

ENVIRONMENTAL ASSESSMENT WORKSHEET

Note to preparers: This form and EAW Guidelines are available at the Environmental Quality Board's website at: <http://www.eqb.state.mn.us/EnvRevGuidanceDocuments.htm>. The Environmental Assessment Worksheet provides information about a project that may have the potential for significant environmental effects. The EAW is prepared by the Responsible Governmental Unit or its agents to determine whether an Environmental Impact Statement should be prepared. The project proposer must supply any reasonably accessible data for — but should not complete — the final worksheet. The complete question as well as the answer must be included if the EAW is prepared electronically.

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:** Bennett Lumber Site Redevelopment

2. Proposer	JPG-OFP, LLC & Aurora-Uptown, LLC
Contact person	John Dietrich
Title	Project Manager
Address	c/o RLK Incorporated
Address	6110 Blue Circle Drive, Suite 100
City, state, ZIP	Minnetonka, MN 55343
Phone	952-933-0972
Fax	952-933-1153
E-mail	jdietrich@rlkinc.com

3. RGU	City of Minneapolis
Contact persons	Becca Farrar
Title	Senior Planner
Address	250 S. 4 th Street
	Room 300 Public Service Center
City, state, ZIP	Minneapolis, MN 55415
Phone	612-673-3594
Fax	612 673-2526
E-mail	rebecca.farrar@ci.minneapolis.mn.us

4. **Reason for EAW preparation** (check one)
 EIS scoping Mandatory EAW Citizen petition RGU discretion Proposer volunteered

If EAW or EIS is mandatory give EQB rule category subpart number and subpart name:
Residential Development – Subpart 19, D. Greater than 375 attached residential units.

5. **Project location**
County: Hennepin
City/Township: Minneapolis
Section-Township-Range: SE-SE ¼ Section 33, Township 29N, Range 24W

Property Addresses/Tax Parcel Numbers:

West Parcel: 2812 Emerson Ave. S (PID# 33-029-24-43-0120)
2828 Emerson Ave. S (PID# 33-029-24-43-0122)
1209 28th St. W (PID# 33-029-24-43-0009)

Central Parcel: 2820 Dupont Ave. S (PID# 33-029-24-43-0131)

East Parcel: 2828 Dupont Ave. S (PID# 33-029-24-43-0053)
2821 Dupont Ave. S (PID# 33-029-24-44-0055)
2825 Dupont Ave. S (PID# 33-029-24-44-0065)
2820 Colfax Ave. S (PID# 33-029-24-44-0054)
2824 Colfax Ave. S (PID# 33-029-24-44-0061)
2828 Colfax Ave. S (PID# 33-029-24-44-0062)
2836 Colfax Ave. S (PID# 33-029-24-44-0063)

GPS Coordinates

West Parcel: 44d 57' 03"N, 93d 17' 41"W
Central Parcel: 44d 57' 03"N, 93d 17' 38"W
East Parcel: 44d 57' 03"N, 93d 17' 33"W

Attach each of the following to the EAW:

- **County map showing the general location of the project;**
See Appendix – Figure 1.0 Location Map
- **U.S. Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries (photocopy acceptable);**
See Appendix – Figure 2.0 USGS Map
- **Site plan showing all significant project and natural features.**
See Appendices – Figure 3.0 Area Map, Figure 4.0 Concept Site Plan, and Figure 5.0 Zoning Map
Figure 6.0 CM&STP Grade Separation Historic District Map

6. Description

a. Provide a project summary of 50 words or less to be published in the *EQB Monitor*.

The proposed housing project would redevelop three former industrial parcels located in south Minneapolis between Colfax Avenue S and Fremont Avenue S and directly north of the Midtown Greenway. The total project area encompasses approximately 5.6 acres and could be developed with up to 710 residential units, which is only possible should the properties be rezoned and bonuses added for increased density. Each parcel will be developed independently. The first parcel to be developed is between Colfax and Dupont Avenues S and will have 230 units.

b. Give a complete description of the proposed project and related new construction. Attach additional sheets as necessary. Emphasize construction, operation methods and features that will cause physical manipulation of the environment or will produce wastes. Include modifications to existing equipment or industrial processes and significant demolition, removal or remodeling of existing structures. Indicate the timing and duration of construction activities.

The three parcels of the project site total approximately 5.6 acres of developable property. The project will be developed in phases and each parcel will be taken through the design and approval process independently. The project area encompass portions of the three blocks bounded by Colfax Avenue South, the Midtown Greenway, Fremont Avenue South, and West 28th Street (See Figures 2.0 and 3.0). Development of the parcel between Colfax and Dupont Avenues (East Parcel) is planned for construction in 2011 - 2012 with 230 units. The Central Parcel between Dupont and Emerson Avenues and the West Parcel between Emerson and Fremont Avenues will be developed in the future as the market supports and may add approximately 480 units. There is no time frame for the Central and West Parcels at this time. Refer to Figure 4.0 for a site plan of the project.

The East Parcel encompasses approximately 78,800 square feet of private property (1.8 acres) and an existing 12-foot wide, concrete public alley (approximately 2550 SF) that dead ends in the middle of the parcel. The redevelopment of the East Parcel will include up to 230 residential units in a building that ranges in height from 6 stories or 68 feet on the south end of the parcel to 4 stories or 54 feet on the north end (See Figure 4.0). The parking for the East Parcel will be provided in an underground garage which will have approximately 242 stalls and access and egress on Dupont Avenue.

As proposed, the dead end alley will need to be vacated and rerouted to Colfax Avenue. Public Works and Planning Staff shall review said vacation application in conjunction with the other land use applications needed for the site once applications have been formally submitted. Each parcel will be an individual project. Each project will require removal of the existing structures, excavation for below grade structures and construction phasing to build the structure with defined limits of construction within a developed urban neighborhood. Each parcel will have permanent underground stormwater chambers designed to meet the City and Watershed's requirements for water quality and rate control.

There are no plans or schedule for the redevelopment of the Central or West Parcels at this time. At the time of redevelopment all buildings in the Central Parcel will be demolished. The Central Parcel square footage is approximately 82,700 (1.9 acres) that may be redeveloped with approximately 250 units in a U-shaped building with a courtyard opening to the south towards the Midtown Greenway. The building heights could range from 68 feet on the south end of the parcel to 64 feet on the north end (See Figure 4.0). An underground parking structure with approximately 270 parking stalls below grade would serve all residential units of the Central Parcel. The access to the Central Parcel is anticipated to be on Dupont Avenue South at the northeast side of the parcel, opposite the access to the East Parcel.

At the time of redevelopment all buildings on the West Parcel are anticipated to be demolished. The West Parcel is L-shaped and is the only parcel which extends all the way from the Greenway to 28th Street. This parcel is approximately 1.9 acres in size and may be redeveloped with up to 230 units. The proposed building heights could range from 68 feet on the south end of the parcel to 54 feet on the north end (See Figure 4.0). An underground parking structure with approximately 238 stalls would serve the West Parcel, with access anticipated to be on Emerson Avenue.

The proposed density, height, configuration and other proposed components of each development shall be reviewed on a case-by-case basis and are subject to final City review and approval.

c. 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.

This project will be developed by a private developer. The objective is to design and construct housing developments which take advantage of and contribute to the transit, recreational, commercial and other amenities in the Uptown area of Minneapolis. The total project could provide up to 710 residential living units along the Midtown Greenway on land designated by the City for high-density housing. The proposed project will replace under-utilized industrial property, a lumber yard, vacant property, and dilapidated structures. A well-planned residential community will integrate the project into the public realm along the streets, with the Midtown Greenway (a regional trail corridor), and into the surrounding residential neighborhood. The developer will construct an extension of the Midtown Promenade on the north side of the Greenway west of Colfax to Dupont as part of the development of the East Parcel. Future development of the Central Parcel and West Parcels may provide opportunities for further extension of the Promenade and public access into the Greenway.

d. Are future stages of this development including development on any other property planned or likely to happen?

No.

If yes, briefly describe future stages, relationship to present project, timeline and plans for environmental review.

Not applicable.

e. Is this project a subsequent stage of an earlier project?

No.

If yes, briefly describe the past development, timeline and any past environmental review.

Not applicable.

7. Project magnitude data

Total project acreage:

5.6± Acres

Number of residential units:

Unattached: 0

Attached: 710 total units anticipated through independent development of the West, Central and East Parcels.

Maximum units per building: 250

Commercial, industrial or institutional building area (gross floor space): None

Indicate areas of specific uses (in square feet):

Office: 0

Manufacturing: 0

Retail: 0

Other industrial: 0

Warehouse: 0

Institutional: 0

Light industrial: 0

Agricultural: 0

Other commercial (specify): 0

Building height: Building height on all parcels will range from 50 to 54 feet/4 stories on the north side of the parcels to 68 feet/6 stories on the south side of the parcels. Figure 4 identifies the proposed site plan and the estimated stories and heights of the buildings.

If over 2 stories, compare to heights of nearby buildings:

East Parcel: To the north and northeast of the East Parcel are 2 and 2½-story duplex, triplex and single family homes. A 2½ story apartment is on the corner of 28th Street and Colfax Avenue. To the east of the East Parcel is a 4-story condominium building and townhomes between Colfax and Bryant Avenues. The 4 story building is approximately 52’ in height. South of the East Parcel, across the 100-foot wide Greenway corridor, is the 6-story Lehman Center (formerly Buzza Card Building).

Central Parcel: To the north and directly adjacent to the Central Parcel are two 3½-story, 4-level apartment buildings which front on 28th Street and with courtyards which open to 28th Street. These two apartment buildings have a surface parking lot directly adjacent to the north side of the Central Parcel. South of the Central Parcel, across the Greenway, is 29th Street which is not a public street and functions as the loading dock for a 1-story grocery. The grocery store site has been planned for redevelopment.

West Parcel: To the west and directly adjacent to the West Parcel are two 2½-story, 3 level apartment buildings. Parking lots for the apartments are located between the apartment buildings and the West Parcel. To the north of the West Parcel are 2-story duplex and triplex homes. Directly west of the West Parcel across Fremont Avenue is the ACME Tag site which has an approved development for residential at building heights of 84’. To the south of the West Parcel is the Greenway and across the Greenway is 29th Street. South of 29th Street is a 1 and 2-story industrial building with surface parking lots.

