway 100 ramp. The distance between the northbound Highway 100 ramp and the project site provides approximately 1,550 feet of storage area between the two signals and the projected queues do not reach this distance. The eastbound and westbound directions of CSAH 25 are anticipated to operate acceptably and the longest eastbound queues along CSAH 25 in the build analysis scenarios would be around 500-550 feet, while the interchange is approximately 1,550 feet away. Therefore, queuing along CSAH 25 is not anticipated to impact the interchange or ramp operations. More details related to queues is available in the appendix of the traffic impact study in Attachment D of the EAW.

#### **7) Nancy Rose, August 5, 2021**

Comment: "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."

Response: Comment noted. Table 5 in Section 11 of the EAW should have stated the correct assessment ID number for Bass Lake in St. Louis Park, which is 270015.

#### **8) Friends of Bass Lake**

Comment: "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"

Response: Thank you for your comment. The Minnesota Environmental Quality Board is considering changes to the Environmental Review Program to address

climate change; however, these changes have not yet been implemented and guidance on how to evaluate a specific site or individual project's effect on climate change has not been finalized.

The proposed development will incorporate elements of sustainability as described in Section 20 of the EAW. Project-specific sustainability elements include providing green infrastructure and landscaping that will increase native vegetation and pollinator habitats and energy efficiency with performance functionality to achieve sustainable conservation and ongoing reduction of the project's carbon footprint. Additionally, the project proposer has developed solar arrays in the metro area to provide renewable energy to reduce the carbon footprint of new development.

#### 9) CenterPoint Energy, June 30, 2021

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

Response: Comment noted.

## 2.4 Decision Regarding Need for an Environmental Impact Statement

The City of St. Louis Park finds that the analysis completed for the EAW and the additional information considered in this document of findings of fact and conclusions are adequate to determine whether the project has the potential for significant environmental effects based on consideration of the four criteria identified in Minnesota Rules, part 4410, subpart 7.

### 2.4.1 Type, Extent and Reversibility of Impacts

The City of St. Louis Park finds that the analysis completed for the EAW is adequate to determine whether the project has the potential for significant environmental effects. The EAW described the type and extent of impacts to the natural and built environment anticipated to result from the proposed project. Based on the EAW analysis and mitigation commitments, the proposed project is not anticipated to result in substantial impacts. Below is a summary of the findings regarding the potential environmental impacts of the project are as follows:

- Land Use – The project will be compatible with nearby land uses and land uses planned in anticipation of the opening of the Southwest Light Rail Transit. A portion of the project is already guided for transit-oriented development (TOD).
- Soils and Topography – Soil borings indicate the site is suitable for development. Gentle slopes will result in relatively low erosion potential during construction.
- Water Resources – There is only one surface water, a wetland, located in the project area. The wetland impact is anticipated to be permanent, resulting from roadway/parking lot fill or building development. Wetland impacts will be tracked and replaced at a minimum of 2:1 replacement ratio with wetland replacement in accordance with Minnehaha Creek Watershed District requirements. It is anticipated that wetland bank credits will be used for replacement of the wetland impacts. 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.

- Wastewater - The City and regional wastewater system have the capacity to accept and treat the proposed wastewater from the project.
- Water - The City's water system can adequately serve the project.
- Stormwater Management - Stormwater management will be designed to meet the City and MCWD requirements. Stormwater discharges from the project will be cleaner than current water discharges and rates will be at or below existing discharge rates. During construction of the proposed development, best management practices of temporary stormwater management will be implemented.
- Wildlife and Habitat - One wetland will be impacted by the proposed development and may displace fish, wildlife, and plant communities within or nearby the wetland. It is not anticipated that rare features that will be impacted. The proposed development includes landscaping, parks, and stormwater retention areas that can provide habitat for wildlife and plant communities. This area will include a blend of biodiverse, native, drought-tolerant plant species that could provide pollinator habitat.
- Historic Resources - There are no known historic resources on site. No impacts to historic resources are anticipated as part of this development.
- Visual – The project will be visually similar to buildings in the surrounding area.
- Air – Emissions will be typical of residential/commercial development.
- Noise – Noise levels will be typical of residential/commercial development.
- Transportation – The traffic and parking study concluded that there is expected to be minimal impact from the proposed project on the local and regional transportation system. Additional sidewalk connections will improve non-motorized transportation.
- Light Rail Station – The site is noted to be adjacent to a Southwest LRT light rail station. The Beltline Station development will complement the transit functions in and around the site.

