

EXHIBIT J

Record of Decision

THE VILLAGE, LLC REDEVELOPMENT EAW

City of Saint Anthony Village

January 19, 2016

Prepared by:

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Memorandum

To: *Honorable Mayor and City Council, City of Saint Anthony Village*

CC: *Breanne Rothstein, WSB & Associates, Inc.*

From: *Alison Harwood, WSB & Associates, Inc.*

Date: *January 19, 2017*

Re: *The Village, LLC Redevelopment
Environmental Assessment Worksheet
WSB Project No. 2170-380*

The public comment period for the proposed The Village, LLC Redevelopment Environmental Assessment Worksheet (EAW) ended January 4, 2017. The purpose of the EAW is to identify potential environmental impacts and determine whether or not an Environmental Impact Statement (EIS) is required. An EIS is a more extensive environmental review process. Determining whether or not an EIS is needed does not relate to providing approval or denial for the project.

Enclosed, please find the following items for your review relating to this EAW:

- The Record of Decision and Findings of Fact on the need for an Environmental Impact Statement (EIS).
- A summary of the review agencies comments received on the EAW and the responses to those comments. This section responds to each review agency issue.

Summary of Major Comments

Comments were received from the US Army Corps of Engineers (USACE), Metropolitan Council, Minnesota Pollution Control Agency (MPCA), Minnesota Historical Society (SHPO), and Hennepin County. These comments were general in nature. The Metropolitan Council comments have either been addressed or will be addressed during the City of Saint Anthony Village's Updated to the 2040 Comprehensive Plan. The Hennepin County comments have either been addressed or will be addressed during the revised traffic study or the preliminary plat review. The SHPO, MPCA, and USACE did not raise significant issues.

City Council Decision Action

The decision before the City Council regarding the EAW is to decide whether or not the project has the potential for significant environmental impacts that cannot be addressed through the permitting processes. If the Council determines that the project does not have the potential for these significant environmental impacts, the Council should issue a Negative Declaration of Need for an EIS. If the Council determines that the project does have the potential for significant environmental impact that cannot be addressed through the permitting and approval process, the Council should require an EIS. Based on the review completed by WSB & Associates, it is our recommendation that an EIS is not needed for this project.

If you have any questions, please feel free to call me at (763) 231-4847.

I. ADMINISTRATIVE BACKGROUND

Pursuant to Minnesota Rule 4410.4500, the City of Saint Anthony Village has prepared an Environmental Assessment Worksheet (EAW) for the proposed The Village, LLC Redevelopment. This Record of Decision addresses State of Minnesota environmental review requirements as established in Minnesota Rule 4410.1700. Continental Property Group is the project proposer for this project. The City of Saint Anthony Village is the Responsible Governmental Unit (RGU).

The EAW was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comments to the required EAW distribution list. A Notice of Availability for the initial EAW was published in the EQB Monitor on December 5, 2016. Notices of Availability and Press Releases were published in the *St Anthony Bulletin* on December 7, 2016.

The public comment period ended January 4, 2017. Comments were received from the US Army Corp of Engineers (USACE), Metropolitan Council, Minnesota Pollution Control Agency (MPCA), Minnesota Historical Society (SHPO), and Hennepin County. All comments were considered in determining the potential for significant environmental impacts. Summaries of the comments received, and the City of Saint Anthony Village's responses to those comments, are provided in Section III, below.

II. FINDINGS OF FACT AND CONCLUSIONS

As to the need for an Environmental Impact Statement (EIS) on this project and based on the record in this matter, including the EAW and comments received, the City of Saint Anthony Village makes the following Findings of Fact and Conclusions:

A. PROJECT DESCRIPTION

Continental Property Group proposes to redevelop an existing 15-acre manufactured home/RV park community, which holds 98 manufactured homes and 95 RV sites, into a combination of multi-family residential units (townhomes and apartments). The project is proposed to construct approximately 837 units.

B. PROJECT HISTORY

- The project was subject to a mandatory EAW per Minnesota Rule 4410.4300 Subpt 19.
- The EAW was distributed to the EQB and to the EQB mailing list on December 5, 2016.
- Public notices containing information about the availability of the EAW for public review was provided to the *St Anthony Bulletin* for publication in the December 7, 2016 papers.
- Hard copies of the EAW were provided for public review at Saint Anthony Village City Hall, Northeast Library, Environmental Conservation Library, and an electronic copy was provided on the City of Saint Anthony's website.
- A notice was published for the EAW in the December 5, 2016 EQB Monitor. The public comment period ended January 4, 2017. Comments were received from the USACE, Metropolitan Council, MPCA, SHPO, and Hennepin County. Copies of these comment letters are hereby incorporated for reference and included in **Attachment A**.