8. Permits and approvals required. List all known local, state and federal permits, approvals 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.

The following lists the primary permits and approvals needed for both phases of the project.

<u>Unit of Government</u>	<u>Type of Application</u>	<u>Status</u>
State: Pollution Control Agency	Sanitary Sewer Extension Permit	To be applied for

Registration permits for generators	To be applied for
NPDES	To be applied for
Development Response Action Plan	To be submitted
Other permits re Petroleum Brownfield Program	As required

Local:

Hennepin County Permit to grade in Greenway To be applied for to allow maintenance of the walls, planting and a potential bike access to the garage to be incorporated into the project.

City of Minneapolis

Mississippi River Watershed	Grading/Stormwater Permit	To be applied for
Public Works	Traffic Impact Study (TIS)	Draft plan available
	Grading/Erosion Control Plan	To be applied for
	Storm Water Management Plan	To be applied for
Planning Commission	Rezoning R-3 and R-5 to R-6	To be applied for
	Conditional Use Permits	To be applied for
	Variances	As required
	Site Plan Review	To be applied for
	Alley Vacation	To be applied for
	Travel Demand Management Plan	To be applied for
	Preliminary & Final Plat	To be applied for
Regulatory Services	Demolition Permit	To be applied for
	Building Permits and Utility Extension	To be applied for
Minnehaha Creek Watershed District	Grading/Stormwater Permit (East Parcel)	To be applied for

9. Land use. Describe current and recent past land use and development on the site and on adjacent lands. Discuss project compatibility with adjacent and nearby land uses. Indicate whether any potential conflicts involve environmental matters. Identify any potential environmental hazards due to past site uses, such as soil contamination or abandoned storage tanks, or proximity to nearby hazardous liquid or gas pipelines.

The East Parcel is currently vacant. The existing ground plane of the East Parcel is a bituminous parking area, a concrete public alley and grass. The west and southern portion of the parcel historically contained several manufacturing and warehousing buildings and uses. Two to three houses previously existed in the northeast area of the parcel. The most recent user, prior to demolition of the buildings, was the Bennett Lumber Company.

The Central Parcel has warehouse and storage type buildings along the street edges and a bituminous surface at a recessed elevation in the center of the site. The Central Parcel was historically used as a coal yard in the early 1900's and then as a lumberyard for Bennett Lumber Company. It is currently occupied by a vacant lumber yard, warehouse, and light manufacturing and storage buildings. Remodeler's Choice most recently operated a lumberyard and building materials supply business on the West and Central Parcels, but closed its operations in 2010. The remaining tenants of the Central Parcel are a light industrial and retail business that manufactures accessories for musical instruments and a building materials salvage business.

The West Parcel currently consists of a bituminous parking lot adjacent to 28th Street and buildings which were formerly a part of the Bennett Lumber warehouse, offices and an indoor lumber yard and loading facility which accessed Fremont Avenue. The buildings were most recently occupied by Remodeler's Choice and are now vacant. A public concrete alley abuts the west and north side of the L-shaped parcel. Norris Creameries operated on the West Parcel in the first half of the 1900's, prior to establishment of the Bennett Lumber use.

The project area is surrounded on the east, north and west by land that is residentially zoned and used for residential purposes. To the east of the East Parcel is a condominium building and townhomes between Colfax and Bryant Avenues. North of the East and Central Parcels there is a mix of single-family, duplex, and triplex homes and apartment buildings between the project area and 28th Street. Adjacent to the west on the same block as the West Parcel are apartment buildings. West of the West Parcel across Fremont Avenue is the ACME Tag site upon which construction of a 216-unit apartment building has recently begun. ACME was originally

approved at 8 stories or 84 feet in height and with 237 units; however, it has been reduced to a 6-story structure with 216 units. South of the project area is the Midtown Greenway. Land south of the Greenway is zoned and used commercially. The height of the proposed buildings will be designed to transition down to four stories along the north property lines into the established residential neighborhood. The project's compatibility with the City's approved land use plans and zoning regulations is discussed further in Section 27 of this EAW.

The Midtown Greenway is a regional bicycling and pedestrian trail that occupies the north half of the Hennepin County Regional Railroad Authority (HCRRA) property abutting the south property line of all three parcels of the project site. The Midtown Greenway connects to the City's lakes and the regional cycling routes of the Southwest, Cedar Lake, and Kenilworth Trail and extends east to the Mississippi River. The Midtown Greenway is a significant magnet for human powered activity while preserving a future transit corridor that bisects Minneapolis along 29th Street. The Midtown Greenway is also public open space with heavily landscaped edges and planned landscaped restorations, creating a green ribbon of a parkway through the city. The proposed development will be designed to integrate with the Midtown Greenway by extending the Midtown Promenade along the Greenway and providing access into the Greenway where feasible.

The Midtown Greenway trail is also located within the Chicago Milwaukee and St. Paul Railroad Grade Separation historic district, which is listed in the National Register of Historic Places. Portions of the East and West Parcels are also located within the historic district. The historically significant retaining wall visible from the Midtown Greenway of the recently removed Twin City Separator Company building (2837 Dupont Avenue) is still intact and will be preserved in the redevelopment of the East Parcel. The vertical wall separating the railroad trench from the building at 2828 Emerson on the West Parcel has also been identified as being associated with the historic district. The historic resources on and adjacent to the site are discussed further in Section 25.

Based upon review of a previous Phase I Environmental Site Assessment (ESA) for portions of the project area, asbestos, lead paint, or other hazardous materials may be present on site. Prior to the demolition of the on-site structures, a survey will inventory asbestos-containing materials, possible lead paint (disrepair), and other hazardous materials. All identified hazardous materials will be removed prior to demolition and will be disposed of properly according to state and federal requirements by a licensed contractor.

The results of the Phase II ESA indicate prior petroleum impacts to shallow soils at the site associated with former salvage yard operations on the central parcel. The petroleum-impacted soil will be managed according to a Development Response Action Plan (DRAP) to be prepared prior to demolition. The DRAP will be reviewed and approved by the Minnesota Pollution Control Agency (MPCA), Petroleum Brownfield Section. In addition to specifying the handling of known hazardous materials, the DRAP will contain a contingency plan with operating procedures if unanticipated hazardous materials are encountered.

10. Cover types.

Estimate the acreage of the site with each of the following cover types before and after development:

	Before	After		Before	After
Types 1-8 wetlands	0	0	Lawn/landscaping	1.0±	0.8±
Wooded/forest	0	0	Impervious surfaces	4.6±	4.8±
Brush/Grassland	0	0	Stormwater Pond	0.0±	0.0±
Cropland	0	0	Other	0.0±	0.0±
			TOTAL	5.6±	5.6±

If Before and After totals are not equal, explain why: Not applicable.

11. Fish, wildlife and ecologically sensitive resources

a. Identify fish and wildlife resources and habitats on or near the site and describe how they would be affected by the project. Describe any measures to be taken to minimize or avoid impacts.

The project site and surrounding area is an established single-family, multiple family and mixed-use industrial/commercial area that has been fully developed since the early twentieth century. With the exception of the adjacent Midtown Greenway, vegetation is limited to isolated small lawns. A turf grass lawn cover on

the East Parcel is a temporary condition following demolition of the buildings. The Midtown Greenway is a grade separated, former railroad corridor that has been converted to a recreational trail with an asphalt-paved trail for bicyclists and pedestrians. This corridor is also becoming a green spine through the city with an increase in landscaping that includes trees and shrubs. It is highly unlikely that significant wildlife or plant communities exist within the project area according to the Minnesota DNR Natural Heritage letter dated Nov. 12, 2010. (See Exhibit B)

b. Are any state-listed (endangered, threatened or special concern) species, rare plant communities or other sensitive ecological resources on or near the site? Yes

The DNR database did identify three items generally found within a mile of the project site. Two, being Vertebrate Animals (The Least Darter and the Pugnose Shiner), as species of special concern. These Vertebrate Animals are fish and will not be found on the site. The third is a vascular plant (Valerian); Valerian has been identified in the general vicinity and is typically found in moist lowlands or in hilly pasture areas. It is very doubtful Valerian will be found within these three former industrial parcels of property.

If yes, describe the resource and how it would be affected by the project. Describe any measures that will be taken to minimize or avoid adverse impacts. Provide the license agreement number (LA-___) and/or Division of Ecological Resources contact number (ERDB 20110172) from which the data were obtained and attach the response letter from the DNR Division of Ecological Resources. Indicate if any additional survey work has been conducted within the site and describe the results.

No additional survey work has been conducted.

12. Physical impacts on water resources.

Will the project involve the physical or hydrologic alteration — dredging, filling, stream diversion, outfall structure, diking, and impoundment — of any surface waters such as a lake, pond, wetland, stream or drainage ditch?

No.

If yes, identify water resource affected and give the DNR Public Waters Inventory number(s) if the water resources affected are on the PWI: Describe alternatives considered and proposed mitigation measures to minimize impacts.

Not applicable.

13. Water use.

Will the project involve installation or abandonment of any water wells, connection to or changes in any public water supply or appropriation of any ground or surface water (including dewatering)?

Yes.

If yes, as applicable, give location and purpose of any new wells; public supply affected, changes to be made, and water quantities to be used; the source, duration, quantity and purpose of any appropriations; and unique well numbers and DNR appropriation permit numbers, if known. Identify any existing and new wells on the site map. If there are no wells known on site, explain methodology used to determine.

The present properties are, and the proposed project will be connected to the City of Minneapolis water supply. Estimated water demand is based upon the Service Availability Charge (SAC) Procedure Manual (Metropolitan Council, Environmental Services, January 2004). One SAC unit (274 gallons per day representing peak day usage) is assigned to each residential unit. With the approximately 710 proposed residential units, the project would require an estimated 194,540 gallons per day for this entire project at build out.

The project will not involve drilling new wells and according to the Minnesota Department of Health – County Well Index no wells exist on-site.