#### **2.4.2 Cumulative Potential Effects of Related or Anticipated Future Projects**

Cumulative effects result from the incremental impact of the proposed project when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. No cumulative potential effects are anticipated for this project. Overall, the project fits within the existing neighborhood. Given that the site has been previously developed and provides limited wildlife habitat, impacts are limited. The project can be served by existing utilities and transportation infrastructure.

#### **2.4.3 Extent to which the Environmental Effects are Subject to Mitigation by the Ongoing Public Regulatory Authority**

The mitigation of environmental impacts will be designed and implemented in coordination with regulatory agencies and will be subject to the plan approval and permitting process. Permits and approvals that have been obtained or may be required prior to project construction are shown below:

<b>Unit of Government</b>	<b>Type of Application</b>	<b>Status</b>
<b>Local</b>		
Minnehaha Creek Watershed District	Stormwater Management Permit	To be applied for
	Erosion Control Permit	To be applied for
	WCA Replacement Plan Approval	To be applied for, if needed
City of St. Louis Park	Preliminary and Final Plat	To be applied for
	Comprehensive Plan Amendment	To be applied for
	Preliminary and Final Planned Unit Development	To be applied for
	Right-of-way Vacation	To be applied for
	Building Permits	To be applied for
	Demolition Permits	To be applied for
	Public Right-of-Way permit	To be applied for
	Sewer and Water Permit	To be applied for
	Erosion Control Permit	To be applied for
	Dewatering Permit	To be applied for
<b>Regional</b>		
Metropolitan Council	Notification of intent to perform a demolition	To be applied for
	Construction Site Stormwater Permit	To be applied for
	Sewer Connection Permit	To be applied for
	Southwest LRT Project Office Coordination for access modification	To be applied for
Hennepin County	ROW Vacation	To be applied for
	Work in ROW Permits	To be applied for
	Driveway Modification	To be applied for
<b>State</b>		
Minnesota Department of Health	Notification of Asbestos Related Work	To be applied for
	Water Extension Permit	To be applied for
Minnesota Pollution Control Agency	Notification of intent to perform a demolition	To be applied for
	Construction Site Stormwater Permit	To be applied for
	National Pollutant Discharge Elimination System (NPDES) permit	To be applied for
	401 Water Quality Certification	To be applied for, if needed
Minnesota Department of Natural Resources	Water Appropriation Permit	To be applied for



<b>Unit of Government</b>	<b>Type of Application</b>	<b>Status</b>
Minnesota Department of Transportation	Driveway access permits and utility permits	To be applied for
<b>Federal</b>		
US Army Corps of Engineers	Section 404 Permit	To be applied for, if needed

#### **2.4.4 Extent to which Environmental Effects can be Anticipated and Controlled as a Result of Other Environmental Studies**

The City of St. Louis Park has previous multi-use development experience, and similar projects have been designed and constructed throughout the county. Design and construction staff are familiar with the project area. No problems are anticipated that city staff has not encountered or successfully solved previously in similar projects in or near the project area. The City finds that the environmental effects of the project can be anticipated and controlled as a result of environmental review and experience on similar projects.

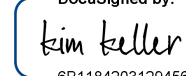
### 3. Conclusions

1. All requirements for environmental review of the proposed project have been met.
2. The EAW and the permit development processes related to the project have generated information that is adequate to determine whether the project has the potential for significant environmental effects.
3. Areas where potential environmental effects have been identified will be addressed during the final design of the project. Mitigation will be provided where impacts are expected to result from project construction, operation, or maintenance. Mitigation measures are incorporated into project design and have been or will be coordinated with state and federal agencies during the permit process.
4. Based on the criteria in Minnesota Rules, part 4410.1700, the project does not have the potential for significant environmental effects.
5. An environmental impact statement is not required for the proposed project.

For the City of St. Louis Park

DocuSigned by:  
  
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Jake Spano, mayor

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Kim Keller, city manager