- Corrections to the EAW – No corrections were made to the EAW

C. CRITERIA FOR DETERMINING THE POTENTIAL FOR SIGNIFICANT ENVIRONMENTAL EFFECTS.

Minnesota Rule 4410.1700, subp. 1, states "An EIS [Environmental Impact Statement] shall be ordered for projects that have the potential for significant environmental effects." In deciding whether a project has the potential for significant environmental effects, the City of Saint Anthony Village must consider the four factors set out in Minnesota Rule 4410.1700, subp. 7. With respect to each of these factors, the City of Saint Anthony Village finds the following:

1. MINNESOTA RULE 4410.1700, SUBP. 7.A - TYPE, EXTENT, AND REVERSIBILITY OF ENVIRONMENTAL EFFECTS

- a. The type of environmental impacts and mitigation efforts anticipated as part of this project include:

Soil Disturbance - The project will involve soil disturbance. A National Pollutant Discharge Elimination System (NPDES) permit will be required and erosion control best management practices (BMPs) will need to be in place throughout construction.

Zoning - The property is currently zoned as Low Density Residential but is guided to High Density Residential in the City of Saint Anthony Village's 2008 Comprehensive plan. The project fits within the spirit of high density residential zoning but the development as currently proposed will have a higher residential density than described in Comprehensive Plan's description of High Density Residential. The City of Saint Anthony Village will address these discrepancies in the 2040 Update to the Comprehensive Plan. A zoning amendment must be requested by the owner to rezone the property as High Density Residential.

Land Use - The existing property is a manufactured home community within a developed urban area. The project will convert the area into a high density residential area. This land use is compatible with the Comprehensive plan but the proposed density is greater than the residential density outlined in the comprehensive plan. The City of Saint Anthony Village will address these discrepancies in the 2040 Update to the Comprehensive Plan.

Wastewater – The project will increase average day sanitary sewer flows by an estimated 230,000 gallons per day. Wastewater will be conveyed to the Metro Wastewater Treatment Plant (WWTP) via the Metropolitan Council Environmental Services (MCES) interceptor. The existing wastewater system is capable of handling the increase sanitary flow. The increase in wastewater resulting from the proposed project is not expected to require immediate expansion or improvements to the existing wastewater infrastructure or treatment plant. A sanitary sewer lift station with a force main will likely be required to convey sanitary flow from the development to the existing infrastructure.

Water Supply – The proposed development will increase average and maximum day water demands by approximately 140,000 and 300,000 gallons per day, respectively. These flows would be delivered from the City of Saint Anthony Village's existing water treatment plant (WTP), through the 10-inch trunk main that runs along Silver Lake Road to Kenzie Terrace. The City's existing water storage and supply will be adequate in managing the increased water demand

from this proposed development but there are some existing differences in the City of Saint Anthony Village's system that will need to be addressed to provide the desired increase in levels of service. Any deficiencies in the system will be addressed at the time of preliminary plat review for the redevelopment.

The available flow rate for building's fire system at the proposed location is approximately 2,300 gpm which is below the Insurance Service Office (ISO)'s requirement. Since the City's existing water main does not have sufficient capacity to supply the development with required ISO fire flow rate, the City of Saint Anthony Village's existing trunk main may require upsizing or a booster station may need to be installed to increase pressure. This will be determined upon the review of the preliminary development plan.

There is an existing water main easement running through the site that will need to be vacated and re-located as part of the development proposal.

Water Quality – The project will increase impervious surface area and the rate of runoff at the project sites. Existing runoff drains to a depression in the southeast quadrant of the project area and discharges to the Saint Anthony Village stormwater system. The stormwater is then discharged into the City of Minneapolis system and into the Mississippi River. City Stormwater System currently surcharges and flows back into this property. Therefore, backflow preventers may be required to manage stormwater runoff onto this site. This will be determined upon the review of the preliminary development plan.