The project will have no impact on sole source aquifers. The site is served by the Minneapolis Water Works, which draws its water supply from the Mississippi River under appropriation permit number 786216-1. Potable supplies are adequate to meet the needs of the project without modification to the existing system.

14. **Water-related land use management district. Does any part of the project involve a shoreland zoning district, a delineated 100-year flood plain, or a state or federally designated wild or scenic river land use district?**

No.

If yes, identify the district and discuss project compatibility with district land use restrictions.

15. **Water surface use. Will the project change the number or type of watercraft on any water body?**

No.

If yes, indicate the current and projected watercraft usage and discuss any potential overcrowding or conflicts with other uses.

Not applicable.

16. **Erosion and sedimentation. Give the acreage to be graded or excavated and the cubic yards of soil to be moved:**

5.6 acres

95,000± cubic yards

Describe any steep slopes or highly erodible soils and identify them on the site map. Describe any erosion and sedimentation control measures to be used during and after project construction.

The project site is currently three developed parcels that will require demolition and site grading. Erosion and sediment control practices will be implemented prior to demolition and site work to protect the downstream water bodies and conveyance systems. Site grading will include the excavation of the sites for underground parking, backfilling, underground stormwater chambers, and final grading. Excess material from the excavation of the underground parking will be exported from the site.

The East and West parcels are at street grade and are generally flat. The Central Parcel slopes to the south towards the Greenway. The proposed underground parking structures will be excavated to be below the adjacent streets to allow the first level of the proposed residential structures to be near street grade. Maximum slopes for the proposed project will be 3H:1V and vegetation will be established on these slopes with sod or erosion control blanket to prevent erosion of the slopes. Retaining walls may be necessary where grade differentials occur between the building and the street.

Soils in this area typically are sandy loams and are granular in nature and therefore are susceptible to erosion. A well developed Storm Water Pollution Prevention Plan (SWPPP) will be implemented by the contractor to minimize erosion on the site. The SWPPP will be prepared per the Minnesota Pollution Control Agency (MPCA) - National Pollutant Discharge Elimination System (NPDES) Permit and will be included in the plan development package received by the City and in the Construction Documents. The plan will specify erosion and sediment control practices to be utilized during construction to minimize the potential for stormwater pollution. Temporary Best Management Practices (BMP) including protection of street-level storm water inlets, perimeter silt fences, crushed rock construction entrances, and periodic street sweeping will be utilized. Permanent erosion and sediment controls, such as vegetation establishment, will be implemented into the plan to ensure long term stability of the site. Stormwater treatment facilities will also be designed and implemented to meet City, Watershed and MPCA requirements. The applicant will be required to obtain an MPCA – NPDES

Permit as well as a City of Minneapolis Erosion Control Permit, which enforces the City's erosion control ordinance. These permits will help ensure the implementation of best management practices for erosion and sediment control during construction.

17. Water quality: surface water runoff

a. Compare the quantity and quality of site runoff before and after the project. Describe permanent controls to manage or treat runoff. Describe any stormwater pollution prevention plans.

The project site consists of three parcels that are located between Fremont Avenue S and Colfax Avenue S. The East Parcel is located within the Minnehaha Creek Watershed District, while the West and Central Parcels are located within the jurisdiction of the Mississippi River Watershed Management Commission. The City of Minneapolis is the LGU for the Mississippi River Watershed District. Therefore the parcels will have two different requirements for stormwater rate control and quality.

To obtain a building permit, the applicant must obtain approval from the City for a Storm Water Management Plan, which, among other measures, would require treatment of 100 percent of the on-site storm water during construction and removal of 70 percent of the suspended solids. Permanent storm water management measures, required under Title 3, Chapter 54 of the Minneapolis City Code, are not yet designed for the project, but will be implemented to meet the City requirements.

The existing parcels are considered developed but are in various states of use from vacant property to marginally utilized buildings and hard surface areas. The East Parcel, which recently had existing structures and impervious surface areas removed, presently has 1.0± acres of impervious area (56% coverage). The Central Parcel has 1.8± acres of impervious area (95% coverage) and the West Parcel has 1.8± acres of impervious surface (95% coverage). Runoff from each of the existing parcels flows into either the public streets adjacent to the site or into the Midtown Greenway without any form of treatment or rate control.

The proposed parcels will be designed to meet the requirements of the Watershed District in which they are located and the City's stormwater management ordinances. These requirements will include reducing the proposed runoff to at or below existing rates and providing on-site treatment to reduce total suspended solids and phosphorous. Best management practices required to achieve these requirements have not yet been designed, but will follow the requirements of the governing Watershed District and the City. The proposed impervious coverage for the parcels will meet City requirements. All coverage ratios will be detailed and approved as the site plans are submitted to the City. Considering the nature of the existing site and lack of treatment and stormwater rate control, the proposed design of the three parcels will likely reduce the rate of runoff and improve the water quality entering the public storm sewer system.

Stormwater pollution prevention plans will meet MPCA requirements as well as the regulations of the governing Watershed District and by the City. These prevention plans will include, but are not limited to, rock construction entrances, stormwater inlet protection devices and silt fence around the perimeter of the site.

b. Identify routes and receiving water bodies for runoff from the site; include major downstream water bodies as well as the immediate receiving waters. Estimate impact runoff on the quality of receiving waters.

Stormwater runoff from the three parcels will flow into the public storm sewer system within the adjacent streets and ultimately into the Mississippi River. Stormwater runoff rates and quality from the three proposed parcels will be in accordance with the regulations of the governing Watershed District and the City. Based on the nature of the existing sites and the lack of existing stormwater management, the proposed designs will likely improve the water quality of stormwater entering the public storm sewer system from the three parcels.

18. Water quality: wastewaters

a. Describe sources, composition and quantities of all sanitary, municipal and industrial wastewater produced or treated at the site.

Estimated sanitary wastewater produced at the site from residential uses would be about 194,540 gallons per day, based on estimated water consumption (section 13). The development is not expected to produce any wastewater that requires special treatment.

b. Describe waste treatment methods or pollution prevention efforts and give estimates of composition after treatment. Identify receiving waters, including major downstream water bodies (identifying any impaired waters), and estimate the discharge impact on the quality of receiving waters. If the project involves on-site sewage systems, discuss the suitability of site conditions for such systems.

Sanitary sewer services from the proposed development will connect to the City of Minneapolis existing sanitary sewer mains along Colfax, Dupont, Emerson and Fremont Avenues.

c. If wastes will be discharged into a publicly owned treatment facility, identify the facility, describe any pretreatment provisions and discuss the facility's ability to handle the volume and composition of wastes, identifying any improvements necessary.

Wastes will be discharged to the Metropolitan Waste Water Treatment Plant. The Metropolitan Plant has a capacity of 251 million gallons per day, it discharges to the Mississippi River and it utilizes advanced secondary treatment with chlorination/dechlorination. The Metro Plant has the ability to handle the volume and composition of the sanitary waste discharged from the site.

19. Geologic hazards and soil conditions

a. Approximate depth (in feet) to ground water:

9.5 feet minimum depth. The depth to water was measured through geological borings on site. The groundwater under the site appears to represent a local, non-continuous perched water table. The Geologic Atlas, Hennepin County, Minnesota, County Atlas Series Atlas C-4, N.H. Balaban, 1989 estimates a depth to the buried glacial aquifer at approximately 45 feet below grade.

to bedrock:

250' to 400' depth, 325' average. The Geologic Atlas, Hennepin County, Minnesota, County Atlas Series Atlas C-4, N.H. Balaban, 1989, indicates bedrock high to the west of the site with depth to bedrock (Prairie Du Chein group – Dolostone) at approximately 325 feet below grade.

Describe any of the following geologic site hazards to ground water and also identify them on the site map: sinkholes, shallow limestone formations or karst conditions. Describe measures to avoid or minimize environmental problems due to any of these hazards.

Based on published data, it is not anticipated that sinkholes, shallow limestone formations, or karst conditions exist immediately below the project area.

No hazards to groundwater are anticipated related to the proposed construction.

b. Describe the soils on the site, giving NRCS (SCS) classifications, if known. Discuss soil texture and potential for groundwater contamination from wastes or chemicals spread or spilled onto the soils. Discuss any mitigation measures to prevent such contamination.

Soils in the project area are generally composed of coarse alluvium (SP, SW, SP-SM), fine alluvium (ML), and till (SC, CL). Currently, low concentrations of petroleum impacts have been identified in the shallow soil at the site. Based on the presence of a consistent till layer at depth of 9.5 to 24 feet below grade, it appears that wastes or chemicals spread or spilled onto the soil within the project area would be limited to the surficial soils.

20. Solid wastes, hazardous wastes, storage tanks

a. Describe types, amounts and compositions of solid or hazardous wastes, including solid animal manure, sludge and ash, produced during construction and operation. Identify method and location of

disposal. For projects generating municipal solid waste, indicate if there is a source separation plan; describe how the project will be modified for recycling. If hazardous waste is generated, indicate if there is a hazardous waste minimization plan and routine hazardous waste reduction assessments.

Hazardous materials due to past site uses that may be or are present on the site are identified in the Phase I and Phase II ESAs and are discussed in more detail in Section 9 of this EAW, as is the process that will be used to further identify, manage and dispose of such materials. Hazardous wastes identified at the site will be removed prior to demolition by a certified contractor. Demolition of the existing site buildings will create demolition waste, which will be disposed of at an appropriate demolition landfill permitted to accept such waste. Construction activities will generate construction wastes, which will be handled and disposed of at appropriate, permitted disposal facilities. Under a contingency plan, if additional hazardous waste is identified during demolition, the work will be stopped, and the appropriate contractors will be contacted for removal and disposal.

No hazardous wastes are anticipated to be generated during construction. After occupancy, it is estimated that each residential unit will generate about 50 pounds of solid waste per week or weekly solid waste generation of about 35,500 pounds for the entire 5.6 acre site and annual solid waste generation of 923 tons for the whole site. Private haulers under contract to the City will provide municipal solid waste (MSW) collection and recycling program services. The City and Hennepin County maintain award-winning recycling programs that recover over 30 percent of the waste stream. The County also recovers much of the embedded energy in the MSW through its garbage incinerator.

b. Identify any toxic or hazardous materials to be used or present at the site and identify measures to be used to prevent them from contaminating groundwater. If the use of toxic or hazardous materials will lead to a regulated waste, discharge or emission, discuss any alternatives considered to minimize or eliminate the waste, discharge or emission.