Stormwater quality requires the capture and retention of the first 1.1 inches of runoff from the new and fully reconstructed impervious surfaces. However, due to the presence of clay soils and the potential for mobilization of contamination, infiltration is discouraged on this site. Therefore, if the site is unable to capture and retain the 1.1 inches the site must meet the Mississippi River Watershed Management Organization Watershed Management Plan standards. Any deficiencies in the system for the development will be addressed at the time of preliminary plat review for the redevelopment.

The one existing storm sewer connection between the project site and Kenzie Terrace will need to be reviewed and permitted by Hennepin County.

Potential Environmental Hazards – An underground storage tank (UST) was located at project site but was removed in 1986. A site leak was discovered in 2012 and consisted of fuel oil 1 & 2. The leak impacted groundwater. The leak was issued site closure by the MPCA in 2013. Site closure means that the leak does not pose a threat to human health or the environment but the site is not necessarily free of contamination. If excavation is proposed in the vicinity of this site, there is a potential for encountering petroleum impacted soils and/or groundwater will be encountered from the leak. Based on current information, the potential for this is high.

Phase I and II Environmental Site Assessments (ESAs) were completed for the project area in 2012, and two additional Phase II investigations were completed in 2016.

In 2016, various volatile organic compounds (VOCs), and tetrachloroethene were detected in soil vapor at the project site at levels higher than residential intrusion screening values. Diesel range organics (DROs) were detected at concentrations above the MPCA's criteria for unregulated fill. Diesel range organics and

tetrachloroethene were detected in the ground water at the project site. Excavation during construction is likely to encounter contaminated soil and/or groundwater that will require special management during construction. Additionally, previous Phase II ESA information indicates the property soil is regulated for DRO and VOCs in select areas. A Voluntary Response Action Plan (VRAP) has been prepared for the proposed project and has been approved by the MPCA.

The project will involve demolition of buildings. The buildings will need to be inspected for regulated materials prior to demolition. If regulated materials are found they will need to be handled and disposed of in accordance with state and local regulations.

Transportation (Parking and Traffic) - A Traffic Impact Study was completed for the project. This Study provided a comprehensive look at anticipated traffic impacts for the regional area. The Traffic Study identified recommended mitigation improvements for 2018 with the proposed development and by 2030 as the area develops. These recommendations include:

1. 2018 with The Village, LLC Development:

- Optimize the signal time and coordination between the St Anthony Blvd intersections at New Brighton Blvd (CR 88) and Silver Lake Blvd/Kenzie Terrace (CR 153).
- Lengthen the northwest bound left turn lane from St Anthony Blvd to southbound New Brighton Blvd (CR 88) from 125 feet to 200 feet.
- Lengthen the northeast bound right turn lane from Kenzie Terrace (CR 153) to southeast St Anthony Blvd from 170 feet to 200 feet.
- Lengthen the southwest bound left turn from Silver Lake Blvd (CR 153) to southeast St Anthony Blvd from 100 feet to 175 feet.
- Lengthen the westbound left turn from Kenzie Terrace (CR 153) to southbound NE Stinson Parkway (CR 27) by shortening or removing the existing left turn lane from Kenzie Terrace to the Bremer Bank Building.
- Lengthen the northbound left turn from NE Stinson Parkway to westbound NE Lowry Ave from 150 feet to 300 feet.
- At the proposed site driveway at Wilson St on Kenzie Terrace (CR 153) provide:
 - o Two lanes exiting the site (one left turn and one through/right lane)
 - o Left turn lane from Kenzie Terrace (CR 153) into the site
 - o Right turn lane from Kenzie Terrace (CR 153) into the site

2. 2030 with Future Area Development:

- Consider a dual roundabout or other intersection control improvements for the St Anthony Blvd intersections at New Brighton Blvd (CR 88) and Silver Lake Blvd/Kenzie Terrace (CR 153).
- Consider a roundabout or other intersection control improvements at the

intersection of Kenzie Terrace (CR 153)/NE Lowry Ave at NE Stinson Parkway.

- b. The extent and reversibility of environmental impacts for the proposed project are consistent with those of a typical residential development project. Impacts will be minimized to the extent practical, with mitigation provided for those impacts which cannot be avoided to resources such as water surface runoff, traffic etc.
2. MINNESOTA RULE 4410.1700, SUBP. 7.B - CUMULATIVE POTENTIAL EFFECTS OF RELATED OR ANTICIPATED FUTURE PROJECTS

The proposed project will result in redevelopment of the 15-acre project area. Impacts within the project area will result from removal of the existing manufactured home park and the construction of the apartments, townhomes and associated infrastructure. The area surrounding the project area is fully developed. No reasonably foreseeable future projects that would combine with the impacts described in this EAW to create cumulative impacts exist.