No toxic substances are anticipated to be stored or used in significant quantities during construction or during occupancy of the structure. Hazardous materials, such as fuels and certain construction materials, will be on site during construction and will be stored and handled in conformance with regulatory requirements.

c. Indicate the number, location, size and use of any above or below ground tanks to store petroleum products or other materials, except water. Describe any emergency response containment plans.

An underground storage tank (UST) that was used to store fuel oil was previously located on the Central Parcel. This UST has been removed. Although impacts have not been identified with the former location of the UST, a contingency plan will be included in the DRAP to manage petroleum impacts if identified during construction activities. It is anticipated that small quantities of fuel will be stored on site during construction activities by individual contractors. If spills occur, the contractor will contact the appropriate authorities based on the quantity of the spill, and the appropriate response action will be completed.

21. **Traffic.**

Parking spaces added:

Net 750 total stalls added. 238 stalls are planned on the West Parcel, 270 stalls are planned on the Central Parcel and 242 stalls are planned for the East Parcel. The parking ratio for the East Parcel will be 1.1 stalls for each unit. The parking ratio for the total project is estimated at 1.07 stalls per unit.

Existing spaces (if project involves expansion):

Not Applicable

Estimated total average daily traffic generated:

Maximum daily traffic generated is expected to be 2,876 trips at full projected build-out.

Estimated maximum peak hour traffic generated and time of occurrence:

At full build-out with the projected 710 units, maximum peak hour traffic generation is expected to be 213 vehicles for the AM peak hour and 277 vehicles for the PM peak hour.

Indicate source of trip generation rates used in the estimates.

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. Using the format and procedures described in the Minnesota Department of Transportation's Traffic Impact Study Guidance (available at: <http://www.oim.dot.state.mn.us/access/pdfs/Chapter%205.pdf>) or a similar local guidance, provide an estimate of the impact 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.

The Bennett Lumber Site Redevelopment Project (Proposed Project) is a residential development located in the Lowry Hill East Neighborhood of Minneapolis. The first phase of the project will be completed by 2012. Upon full completion of the development, the Proposed Project will include up to 710 residential units. As part of the Proposed Project, RLK Incorporated completed a Traffic Impact Study, see Exhibit A. As each phase of the project is submitted for land use approvals, a Travel Demand Management Plan (TDMP) will be prepared.

Analysis Scenarios and Key Intersections

To identify or quantify traffic impacts incurred by the Project, the following three scenarios were evaluated:

- *Year 2010 Existing*
- *Year 2015 No-Build*

The existing land use, which consists primarily of a building material lumber yard, will be removed. In addition, ten planned land developments in the vicinity of the site were included in the background analysis for the traffic impact report. The 10 planned land developments are identified below.

- *Year 2015 Build*

Proposed land use includes 710 residential dwelling units and the ten planned land developments. The year 2015 was the selected date for the completion of all three phases for the project for planning purposes only. It should be noted that only the East parcel has a development time frame associated with it. The lumber yard and the associated buildings will be removed.

In order to determine discernable impacts to the regional transportation system, and with concurrence from the City of Minneapolis, the following key signalized intersections were evaluated:

- West Lake Street/Lagoon Avenue and Dupont Avenue South
- Lagoon Avenue and Emerson Avenue South
- West Lake Street and Emerson Avenue South
- West 28th Street and Emerson Avenue South
- West 28th Street and Dupont Avenue South
- Lagoon Avenue and Hennepin Avenue South

Planned Developments and Signal Timing Improvements

As part of the assumed 2010 Existing Traffic Volumes are trips from the following redevelopments that are now in place: These five in place projects are five of the 10 planned projects previously referenced.

- Midtown Lofts
- (Tract 29)
- Lumen on Lagoon
- LynLake Aldrich (Blue) Apartments
- The Murals (2833 Lyndale)

Some additional redevelopment projects which were assumed to have been completed by 2010 remain in process. Nevertheless, it is assumed that the following projects will be completed by the time the Bennett Lumber Redevelopment project is complete, assuming a completion date of 2015. Therefore, trip generation from the following parcels is preserved in the analysis: The following five projects are the balance of the ten projects previously referenced as being included in the traffic analysis.

- Calhoun Square Redevelopment
- Lake/Lagoon and Dupont Office (current name 1800 Lake)
- 2900 Lyndale Mixed Use Development
- The Mozaic Development
- Acme Tag Site (current name Flux Apartments)

Signal Timing Improvements: Previous TDM plans had suggested that signal timings be updated along the Lake Street/Lagoon Avenue Corridor. These timings have now been updated by the City of Minneapolis, and these new timings are in place today.

As a standard practice, it is recommended that the City monitor traffic signal timings as developments change along corridors. As new developments are completed, and new traffic patterns evolve, traffic volumes and signal operations should be assessed for any fine-tuning of signal timings in the area.

Existing Traffic Volumes: Over the past five years, there have been several TDM plans and traffic analyses done in the Lowry Hill East/Uptown area. These analyses used 2010 as the No-Build versus Build year for their traffic impact studies. These analyses also included the impacts of various background developments in their traffic projections.

In late summer 2010, RLK Incorporated conducted peak hour turning movement counts at selected intersections in the area. The results of these turning movement counts show that the 2010 No-Build traffic volumes projected in the previous studies at these nearby intersections were slightly greater than the 2010 actual turning movement volumes recorded at selected intersections. Therefore, rather than recount the intersections in the study area, RLK requested that the City of Minneapolis allow the 2010 No-Build traffic projections be utilized in the current studies as a "worst case" for 2010 Existing Condition Traffic Volumes. The City of Minneapolis concurred.

Forecast 2010 No-Build Traffic Volumes: To remain consistent with previous studies completed for the Uptown area, an annual background growth rate of one percent (1%) was used for this study.

In addition to the annual background growth rate, site-generated traffic from several nearby redevelopment projects expected to be completed by 2010 were included in the 2010 No-Build conditions as directed by the City. The site-generated traffic, assuming the respective distribution throughout the study area as detailed in each of the associated Travel Demand Management Plans (TDMPs), was incorporated in the 2010 No-Build conditions. Figure 4 in the traffic section, Exhibit A, illustrates the location of these nearby redevelopment projects with respect to the proposed site.

The one percent per year background growth rate and the estimated planned developments trip generation were applied to the existing traffic volumes to obtain the forecast year 2015 No-build volumes.

Forecast 2015 Build Traffic Volumes: The volume of vehicle trips generated by the proposed redevelopment was estimated for the weekday AM and PM peak hours using the data and methodologies contained in the 8th Edition of Trip Generation, published by the Institute of Transportation Engineers (ITE). The estimated volume of site-generated trips for the AM Peak hour is 213 and 277 for the PM peak hour with a weekday average daily traffic estimated to be 2,876 trips.

The distribution of site-generated traffic to and from the adjacent street system is consistent with previous TDM Plans completed in the vicinity of the proposed site.

Traffic Impact Study: A Traffic Impact Study was conducted for each of the identified key intersections for the AM and PM peak hours. The following summarizes the procedure and results of the traffic operation analysis completed for the Proposed Project.

Level of Service: The results of the traffic analysis included approximating the intersection delay. This capacity analysis, or measure of delay, is reported in the terms of Level of Service (LOS), which is the qualitative indicator of traffic impact. By definition, LOS A conditions represents high quality of traffic flow (i.e., little

delay) and LOS F conditions represent poor quality of traffic flow (i.e., extreme traffic delays and congestion). The LOS D/E boundary is typically used as the indicator of congestion in an urban area.

Analysis and Results: Traffic operations for peak hour conditions within the study area were analyzed using the industry-standard Synchro/SimTraffic 6 software package, which uses the data and methodology contained in the 2000 Highway Capacity Manual, published by the Transportation Research Board. The software model was calibrated using existing conditions before being used to assess future conditions. The existing signal timing parameters obtained from the City of Minneapolis were used for the 2010 Existing scenarios. Existing signal timing parameters were also used for the 2015 No-Build and 2015 Build scenarios.

Results of the operational analyses indicate that most study area roadways and intersections will continue to operate acceptably without improvements for the Build scenario, assuming the City updates and implements optimized signal timings within the study area on a regular basis.

These findings represent a “worst case” trip generation for the study area. Background traffic was based on a 1.0% annual growth rate, whereas the economic slowdown has limited development growth. Many recent studies have utilized 0.5% annual growth rate to better replicate less aggressive traffic growth. Likewise, with the adjacent Midtown Greenway and Uptown Transit Station, there are multiple transportation options available to the future residents of the Bennett Lumber Redevelopment. Combined with proposed traffic demand management strategies, 2015 traffic impacts under the Build condition will be mitigated.

No modifications are necessary to the adjacent roadway network.

Traffic Control Devices: As a standard practice, it is recommended that the City monitor traffic signal timings as developments change along corridors. As new developments are completed, and new traffic patterns evolve, traffic volumes and signal operations should be assessed for any fine-tuning of signal timings in the area.

Parking: The existing East and Central parcels currently contains zero off-street parking spaces, while the West Parcel contains 84 off-street parking spaces associated with the former Remodeler’s Choice store. With the Proposed Project, the East Parcel will provide 254 stalls, the Central Parcel will provide 270 stalls and West Parcel will provide 238 off-street underground resident-only parking stalls, respectively, resulting in a total of 762 stalls.

Existing on-street parallel parking will remain. Opportunities for additional on-street parking will be incorporated adjacent to the development, as feasible.

The Proposed Project will be providing adequate parking to meet the City of Minneapolis Zoning Code requirements of one parking space per dwelling unit for residential development.