3. MINNESOTA RULE 4410.1700, SUBP. 7.C - THE EXTENT TO WHICH ENVIRONMENTAL AFFECTS ARE SUBJECT TO MITIGATION BY ONGOING PUBLIC REGULATORY AUTHORITY

a) The following permits or approvals will be required for the project:

Unit of government	Type of application	Status
State		
MPCA	NPDES Construction Stormwater Permit	To be obtained
MPCA	Sanitary Sewer Connection	To be obtained
State Statue Governing Manufactured Home Park Closure	Compliance with procedure	To be obtained
Metropolitan Council	MCES Permit	To be obtained, if necessary
County		
Hennepin County	Roadway Access to Kenzie Terrace	To be obtained
Hennepin County	Storm sewer connection	To be obtained
Local		
City of St. Anthony Village	Land Use Application, which includes: -Preliminary Plat -Planned Unit Development Rezoning -Preliminary Development Plan -Final Development Plan Final Plat -Easement vacation	Under Review
City of St. Anthony Village	Declaration of Need for an Enviromental Impact Statement (EIS)	To be obtained
City of St. Anthony Village	Building and/or grading permits	To be obtained
Mississippi River Watershed Management Organization (WMO) permitting	Surface water	
Minneapolis Park and Recreation	Roadway Access to Stinson Parkway	To be obtained

- b) The City of Saint Anthony Village finds that the potential impacts identified as part of the proposed The Village, LLC Redevelopment project are minimal and

can be addressed through the regulatory agencies as part of the permitting process. As a result, additional analysis of these impacts is not required.

4. MINNESOTA RULE 4410.1700, SUBP. 7.D - THE EXTENT TO WHICH ENVIRONMENTAL EFFECTS CAN BE ANTICIPATED AND CONTROLLED AS A RESULT OF OTHER AVAILABLE ENVIRONMENTAL STUDIES UNDERTAKEN BY PUBLIC AGENCIES OR THE PROJECT PROPOSER, INCLUDING OTHER EISs.

The City finds:

1. The proposed project is reasonably similar to other development and redevelopment projects in the area. Other large scale residential redevelopment projects have been completed in the neighboring areas of the City of Minneapolis in recent years.
2. No EIS that addresses a similarly sized project is known to be available in the City of Saint Anthony Village or the surrounding area.
3. In light of the results of environmental review and permitting processes for similar projects, the City of Saint Anthony Village finds that the environmental effects of the project can be adequately anticipated, controlled, and mitigated.

The City of Saint Anthony Village finds that the environmental effects of the project can be anticipated and controlled as a result of the environmental review, planning, and permitting processes.

D. CONCLUSIONS

The Village, LLC Redevelopment EAW and comments received have generated information adequate to determine that the proposed project does not have the potential for significant environmental effects.

The EAW has identified areas where the potential for environmental effects exist, but appropriate mitigation measures have been incorporated into the project plans and the required approvals and permits to mitigate these effects are being obtained. The project will comply with all county, city, and federal review agency requirements.

Based on the criteria established in Minnesota Rule 4410.1700, the project does not have the potential for significant environmental effects.

Based on the Findings of Fact and Conclusions, the project does not have the potential for significant environmental impacts.

Therefore, an EIS is not required for The Village, LLC Redevelopment project.

III. AGENCY COMMENTS AND CITY OF SAINT ANTHONY VILLAGE RESPONSES

A 30-day comment period for the above-referenced EAW ended on January 4, 2017. Comments were received from USACE, Metropolitan Council, MPCA, SHPO, and Hennepin County. On behalf of the City of Saint Anthony Village as the RGU, comment responses are provided below.

These letters are included in **Attachment A**. Comments received and responses are summarized below.

Comment 1 (USACE):

We have received your submittal.

Response to Comment 1: Thank you for reviewing the EAW.

Comment 2 (MPCA):

Thank you for the opportunity to review and comment on the EAW for The Village, LLC Redevelopment project. MPCA staff has reviewed the EAW and have no comments at this time.

Response to Comment 2: Thank you for reviewing the EAW.

Comment 3 (Metropolitan Council):

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

Response to Comment 3: Thank you for reviewing the EAW.

Comment 4 (Metropolitan Council):

The scale of development proposed in the EAW accommodates a greater number of households than what is currently forecasted for growth in the City of Saint Anthony Village. A forecast increase is needed and the City of Saint Anthony Village should request a forecast increase as part of a comprehensive plan amendment or part of the comprehensive plan update due in 2018. Metropolitan Council staff would recommend the additional of 700 households and 1,800 population to the Transportation Analysis Zone (TAZ) #1263. The City of Saint Anthony Village can consult with Michael Larson, their Sector Representative.

Response to Comment 4: The City will include the updated forecasts, as outlined in the 2040 Update to the Comprehensive Plan.

Comment 5 (Metropolitan Council):

The EAW is correct that the site is guided for High Density Residential but the EAW doesn't address the development density, which is addressed in the City of Saint Anthony Village's comprehensive plan. The residential density of the proposed development is greater (54 dwelling units per acres (du/acre)) than the residential density stated in Table 2-6 of the City of Saint Anthony Village's comprehensive plan (8 and 40 du/acre) for the High Density Residential. A review of the EAW by MCES indicates that there is adequate capacity of wastewater flow at this site for the anticipated residential density. The City of Saint Anthony Village should adjust its development density assumptions through a comprehensive plan amendment.

Response to Comment 5: The City of Saint Anthony Village will include the updated land use descriptions and tables regarding density in the 2040 Update to the Comprehensive Plan.

Comment 6 (Metropolitan Council):

The proposed development fits with the description of High Density Residential in Table 2-4 of the City of Saint Anthony Village's Comprehensive Plan which includes descriptions of land use categories. Table 2-4 does not include assumptions about a density range for High Density Residential but does include assumptions about a density range for other land uses. Table 2-4 should be amended to include density ranges for all land use categories that allow residential development, consistent with Table 2-6.

Response to Comment 6: The City of Saint Anthony Village will include the updated land use descriptions and tables regarding density in the 2040 Update to the Comprehensive Plan.

Comment 7 (Metropolitan Council):

There is no indication of any specific efforts to mitigate the loss of the 98 affordable housing units in Lowry Grove. The Metropolitan Council encourages the City of Saint Anthony Village to utilize available tools and resource to realize the development of 98 income-restricted units affordable at 60% of area median income as part of the development, elsewhere in the City of Saint Anthony Village, or some combination of the two.

Response to Comment 7: The City of Saint Anthony Village anticipates affordable housing as part of the developer's proposal. The details of which will be reviewed at the time of the preliminary development plan.

Comment 8 (Metropolitan Council):

The development appears to be in line with the MPCA's recommendations regarding site soils and potential groundwater contamination. There appears to be deficiencies, however, in the City of Saint Anthony Village's stormwater and water supply infrastructure that will need to be addressed by the City of Saint Anthony Village to provide the desired increase in levels of service to this proposed development.

Response to Comment 8: The City of Saint Anthony Village will address such deficiencies at the time of preliminary plat review for the re-development. The City of Saint Anthony Village has processes in-place to address these issues during the permit and review processes.

Comment 9 (Metropolitan Council):

The redevelopment of the project site provides an opportunity to enhance bus waiting facilities including the installation of electric utilities to support light and heat in shelters, as well as improved pedestrian connections. Please contact us about the potential for coordinated improvement.

Response to Comment 9: The City of Saint Anthony Village will contact Metropolitan Council to coordinate enhanced bus shelters at the time of preliminary plat.

Comment 10 (Hennepin County):

For all proposed mitigation work on Hennepin County roadways once ready, Hennepin County will require review and ultimately a permit will need to be obtained before this work commences.

Response to Comment 10: The City of Saint Anthony Village will submit to Hennepin County any improvement plans and permits required as identified in the EAW for review and approval.

Comment 11 (Hennepin County):

For work on Stinson Blvd and Hennepin County Road 153, the County will require Minneapolis Park Board coordination as well.

Response to Comment 11: The City of Saint Anthony Village will submit to the City of Minneapolis any improvement plans and permits required as identified in the EAW for review and approval.

Comment 12 (Hennepin County):

Is there any storm sewer connection (existing or proposed) between the project site and Kenzie Terrace (Hennepin County Road 153)? If so, this connection will require further review and permitting by Hennepin County. Connections to the Hennepin County storm sewer system are only allowed at existing connection locations by permit.