Site Access Points: The Proposed Project will provide access to the East and Central Parcel underground residential parking approximately mid-block along Dupont Avenue. The West Parcel underground residential parking will be accessed at a mid-block location on Emerson Avenue. Both Emerson Avenue and Dupont Avenue are Collector classified roadways. Both the East and Central Parcels currently have three driveway access points to the adjacent streets. The West Parcel currently has two access points onto Emerson, one access point onto 28th Street and one large access driveway onto Fremont. All access points will be removed and consolidated to one new access point for each parcel.

Pedestrians: Pedestrian traffic generated as a result of the Proposed Project is expected to be consistent with the character of the surrounding urban environment, a residential development and the Uptown area. Adequate pedestrian crossing protection is provided at signalized intersections located one block north and south of the Proposed Project site.

Construction: While the Proposed Project is under construction, periodic disruption to the adjacent parking lanes along Fremont Avenue, Emerson Avenue, Dupont Avenue and Colfax Avenue may be required. Every attempt necessary will be made to minimize the impact to adjacent traffic lanes.

Travel Demand Management Plan: A Travel Demand Management Plan (TDMP) plan will be completed with each phase of the Bennett Lumber Redevelopment and will be a component of the Land Use Applications. The TDMP will include the strategies the developer will commit to in order to reduce traffic and support alternative modes of transportation. As each phase of the Bennett Lumber project is designed, the access points, traffic and circulation, and TDMP strategies will be prepared for Public Works approval, complete with a signature page. The goal of the TDMP is to identify workable strategies that developers/property owners can implement in support of the City of Minneapolis transportation goals.

22. **Vehicle-related air emissions. Estimate the effect of the project's traffic generation on air quality, including carbon monoxide levels. Discuss the effect of traffic improvements or other mitigation measures on air quality impacts.**

Based upon the Traffic Impact Study for the project all intersections studied will be operating at acceptable levels of service. The anticipated new traffic generated for this project over and above the traffic which was previously attracted to the industrial properties will not create congestion at the intersections in the am or pm peak periods. Violations of the local or state air quality standards are not anticipated as a result of this project.

23. **Stationary source air emissions. Describe the type, sources, quantities and compositions of any emissions from stationary sources of air emissions such as boilers, exhaust stacks or fugitive dust sources. Include any hazardous air pollutants (consult *EAW Guidelines* for a listing) and any greenhouse gases (such as carbon dioxide, methane, nitrous oxide) and ozone-depleting chemicals (chloro-fluorocarbons, hydrofluorocarbons, perfluorocarbons or sulfur hexafluoride). Also describe any proposed pollution prevention techniques and proposed air pollution control devices. Describe the impacts on air quality.**

The natural gas heating and cooling systems are expected to consist of individual furnace/air conditioning systems for each residential unit. No adverse impacts to air quality are expected as a result of the project.

24. **Odors, noise and dust. Will the project generate odors, noise or dust during construction or during operation?**

Yes.

If yes, describe sources, characteristics, duration, quantities or intensity and any proposed measures to mitigate adverse impacts. Also identify locations of nearby sensitive receptors and estimate impacts on them. Discuss potential impacts on human health or quality of life. (Note: fugitive dust generated by operations may be discussed at item 23 instead of here.)

Odors: The construction and occupancy of the project is not expected to generate objectionable odors.

Construction noise: The Minneapolis Code of Ordinances regulates both the hours of operation for construction equipment and allowable noise levels. Construction of the project will comply with these requirements.

Operational noise: The Minneapolis Code of Ordinances and the MPCA regulate mechanical noise associated with building operation. The occupancy of the project will comply with these requirements.

Demolition and construction dust: During demolition and construction, contractors will follow best management practices to reduce dust emissions. During demolition, this will include wetting down the building site and debris with hoses as necessary.

Fugitive dust emissions after occupancy: Once occupied, the project is not expected to generate fugitive dust emissions.

25. **Nearby resources. Are any of the following resources on or in proximity to the site?**
Archaeological, historical or architectural resources? Yes.
Prime or unique farmlands or land within an agricultural preserve? No.
Designated parks, recreation areas or trails? Yes.

Scenic views and vistas? No.

Other unique resources? No.

If yes, describe the resource and identify any project-related impacts on the resource. Describe any measures to minimize or avoid adverse impacts.

Historic Resources

This section describes the historic resources within and adjacent to the project area and discusses potential impacts that might result from the project.¹

Overview

In 2005 the Chicago, Milwaukee and Saint Paul Railroad Grade Separation historic district was listed on the National Register of Historic Places. This historic district overlays the current Midtown Greenway and includes portions of the project site. (See Figure 6 for a map of the historic district in the vicinity of the project site.) The Chicago, Milwaukee and Saint Paul Railroad Grade Separation historic district period of significance extends from 1912 to 1916.

Historic Significance

The project site is partially located within the boundary of the Chicago Milwaukee and St. Paul Railroad Grade Separation historic district. The Benton Cutoff of the railroad's Hastings and Dakota branch was completed across south Minneapolis, just north of 29th Street, between 1879 and 1881. Although the area was sparsely populated at the time, it was not long before problems emerged at the numerous intersections of the railroad tracks and city streets. After years of agitation by politicians and citizens, the railroad finally agreed to depress the tracks.

Between 1912 and 1916, the railroad eliminated thirty-seven grade crossings by excavating a trench almost three miles long, extending from Hiawatha Avenue on the east to Irving Avenue on the west. A series of reinforced-concrete bridges carried city streets over the trench.²

The Chicago Milwaukee and St. Paul Grade Separation Historic District with the ornate bridges and depressed grade was agreed upon in design by citizens, city government, and city planners based in large part because of its aesthetics and design that blended in within the surrounding area. The depressed grade was a more attractive option compared to an above ground rail line or at grade.

The debate over the form of the grade separation, therefore, extended over several years. That the importance of the resolution of this debated lay in the areas of city planning and urban aesthetics is indicated by the creation of the Civic Commission of Minneapolis during the period of the debate, one of whose main goals was to address grade separation in the context of a comprehensive civic plan; the hiring of Edward H. Bennett, a leader of the City Beautiful Movement, to preside over this commission and design the civic plan; and the final design of the H and D line grade separation project, approved by the City Council and the Civic Commission as a depressed rail corridor with ornamental bridge.

The rail corridor had been well developed by a variety of industrial businesses by the time the tracks were depressed. Because 29th Street edged the south side of the corridor for much of its length, most of the affected businesses were on the north side. To address the physical and functional needs of these businesses, the railroad developed a side track edging one or both sides of the main line to link with industry spurs. Owners of industrial businesses along the tracks had to adapt their properties to the new grade. Like many other

¹ The most up-to-date evaluation of above-ground resources associated with the East Parcel is provided by Charlene Roise, "Historical Evaluation: Twin City Separator Company Property, 2841 Dupont Avenue South, Minneapolis, Hennepin County, Minnesota," March 2008, prepared by Hess, Roise and Company for Bennett Investment Partners, LLC. Archaeological information is included in a report by Andrew J. Schmidt and Andrea C. Vermeer, "Historical and Archaeological Assessment, Bennett Lumber Property Redevelopment," 2005, prepared by Summit EnviroSolutions for Sherman Associates, both reports are available upon request at the Planning Division offices in Room 210, City Hall.

² Unless otherwise indicated, the following sources were used for this section: "Track Depression at Minneapolis," 514-517; "Track Depression Work of the C.M. & St. P. Ry. at Minneapolis." *Railway Review* 57 (July 17, 1915): 69-73; C.N. Bainbridge, "A Large Track Depression Project at Minneapolis," *Railway Age Gazette*, December 2, 1915, 1059-1063.

businesses, the owners of the Twin City Separator Company (2837 Dupont Ave. S) elected to extend the foundations of their buildings to form a retaining wall, which served as an edge for the depressed corridor.

The Chicago, Milwaukee and St. Paul Railroad Grade Separation historic district was listed in the National Register of Historic Places in 2005. The designation acknowledges the district's historical significance (Criterion A) in community planning and development, with a period of significance extending from 1912 to 1916. (National Register Designation Form, 2005)". The District is also considered eligible for local designation under local designation Criterion 3: The property contains or is associated with distinctive elements of city or neighborhood identity and Criterion 5: The property exemplifies a landscape design or development pattern distinguished by innovation, rarity, uniqueness or quality of design or detail.

Key contributing elements in the district include the trench, the bridges built to carry street traffic over the trench, and the buildings / sites that edge the trench. Almost none of the buildings contribute to the district because they have been substantially altered and no longer retained historic integrity, or because they date from after the district's period of significance.

East Parcel

The southwest portion of the East Parcel is within the historic district (see figure 6). In 2005 when the designation of the Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District was listed the Twin City Separator building (2837 Dupont Ave. S.) was identified as a contributing factor. The buildings existing on the southwest side of the site were also included in the district as potentially contributing to the historical district. A key element of the Twin City Separator Building contributing to the historical district is the foundation wall which was extended during the period of significance (1912-1916.). Between 2005 and 2008 all of the buildings except for the Twin City Separator building were removed from the site, the Twin City Separator building was the last remaining building on the east parcel and was continually slipping deeper into a state of disrepair from vandalism and theft of structural timbers.

The Twin City Separator Company Building was a two-story, brick industrial building built between 1906 and 1909. The Twin City Separator Building was a contributing building to the Chicago, Milwaukee, and Saint Paul Railroad Grade Separation historic district, which is listed on the National Register of Historic Places but not designated locally. The building was worthy of local designation as a landmark because of its association with distinctive elements of city identity and for being an example of a rare/unique landscape design per local designation Criterion 3 and 5. The Twin City Separator Building was the last existing contributing building to the historic district. The integrated south building wall of the Twin City Separator Company Building, which still remains, served as the trench retaining wall/vertical plan of the railroad corridor.

A complete application for Demolition of Historic Resource for the demolition of the Twin City Separator building was submitted on July 12, 2010. The Applicant stated that the Twin City Separator Building was beyond repair and that demolition was necessary to correct an unsafe condition. For the Demolition of Historic Resource application, the Applicant stated that no future plans were proposed for the site. On July 26, 2010, the Heritage Preservation Commission approved the demolition of the Twin City Separator Building based in part on the Applicant providing a structural analysis that stated that the building was beyond repair. A draft environmental assessment worksheet was submitted for a new 710 unit development four months after the HPC decision allowing demolition.