Response to Comment 12: There is one existing storm sewer connection between the project site and Kenzie Terrace. Permits will be obtained at the time of preliminary plat review for the re-development. The City of Saint Anthony Village and Hennepin County have processes in place to address storm water in the permit and plan approval processes.

Comment 13 (Hennepin County):

The traffic analysis discussed in the Transportation Section of the EAW needs to provide a 20 year projection for 2038 (not a 12 year projection for 2030) and should be reflected throughout the document and in the suggested mitigation. The analysis should also assume the full intersections are not rebuilt to roundabouts, unless that is what is proposed with the development.

Response to Comment 13: The analysis for 2030 included assumption of full build of the proposed development with a minimal background traffic growth of 0.15%/year. Increasing the traffic volumes from 2030 to 2038 would increase the background traffic conditions by only 1.2%. The recommended mitigation plan identified short term and long term improvements. The short term improvements are based on the 2018 conditions assuming the full build of the development. The long term represents improvements that should/could be considered as traffic increases. The recommendation indicated that roundabouts should be considered. At the point when additional intersection improvements are needed an Intersection Control Evaluation (ICE) would be completed to determine the best solution for each intersection.

Based on our engineering judgement the requested modification will not in our opinion change the recommended mitigation. However, the City of Saint Anthony Village will work with Hennepin County to make any necessary changes to the Traffic Study through the development approval process.

Comment 14 (Hennepin County):

It was suggested to optimize the signal time and coordination between the St Anthony Blvd intersections at New Brighton Blvd (CR 88) and Silver Lake Blvd/Kenzie Terrace (CR 153) – What signal timings were used in the analysis? The synchro/sim traffic files will need review by Hennepin County

Response to Comment 14: The signal timing used for the intersections was based on optimization of the intersection traffic conditions using the Synchro/SimTraffic software. The worksheet will be provided to Hennepin County for review with the revised Traffic Study.

Comment 15 (Hennepin County):

What is the logic of lengthening the NW bound left-turn lane on St. Anthony Parkway to the southbound New Brighton Blvd (CSAH 88) from 125' to 200' suggested as mitigation? The traffic study shows the movement largely stays the same through build and non-build scenarios. Is this suggesting that many residents/visitors to the development would cut through the shopping center via Pentagon Dr?

Response to Comment 15: Although the changes are not significant, the anticipated vehicle queue lengths will be reaching the available storage based on the Synchro/SimTraffic analysis.

Comment 16 (Hennepin County):

Lengthening the NB right-turn land from Kenzie Terrace (CSAH 153) to southbound St. Anthony Parkway to 200' would put the taper right at the existing curb cut from the shopping center

Response to Comment 16: The location of where the turn lane taper begins will be reviewed and approved by Hennepin County prior to completion of final design plans.

Comment 17 (Hennepin County):

The statement on page 23 or 24 that says "lengthen the southwest bound turn land from Silver Lake BLVD (CR 153)" should be corrected to Silver Lake ROAD, and as CR 136.

Response to Comment 17: Comment is noted and will be changed with the revised Traffic Study.

Comment 18 (Hennepin County):

If considering roundabouts in the immediate vicinity Stinson and St. Anthony Blvd intersection should potential be considered as a well

Response to Comment 18: Comment is noted and will be considered with the revised Traffic Study.

Comment 19 (Hennepin County):

Traffic Impact Study (Appendix D), Page 6, the lane configuration for the Kenzie at Lowry Grove Entrance listed is not correct and should include east bound (EB) Kenzie as one left, one through and one through/right

Response to Comment 19: The analysis used the correct lane configuration. The comment is noted and will be changed with the revised Traffic Study.

Comment 20 (Hennepin County):

Traffic Impact Study (Appendix D), Page 6, the lane configuration for the Kenzie at Wilson Street is not correct and should include EB Kenzie as one through and one through/right, and west bound (WB) Kenzie as one left and two through lanes

Response to Comment 20: The analysis used the correct lane configuration. The comment is noted and will be changed with the revised Traffic Study.

Comment 21 (Hennepin County):

Traffic Impact Study (Appendix D), Page 7, more discussion on the crash data is needed, including calculated crash rate and critical rate for all intersections and the average rate for similar types of intersections for comparison

Response to Comment 21: Comment is noted and additional discussion will be added with the revised Traffic Study.