The Heritage Preservation Commission approved the demolition of the Twin City Separator Building with four conditions of approval. The Applicant has complied with the Conditions of Approval 1, 2 and 3 and the 4th condition, of adding an interpretive sign panel, is in the design stage by Hess Roise Historical consultants. Condition number 1 indicates that the southern basement wall of the Twin City Separator building shall be retained and secured. This wall has remained intact during the building demolition.³ The HPC conditions of approval for the demolition specify that the foundation/retaining wall adjacent to the Greenway be retained and secured (Exhibit C). The foundation/retaining wall has been stabilized and will be preserved as a component of the property's redevelopment.

³ Minnesota Historic Properties Record HE-MPC-3502 Twin City Separator Building, Hess Roise, December 27, 2010.

Central Parcel

The Central Parcel, which has been altered substantially during the past century, was not included in the Chicago Milwaukee and St. Paul Railroad Grade Separation historic district. The property served as a coal yard for the Philadelphia and Reading Coal and Iron Company during the historic district's period of significance. There are no plans for development of the Central parcel at this time.

West Parcel

The southern portion of the West Parcel is included in the historic district as a non-contributing property. The Minnesota History/Architecture Survey Form obtained from the State Historical Preservation Office (SHPO) (Survey # MG-84) indicates that the building at 2828 Emerson was constructed after the period of significance and is not contributing to the historic district (Exhibit D). However, the property is associated with the historic district in that it helps to define the vertical plane of the trench. The vertical wall defining the trench will be reviewed in detail at the time plans are prepared to move forward with the development of the West parcel, at which time the City and HPC staff will be notified. There are no plans for development of the West parcel at this time.

Impacts

The proposed development must consider the potential for affecting both above and below-ground cultural resources. A study completed in 2005 concluded that there was little potential for finding significant archaeological resources within the East or Central Parcels.⁴ The potential for archaeological resources within the West Parcel has not been studied; however, the inclusion of the southern portion of the West Parcel in the historic district does not appear to be based on archaeological interest. Because planning for redevelopment of the West Parcel is not imminent and because the HPC has the authority to review applications for demolition of buildings on the West Parcel, further investigation of the potential archeological resources on the West Parcel could be conducted in association with future demolition and development plans when such plans become more concrete.

The southwest portion of the East Parcel is within the Chicago, Milwaukee, and St. Paul Grade Separation Historic District. With the buildings removed on the East Parcel the only visible historic element associated with the district on that parcel is the retaining wall along the corridor. The wall was stabilized when the Twin City Separator building at 2837 Dupont above street-grade was demolished. If the retaining wall were removed, the effect on the district would be adverse. The wall has been stabilized and will remain intact.³

The Colfax and Fremont Avenue Bridges are two of the four bridges adjacent to the project area that carry streets over the trench. The Colfax and Fremont bridges were erected during the period of significance and retain sufficient historic integrity to be contributing structural elements in the district. The bridges at Dupont and Emerson Avenues were built in the 1980s and are noncontributing. The proposed development will not affect the historic Colfax or Fremont Avenue bridges. These bridges will be reviewed as the construction of the individual parcels are undertaken to protect them from large numbers of trucks and construction traffic.

In addition to individual structures, the impact to the corridor as a cultural landscape must be considered. Future development that is within a National Register historic district, such as the proposed project, should look to the Secretary of Interior Guidelines for Setting and to the Guidelines for the treatment of Cultural Landscapes when analyzing how future development will impact the historic district. In addition, development should review the cultural landscape management and treatment guidelines that the Hennepin County Regional Railroad Authority (HCRRA) has developed for the historic district. However, these guidelines apply only to activities over which the railroad authority has jurisdiction.

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. The Secretary of the Interior's Standards outline four treatments: preservation, rehabilitation, restoration, and reconstruction. The rehabilitation treatment is the most appropriate

⁴ Citation to Schmidt and Vermeer 2005 report.

choice in a situation where change is inevitable (eliminating preservation of the status quo as an option) and the property's significance does not justify restoration or reconstruction. The guidelines for setting identify specific areas for analyzing landscapes. These apply to the proposed project as follows:

- *Spatial Organization and Land Patterns:* The proposed project if it is built to 64-68 feet in height in its proposed location will have an adverse visually impact on the historic district's setting, feeling, and association. A character-defining feature of the historic district is the 22-foot deep trench through which the railroad passed. As stated in the National Register nomination form, The Chicago Milwaukee and St. Paul Grade Separation Historic District's depressed grade was agreed upon in design by citizens, city government, and city planners based in large part because of its aesthetics and design that blended in within the surrounding area. The depressed grade agreed upon in the early part of the 20th century was a more attractive option compared to an above ground rail line or at grade. With the project's proposed 64-68 feet height, attention to those within the trench will be redirected vertically to the height of the proposed building rather than the trench itself, thus going against the original intent of the district. A recently constructed building that was able to reduce adverse impact on the district is the Midtown Lofts located to the east of the subject parcel. The Midtown Lofts is a four-story condominium that is approximately 52 feet in height and setback approximately 30 feet from the parcel's southern property line. If the proposed project on the East Parcel emulated the Midtown Lofts' building setback, number of stories, and height for at least one structural bay, the development would not be as overpowering for those enjoying the Midtown Greenway. The proposed construction of the project will not affect the historic retaining wall of the Twin City Separator Building along part of the south edge of the East parcel.
- *Topography:* The historic retaining wall will be preserved; the proposed development will retain the physical relationship that has historically existed between the trench, a vertical wall edging the East and West Parcels and a slope between the trench and street grades in the Central Parcel. The Twin City Separator building created a 2 story wall on top of the remaining retaining wall at the southwest corner of the east parcel.
- *Vegetation:* Plans for the landscaping have not been fully developed, but the landscaping will not cause an adverse effect if it takes its inspiration from the vernacular character of the volunteer landscape that has historically typified the corridor.
- *Circulation:* The proposed development will not affect historic circulation patterns. The proposed project has no plans to change or impact the bridges over the Greenway.
- *Water Features:* There were no water features on the parcels historically and none are being proposed.
- *Structures, Furnishings, and Objects:*
 - *East Parcel:* Plans for the East Parcel have been schematically drawn and reviewed conceptually at neighborhood meetings. The plans call for a U-shaped building mass with three separate buildings which will open to the south toward the Midtown Greenway. An opening to both Colfax and Dupont will allow the three structures to be integrated with a common plaza and open to the public streets and greenway. The historic wall will be preserved and incorporated into the development and the existing modular block wall will be retained along the east side of the parcel. The parking will be placed below grade and a public promenade will be incorporated along the top of the retaining walls overlooking the Greenway. The two southern buildings will be 64 - 68 feet in height and the north building will be 50 - 54 feet in height. The building's height along the trench is taller than most of the industrial facilities that edged the historic corridor during its period of significance. The proposed building will be set back from the vertical wall of the trench and is proposed to provide a public space; the building on the East Parcel is proposed to be setback approximately 30 feet from the south property line. The building would be six stories in height and will have a façade filled with windows, patio doors and a mix of quality exterior materials. The south façade will appear as two distinct buildings to reduce the mass of the taller structure on the historic trench. The 64 - 68 foot height, is comparable to two new developments along the corridor including the Murals Development at Lyndale Avenue (approved at 71 feet) and the Acme Tag site at Fremont, however, neither of these projects were within the boundaries of the Chicago, Milwaukee, and St. Paul Grade Separation Historic District (please see *Spatial Organization and Land Patterns* section for review of new construction impact on the historic district). Specific design issues, such as building materials, are not yet available for the East Parcel development.
 - *Central Parcel:* The plan for the Central Parcel is schematic to date and comprises a modified U-shaped building with the openings facing south towards the historic rail corridor. The site's slope,

which presumably dates from the property's use as a coal yard during the period of significance, may be retained. The building height along the corridor is planned for 64 - 68 feet. These heights are taller than the historical industrial buildings but they are similar to other new developments along the corridor.

- *West Parcel:* The plan for the West Parcel is schematic to date and the L-shaped lot will require a more linear placement for the structures. The buildings along the Greenway are proposed to be in the 64 - 68 foot height and the north building will be in the 50-54 foot height range.
- *Accessibility Concerns:* Access to the Greenway directly from the project site has not yet been determined. On the East Parcel there is a possibility to have a direct access to the garage for pedestrians and bikes through the existing modular block wall existing on the southeast side of the parcel. An access will be pursued to the greenway as the development plans for the East parcel become more defined. The Central Parcel offers a topographically compatible site for a connection to the Greenway. The west parcel with the existing vertical wall defining the trench offers fewer options. Any new connections to the Greenway will be reviewed with the City and HCRRA. The HCRRA will have to permit any private connections to the greenway.
- *Environmental and Energy Considerations:* There do not appear to be any preservation issues in these areas at this point in the design development.

By their size, the new buildings will have a visual effect on the Chicago Milwaukee and St. Paul Railroad Grade Separation historic district. To minimize this effect, the massing / height along the southern portion of the project, setbacks of the building, possible setbacks within the footprint of the building, and form of the buildings and the selection of exterior materials will be critical.

Designated parks, recreation areas or trails

The Midtown Greenway corridor is adjacent to the proposed project immediately to the south. The corridor is a former railroad grade running along 29th Street from Lake Calhoun in the west to the Mississippi River in the east. The railroad bed is currently owned by the Hennepin County Regional Railroad Authority (HCRRA), which maintains paved recreational trails as well as right of way intended for future transit use. Access to the Midtown Greenway is at Bryant Avenue South which is one block east of the project. The proposed extension of a public promenade along the north edge of the Greenway and addition of direct access to the recreational trail where feasible will enhance the use and enjoyment of the recreational trail. There are no adverse traffic, noise, air quality, or visual impacts expected from the proposed project on this recreational resource.

26. **Visual impacts. Will the project create adverse visual impacts during construction or operation? Such as glare from intense lights, lights visible in wilderness areas and large visible plumes from cooling towers or exhaust stacks?**

No.

If yes, explain.

Not applicable.

27. **Compatibility with plans and land use regulations. Is the project subject to an adopted local comprehensive plan, land use plan or regulation, or other applicable land use, water, or resource management plan of a local, regional, state or federal agency?**

Yes

If yes, describe the plan, discuss its compatibility with the project and explain how any conflicts will be resolved. If no, explain.

The following describes the goals, policies, and zoning regulations adopted by the City of Minneapolis that is applicable to the site and the project and evaluates the project's consistency with them.

a. The Minneapolis Plan for Sustainable Growth (adopted by the City Council in October, 2009):

The *Minneapolis Plan for Sustainable Growth* (the "Plan") is the City's Comprehensive Plan. This Plan is a guide for the future development and redevelopment of the City of Minneapolis. The Plan outlines the goals and objectives for the City to follow as land use considerations are brought forth by the public and private sector. It outlines the interrelationships of land use, transportation, housing, economic development, public services and facilities, environment, parks and open spaces, heritage preservation, arts, culture and urban design. The intent of the Plan is to balance opportunities and promote a high quality of life for City residents and visitors.

The Plan classifies the future land use of the project area as "Urban Neighborhood," which is a predominantly residential area with a range of densities, with highest densities generally to be concentrated around identified nodes and corridors. Not generally intended to accommodate significant new growth, other than replacement of existing buildings with those of similar density." Plan, p. 1-8. According to the Plan, the subject parcels are located near several Commercial Corridors, the Uptown Activity Center and the Lyn-Lake Activity Center. The policies and implementation steps outlined in the Plan promote the development of medium and high density housing in areas within and near Commercial Corridors and Activity Centers.

b. Uptown Small Area Plan (adopted by the City Council in February, 2008):

The *Uptown Small Area Plan* ("USAP") provides policy guidance for land use and development in the area generally surrounding the Uptown Activity Center, along the Lake Street and South Hennepin Avenue Commercial Corridors, and along the Midtown Greenway between Humboldt Avenue and Bryant Avenue. The project site is within the character area described as Urban Village (North Sub-area). The USAP guides the majority of the project site for future development with high density housing (50-120 DU/acre) and for Urban-Oriented Development Density (building types ranging from live/work units to 5-story loft style buildings). Three lots at the edge of the project area are zoned R-3 and guided for medium density housing (20-50 DU/acre): 2812 Fremont and 1209 28th Street at the north end of the West Parcel and 2820 Colfax Avenue at the northeast corner of the East Parcel (collectively the "North Lots"). The USAP guides the North Lots for medium density housing (20-50 DU/acre) and Neighborhood-Oriented Development Density (building types ranging from detached homes to small (4-story) courtyard apartment buildings. Preferred building heights in the Urban Village are three to five stories, with some opportunities for buildings up to 84 feet on major corridors.

The USAP includes several guidance statements relevant to the project area:

- The Plan proposes the majority of new growth to occur in the Core of Uptown (the Activity Center and the Urban Village). This area of Uptown can accommodate the most growth because there is ample vacant and underutilized land and it is the area of Uptown best served by transit. USAP, p. 47.
- North of the Greenway, new development should be residential only as the purpose should be to infill underutilized properties with high and medium density housing that transition to the neighborhood. USAP, p. 55.
- The Greenway will be an important component of the Urban Village. New high-density housing should line the north side of the Greenway and extend to approximately mid-block between 28th Street and the Greenway. Buildings north of the Greenway should be of a smaller scale than those south of the Greenway in order to provide transitions into the lower density residential areas (see page 76). Buildings on the Greenway should either engage the Greenway at the lower level or they should be set back 15' at the street level of the Greenway to create a promenade. USAP, p. 57.
- Instead of a single height limit across the Core of Uptown, this Plan recommends a sculpted building envelope that responds to the area's unique conditions. USAP, p. 75. Per the diagram on page 76 of the USAP, the sculpted building envelope for the half block area north of the Greenway is 56 feet.

c. The Midtown Greenway Land Use and Development Plan (adopted by the City Council in February, 2007):

The *Midtown Greenway Land Use and Development Plan* sets policy direction for land use and development along the Midtown Greenway corridor. It designates future land use for the majority of the project site for high-density housing. The *Midtown Greenway Land Use and Development Plan* was one of the first plan documents adopted to discuss the transition of the industrial property between Hennepin Avenue and Lyndale Avenue to be medium to high density housing. The plan places emphasis on developing sites to integrate pedestrian circulation and access to the Greenway, public transit and the commercial corridors.

d. Zoning Code:

The present zoning designation of the majority of the three parcels is R-5 Multiple-family District, with the exception of the three North Lots which have an R-3 Multiple-family District designation (see Figure 5.0). As shown in figure 5 there are a variety of zoning districts within this area of Minneapolis. The R5 district which encompasses the majority of the Bennett Parcels is a relatively new designation. The current zoning on the parcels was instituted within the past two years. Previous zoning districts on the parcels were a combination of industrial (I-2), medium density (R3 and R-5) and high density residential (R-6). The zoning in the area is a result of the City of Minneapolis implementing the land use guide plan and anticipating an area for increased density within the Uptown Activity Area. The following is a brief description of the R-3, R-5 and R-6 zoning districts:

The R3 Multiple-family District is a medium density district intended to provide an environment of predominantly single and two-family dwellings, cluster developments and smaller multiple-family developments. The maximum Floor Area Ratio ("FAR") without bonuses is 1.0 and the minimum lot area per dwelling unit ("MLA") without bonuses is 1,500 SF. The density will allow 29 dwelling units/acre (29 DU/acre). The maximum height allowed is 2½ stories or 35 feet.

The R5 Multiple-family District is intended to provide an environment of high density apartments, congregate living arrangements and cluster developments. The maximum FAR without bonuses is 2.0 and the MLA without bonuses is 700 SF/DU (62 DU/acre). The maximum height allowed is 4 stories or 56 feet.

The R6 Multiple-Family District is also intended to provide an environment of high density residential, below 120 dwelling units per acre, to very high density, above 120/ dwelling units per acre, when bonuses are applied. The maximum FAR without bonuses is 3.0 and the MLA without bonuses is 400 SF/DU (109 DU/acre). The maximum height allowed is 6 stories or 84 feet.

Existing Zoning Comparison Chart

The 5.6 acre study area includes R-3 zoned property at 11.5 % and R-5 property at 88.5 %. R-3 is identified as a multiple family district and was to be a buffer between the high density R-5 and the single and two family homes to the North of the project area. The existing zoning of R-3 and R-5 on a parcel by parcel basis would generally provide the following intensity of development without bonuses.

The following table generally describes the existing development intensity of the existing project area:

	West Parcel	Central Parcel	East Parcel	Total (Avg.)
Site Area	1.9 acre	1.9 acre	1.8 acre	5.6 acre
R-3 Area in sf	23,040 sf	-	5,140 sf	28,180 sf
R-3 Housing (1500 sf per unit)	15	-	3	18 units
R-5 Area in sf	59,724	82,764 sf	73,268 sf	215,756 sf
R-5 Housing (400 sf per unit)	85	118	104	307 units
Total Housing Units	100	118	107	325 units
Parking	164	206	186	325 spaces
Building Cover Average	67%	70%	69%	69%
Impervious Average	79%	85%	83%	83%
Building Height	2.5 story (35') to 4 story (56')			
Dwelling Units Per Acre	52.6	56.8	57.2	55.5

Bonuses may be obtained to increase both the FAR and MLA densities by 20% for providing enclosed parking and by 20% for providing qualifying affordable housing. Projects which are part of a Planned Unit Development (“PUD”) may also qualify for a 20% density increase (referred to as an “alternative” in the PUD ordinance). Building height can be increased over the limits in the district regulations through either a conditional use permit or a PUD alternative.

e. Consistency with land use plans and zoning regulations:

Development of high density housing in the project area is generally consistent with the City’s land use guidance for properties north of the Midtown Greenway between Lyndale and Hennepin Avenues. More specifically, city plans call for infill development of the historically-industrial, partially-vacant Bennett Lumber parcels with new high density housing. The city zoning ordinance defines the regulations for each district and sets standards for the setbacks, lot coverage, building heights and density per unit. Bonus credits to increase density are allowed for flexibility in how a proposed development is to be composed. The proposed Bennett Lumber redevelopment will request the existing zoning be changed to an R-6 zoning district to allow for the 710 units to be constructed on the three parcels which encompass 5.6 acres. As proposed the 710 units in buildings ranging from 50 feet on the north to 68 feet on the south would result in an average density of 126 units per acre. Densities greater than 120 units per acre are defined as very high density and will require a zoning district of R-6 and bonuses to achieve the proposed density. Development of very high density housing as proposed on the R-3 lots on the north end of the West Parcel and the northeast lot of the East Parcel is not consistent with the City’s guidance of the property and may require an amendment to the City’s future land use map. The R-3 lots were recently rezoned from I-2 to R-3 in order to implement the guidance of the USAP. Development of the R-5 zoned parcels with housing at a very high density of over 120 units per acre is not consistent with the City’s guidance of property on the three parcels. The East Parcel has a composed site development plan which suggests higher density and six story buildings with smaller foot prints and increased landscaped areas as the model for the Central and West Parcels. There are no near-term plans to proceed with redevelopment of the Central or West Parcels.

Evaluation of an application to amend the land use guidance for that portion of the West Parcel sometime in the future could reconsider the USAP guidance in light of the specific development proposal, the trend of development in the area and the City, and any other factors that may be relevant to the City’s policy decision at that time.

The following table generally describes the intensity of the proposed project:

	West Parcel	Central Parcel	East Parcel	Total
Site Area	1.9 acres	1.9 acres	1.8 acres	5.6 acre
Housing Units	230	250	230	710
Housing Floor Area (sf)	228,000	249,700	220,000	697,700
Commercial (sf)	0	0	0	0
Parking spaces	238	270	254	762
Building Coverage (%)	70% max.	70% max.	70% max.	70% max.
Impervious Surface (%)	85% max.	85% max.	85% max.	85% max.
Bldg Height/Floors	50'-68'/4-6	50'-68'/4-6	50'-68'/4-6	50'-68'/4-6
Dwelling Units/Acre	121	132	128	127

Please note that the information contained in this chart assumes a rezoning to R-6 and one density bonus/PUD bonus. Refer to the 2 charts on the following page for a comparison of the R-5 & R-6 Zoning districts.