Comment 22 (Hennepin County):

Traffic Impact Study (Appendix D), Page 10, the background growth of projected traffic needs to be projected to 2038. The growth rate used in the analysis of 0.15% seems low compared to historically what Hennepin County has seen. The rate of 0.50% is typically used for well-developed locations such as Minneapolis.

Response to Comment 22: As indicated in the Traffic Study the 0.15% growth rate is based on the Metropolitan Council modeling. Based on our engineering judgement the requested modification will not in our opinion change the recommended mitigation. However, the City of Saint Anthony Village will work with Hennepin County to make any necessary changes to the Traffic Study through the development approval process.

Comment 23 (Hennepin County):

Traffic Impact Study (Appendix D), Page 11, the 5% of traffic estimate is believed to underestimate trips to/from the southeast on St Anthony Blvd, especially since that route can account for the majority of St. Paul and other East/SE trips involving TH 280/ I-94E.

Response to Comment 23: The traffic distribution is based on the existing travel sheds and the Metropolitan Council modeling. As indicated previously we will work with Hennepin County to make any necessary changes to the Traffic Study through the development approval process.

Comment 24 (Hennepin County):

Traffic Impact Study (Appendix D), Page 11, the 50% of trips to/from the south on Stinson further complicates an already congested intersection with 18th Ave/Stinson Blvd/New Brighton Blvd. For completeness, the study should include this intersection in the scope/mitigation analysis

Response to Comment 24: This intersection was not identified during the initial meeting with Hennepin County. Additional traffic volume data will be required to complete the analysis. As indicated previously we will work with Hennepin County to make any necessary changes to the Traffic Study through the development approval process.

Comment 25 (Hennepin County):

Traffic Impact Study (Appendix D), Table 3, for all intersections with traffic signals, are these LOS [Level of Service] values based on existing signal timings or are these based on adjusted timings? If with timings adjusted, what adjustments have been made?

Response to Comment 25: As indicated previously, the signal timing used for the intersections was based on optimization of the intersection traffic conditions using the Synchro/SimTraffic software. The worksheet will be provided to Hennepin County for review with the revised Traffic Study.

Comment 26 (Hennepin County):

Traffic Impact Study (Appendix D), Tables 4 and 5, future projected level of service needs to be redone for the year 2038 and using a 0.5% growth rate.

Response to Comment 26: Comment is noted. All Tables will be updated with the revised Traffic Study.

Comment 27 (Hennepin County):

Traffic Impact Study (Appendix D), Tables 4 and 5, according to the tables, some movements at St. Anthony Boulevard/Kenzie Terrace and Stinson Boulevard/Lowry Avenue/Kenzie Terrace operate less than LOS D. What are those movements? The LOS of those movements needs to be identified as well as under the existing 2016 conditions for comparison purposes.

Response to Comment 27: Comment is noted and the additional information will be included with the revised Traffic Study.

Comment 28 (Hennepin County):

Traffic Impact Study (Appendix D), Tables 4 and 5, are these LOS values based on existing signal timings or are these based on adjusted timings? If with timings adjusted, what adjustments have been made?

Response to Comment 28: As indicated previously, the signal timing used for the intersections was based on optimization of the intersection traffic conditions using the Synchro/SimTraffic software. The worksheet will be provided to Hennepin County for review with the revised Traffic Study.

Comment 29 (Hennepin County):

Figure 6 is not included in the report. Please provide.

Response to Comment 29: Figure 6 is shown on page 12 of the current Traffic Study. The City of Saint Anthony Village will insure that it is included with revised Traffic Study.

Comment 30 (SHPO):

Based on our review of the project information, we conclude that there are no properties listed in the National or State Registers of Historical Places, and no known or suspected archaeological properties in the area that will be affected by this project.

Response to Comment 30: Thank you for reviewing the EAW.

Comment 31 (SHPO):

As stated in the EAW, Stinson Parkway is contributing to the Ground Rounds Historic District. We appreciate the efforts to minimize visual effects to the historic district by locating the small-scale (2-3 story) townhomes closer to the parkway and the taller multi-unit (5 story) buildings behind the townhomes, further away from the parkway.

Response to Comment 31: Thank you for reviewing the EAW.

Comment 32 (SHPO):

If this project is considered for federal assistance, or requires a federal license or permit, a Section 106 consultation will need to be completed. The responsible federal agency should submit the project to our office for consultation.

Response to Comment 32: If federal assistance or a federal license or permit becomes part of the project, your office will be consulted.