The above chart outlines the building coverage and impervious surface coverage that are the maximum in both the R-5 and R-6 zoning districts.

Both R-5 and R-6 are considered high density zoning classifications. Any density which suggests a density greater than 120 units/acre is considered very high density. The following tables show the development potential under R-5 and R-6 zoning with bonuses and compares it to the proposed project.

The following table compares the R-5 zoning regulations and the proposed project:

	R-5	R-5 w/ Bonus 1*	R-5 w/ Bonus 1 and 2*	R-5 w/ Bonus 1, 2 and PUD Alternative*	Proposed Bennett Redevelopment
Site Area	5.6 acres	5.6 acres	5.6 acres	5.6 acres	5.6 acres
Housing Units	348	417	486	555	710
Housing Floor Area (sf)	487,872	585,446	683,020	780,594	697,700
Building Coverage (%)	70%	70%	70%	70%	70% max.
Impervious Coverage (%)	85%	85%	85%	85%	85% max.
Building Height	56'	56'	56'	56'	50'-68'

The following table compares the R-6 zoning regulations and the proposed project:

	R-6	R-6 w/ Bonus 1*	R-6 w/ Bonus 1 and 2*	R-6 w/ Bonus 1, 2 and PUD Alternative*	Proposed Bennett Redevelopment
Site Area	5.6 acres	5.6 acres	5.6 acres	5.6 acres	5.6 acres
Housing Units	609	730	851	972	710
Housing Floor Area (sf)	731,808	878,169	1,024,530	1,170,891	697,700
Building Coverage (%)	70%	70%	70%	70%	70% max.
Impervious Coverage (%)	85%	85%	85%	85%	85% max.
Building Height	84'	84'	84'	84'	50'-68'

*Bonus 1 is the Parking Bonus and Bonus 2 is the Affordable Housing Bonus, per Minneapolis Zoning Code. Potential bonuses and PUD Alternative equal 20% of the maximum number of units and FAR limits of the zoning district.

Even if the project was able to achieve two density bonuses and a PUD alternative, the allowable number of units under R-5 zoning would be limited to 555 units, which is much less than the 710 units proposed for the project. Under R-6 zoning, the proposed density could be achieved with a single density bonus. As proposed, the project will be significantly below the number of dwelling units achievable with bonuses and PUD alternative in an R-6 District. R-6 zoning would also allow the proposed building heights up to 68 feet without a conditional use permit. The proposed maximum project height of 68 feet is less than the R-6 height limit of 84 feet.

The developers believe that the proposed density of 127 DU/acre is necessary to finance a high quality development that incorporates desirable features and amenities for both residents and the public. The East parcel which is in the design phase, anticipates in exchange for a higher building (six stories) and density of units (128/ acre) a building footprint that will occupy 53% of the site vs. 75% of the site and the impervious percentage is 74% vs. 85%. The amount of landscape area on the East parcel is estimated to be 55% of the site not occupied by a building vs. 20% as required in the zoning code. Public amenities would include the extension of the Midtown Promenade and enhanced access into the Greenway trench, which promote the goals of the *Midtown Greenway Plan* and the USAP.

The project area is within the “Core of Uptown” for which the USAP proposes the majority of new growth to occur. Some statements in the USAP and the City’s recent decision to rezone the parcels to R-5 indicate a preference to encourage the greatest density south of the Greenway and a lesser degree of high density north of the Greenway. However, the Bennett project parcels are the largest development parcels available in the Core and are located on the north side of the Greenway. City plans also promote higher density development along major corridors, typically defined as Hennepin Avenue, Lake Street and Lyndale Avenue. The project area is also in close proximity to several street corridors (Lyndale, Hennepin, Lake, Lagoon) and land use features (Uptown Activity Center, Lyn-Lake Activity Center, Uptown Transit Center and the Midtown Greenway) that are intended to support, and be supported by, high density housing.

The traffic impacts of the proposed density have been studied (see Appendix A) and the adjacent intersections will all perform at acceptable levels. The proposed 710 units and the distribution of the vehicular traffic will allow the project as proposed to be absorbed into the existing street network without changing any intersections level of service.

Development of each parcel will require the proposer to apply for and obtain zoning approvals including rezonings, conditional use permits for multiple-family dwellings or a PUD, variances, site plan review, vacations and platting. The City will evaluate the applications for compliance with City plans and zoning regulations in the context of the specific project proposal. The City has the ability to regulate and mitigate the impacts of the proposed project through the zoning review.

28. Impact on infrastructure and public services. Will new or expanded utilities, roads, other infrastructure or public services be required to serve the project?

No.

If yes, describe the new or additional infrastructure or services needed. (Note: any infrastructure that is a connected action with respect to the project must be assessed in the EAW; see *EAW Guidelines* for details.)

Not applicable.

29. Cumulative potential effects. Minnesota Rule part 4410.1700, subpart 7, item B requires that the RGU consider the "cumulative potential effects of related or anticipated future projects" when determining the need for an environmental impact statement.

Identify any past, present or reasonably foreseeable future projects that may interact with the project described in this EAW in such a way as to cause cumulative potential effects. (Such future projects would be those that are actually planned or for which a basis of expectation has been laid.)

Describe 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 (or discuss each cumulative potential effect under appropriate item(s) elsewhere on this form).

The Traffic Analysis has included all potential developments (both completed and approved) in the area, which may be completed by 2015. The Traffic Analysis studied the cumulative impact of this project on the intersections under review. The Traffic Analysis suggests that no additional geometric improvements will be necessary to the public streets. Traffic signal timing will need to be adjusted as the area wide developments

come on line.

Municipal sewer and water systems have sufficient capacity to accommodate the proposed project, along with past, present and future development.

No cumulative impacts are identified or anticipated with the project as proposed.

30. **Other potential environmental impacts. If the project may cause any adverse environmental impacts not addressed by items 1 to 28, identify and discuss them here, along with any proposed mitigation.**

None.

31. **Summary of issues. Do not complete this section if the EAW is being done for EIS scoping; instead, address relevant issues in the draft Scoping Decision document, which must accompany the EAW.**

List any impacts and issues identified above that may require further investigation before the project is begun. Discuss any alternatives or mitigative measures that have been or may be considered for these impacts and issues, including those that have been or may be ordered as permit conditions.

Consistency of the proposal with local comprehensive plans and zoning regulations.

The project outlined in the EAW identifies a residential project which if approved as described would change the zoning to an R-6 district vs. the existing R-5 and three lots of R-3. The USAP documents discuss densities of 50-120 units per acre as high density residential. The zoning districts clearly outline specifics of building height, setbacks, building coverage and open space percentages. As development is brought forward of the properties within the EAW study area, they should be evaluated against the approved plans and zoning and be made to make the argument for a project which is considered outside the normal building envelope. This EAW has identified a project which will require an R-6 zoning district and the analysis has reviewed this level of intensity for the infrastructure, traffic, parking, etc. The analysis from a traffic and infrastructure analysis indicates that the intensities of the proposed project can be accommodated. Building height, open space, architectural composition, landscape and public realm interactions should be further studied in specific land use applications to gauge the value of modifying the in place land use regulations for the specific projects being proposed.

Rezoning of the Property Necessary for Project

The subject 5.6 acre site will require rezoning to an R-6 District and a very high density classification. The rezoning will be one of the land use applications to be considered as a part of the proposed project as each parcel is proposed for development. The City will further evaluate how the proposed rezoning complies with City policies and goals through the land use development application. It will be the applicants responsibility to prepare a complete application which will clearly demonstrate that a development which requires an R-6 zoning district is a better product overall for the area and City vs. a development which does not require rezoning to proceed.

Site Plan Approval and Conditional Use Permits

The land use approvals required for the project will include Site Plan Review, Conditional Use Permits, variances, platting, a vacation and a complete application accepted by the City prior to undertaking any change to the existing properties. The process will require submission of detailed plans and public hearings at the Planning Commission. This open review of the project will allow the City officials and stakeholders to understand the proposed project including its specific heights, number of dwelling units, placement of the structures, building materials proposed and traffic impacts. The City can deny or approve the applications with conditions to mitigate project impacts.

The land use approval process in Minneapolis is an established and open process that encourages comment from the public, provides for comment by professional staff, and results in decisions by local officials.

Comprehensive Plan

The proposed project is not consistent with the comprehensive plan which generally defines the area as a

combination of high density residential and medium density residential. The 5.6 acre site includes both R-3 and R-5 zoning districts. The proposal to have all of the property in an R-6 category may require the City and the Metropolitan Council to amend the existing land use plan to allow the plans to be consistent with the proposed project.

Impact to the National Register Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District.
As previously mentioned the Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic district received designation in 2005. The historic district stresses to capture physical and cultural elements which are from the designated period of significance defined as 1912 to 1916. The retaining wall from the Twin City Separator building will be preserved as a significant physical element of the significant period. A panel will be erected and placed within the Midtown Greenway, the current recreational use within the Historic district. Visual impacts of the proposed development on the Historic District is a potential issue and needs to be considered as the future buildings are placed along the edge of the trench. Landscaping of the upper edge of the trench and setting the building location back from the edge of the trench will reduce the visual impact of the new development. The height of the proposed structures at six stories will also present a potential impact to the historic corridor. Setting the building back from the trench edge will also reduce the visual intrusion of the proposed building on the historic corridor.

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 9b and 60, respectively.
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature:

Date: March 4, 2010

Rebecca D. Farrar

Title: Senior City Planner

Environmental Assessment Worksheet was prepared by the staff of the Environmental Quality Board at the Minnesota Department of Administration, Office of Geographic and Demographic Analysis. For additional information, worksheets or for *EAW Guidelines*, contact: Environmental Quality Board, 658 Cedar St., St. Paul, MN 55155, 651-201-2492, or <http://www.eqb.state.mn.us>