

Twin Cities Army Ammunition Plant (TCAAP)

AUAR UPDATE

Adopted August 26, 2019

Prepared for:



Prepared by:

Kimley»»Horn

AUGUST 2019

Table of Contents

1. Introduction	1
2. Existing Conditions	1
3. Development Scenarios.....	4
4. Impact Analysis	4
5. Mitigation Summary and Update	11
6. AUAR Update Review.....	15

List of Tables

Table 1: Development Scenarios.....	4
Table 2: Future Land Uses Identified in the AUAR Study Area.....	5
Table 3: Updated State-Listed Species Within the Review Area	8
Table 4: 2030 Peak Hour Traffic Analysis Results.....	10
Table 5: 2030 Minimum Development Scenario Peak Hour Mitigation Traffic Analysis Results	10
Table 6: 2030 Maximum Development Scenario Peak Hour Mitigation Traffic Analysis Results	11
Table 7: Permits and Approvals Required	11

List of Figures

Figure 1: AUAR Study Area	3
---------------------------------	---

List of Attachments

- Attachment A: Map of MnDOT/Ramsey County Regional Projects
- Attachment B: Wetland Jurisdictional Determinations
- Attachment C: Land Use and Zoning Maps
- Attachment D: Comments and Responses

1. Introduction

The Twin Cities Army Ammunition Plant (TCAAP) Alternative Urban Areawide Review (AUAR) study area is 429 acres located within the broader TCAAP site in Arden Hills. Ramsey County purchased 427 acres of the site in 2013, and Ramsey County Parks & Recreation owns the remaining 2 acres. The AUAR study area is bounded by County Road 96 on the south, by Trunk Highway (TH) 10 and Interstate 35W (I-35W) on the west, by State of Minnesota property on the north, and by the National Guard's Arden Hills Army Training Site (AHATS) property on the east (see Figure 1).

As the Responsible Governmental Unit (RGU), the City of Arden Hills adopted the TCAAP Final AUAR and Mitigation Plan on July 28, 2014. Pursuant to Minnesota Rules, part 4410.3610, subpart 7, an AUAR and plan for mitigation must be revised every five years until all development in the study area has received final approval. Since the study area has not been fully developed, the purpose of this document is to update the TCAAP AUAR pursuant to Minnesota Rules.

This report is intended to serve as an update to the 2014 AUAR and includes information on development to date, an update to the environmental analysis where necessary, and a review of mitigation measures.

2. Existing Conditions

No residential, retail, or commercial development has occurred within the AUAR study area. However, since the AUAR was published, the following environmental remediation work and adjacent infrastructure improvement projects have been completed (see map in Attachment A):

- 2015:
 - Demolition and remediation within the AUAR study area was completed.
 - The new interchange at I-35W and County Road 96 was opened to traffic, including a new bridge with accommodations for pedestrians and bicycles.
- 2016:
 - Meanders were reintroduced within a portion of Rice Creek between County Road I and County Road H to facilitate the reconstruction of the County Road H and I-35W interchange. The new creek alignment was evaluated in a separate Environmental Assessment Worksheet completed by Ramsey County.
- 2017:
 - Construction of the County Road H and I-35W interchange was completed. County Road H now includes a new wider bridge over I-35W with two traffic lanes in each direction and a regional trail for bicycles and pedestrians. An off-ramp from I-35W northbound directly to County Road H was constructed. The Highway 10 westbound ramp to I-35W northbound was reconstructed to go over the new County Road H ramp. The project also included construction

of a new pedestrian bridge over Rice Creek and a noise wall along I-35W southbound between County Road I and County Road H2. Two roundabouts, one at each ramp terminal on either side of I-35W, were constructed.

- Construction of the County Road I, Rice Creek Parkway, and Old Highway 8 interchange was completed. Improvements included a roundabout, trail access, raised medians, and a new stretch of roadway between County Road H and County Road I referred to as the Thumb Road.
- Watermain and sanitary sewer needed for future development was installed along the western edge of the AUAR study area as part of the County Road I ramp reconstruction project. The watermain is located within the Thumb Road alignment, crosses Rice Creek, and connects to the Mounds View watermain along the west edge of the study area. The sanitary sewer is also located within the Thumb Road alignment and extends from County Road H to the northern boundary of the AUAR study area.

Figure 1: AUAR Study Area



3. Development Scenarios

There have been no changes to the development scenarios since the 2014 AUAR. The two development scenarios are outlined in Table 1.

Table 1: Development Scenarios

Component	Zoning Scenario	Maximum Development Scenario
Residential Units	1,500	2,500
Retail (square feet)	500,000	550,000
Non-Retail Commercial (square feet)	1,700,000	1,950,000

4. Impact Analysis

Analysis of the development scenarios focuses on land use; water resources; contamination, hazardous materials, and solid wastes; fish, plant communities, and sensitive ecological resources; and transportation. These were the issues that required specific mitigation measures as noted in the 2014 Final AUAR or that had changes in applicable regulations. For other issue areas, the analysis that was completed in 2014 remains valid. The issue areas with no anticipated changes in impacts or mitigation are listed in Section 4.1. Areas with updated analysis or regulatory context are included in Section 4.2.

4.1. Areas of No Anticipated Change

No changes are anticipated for the following areas within the 2014 AUAR:

- Cover types
- Geology, soils, and topography/land forms
- Historic properties
- Visual
- Air
- Noise
- Cumulative potential effects
- Other potential environmental effects

4.2. Areas Requiring Updates

4.2.1. Land Use

The 2014 AUAR referenced the City of Arden Hill's 2030 Comprehensive Plan, which was approved in September 2009. The 2030 Comprehensive Plan was amended in December 2016 to reflect the TCAAP Master Plan, which was approved by the City of Arden Hills in July 2015 and by Ramsey County in January 2016. The comprehensive plan amendment refined the future land uses identified in the AUAR study area from two future land use categories (Mixed Residential and Mixed Business) to 10 (see Table 2).

All cities, counties, and townships within the seven-county metropolitan region must prepare a comprehensive plan and update that plan as needed every 10 years. Consistent with this requirement, in January 2019 the City submitted its Draft 2040 Comprehensive Plan to the Metropolitan Council for review and is currently finalizing the plan in coordination with the Metropolitan Council.¹ The Draft 2040 Comprehensive Plan identifies the existing land use within the AUAR study area as undeveloped. The future land use categories for the AUAR study area are the same as were identified in the amended 2030 Comprehensive Plan; however, the Draft 2040 Comprehensive Plan refines the descriptions of the future land uses. Table 2 includes the 10 future land uses identified for the AUAR study area and the current descriptions.² Table 2 also links the future land uses to the corresponding development scenario components. The 2040 future land use map from the Draft 2040 Comprehensive Plan is included in Attachment C.

Table 2: Future Land Uses Identified in the AUAR Study Area

Future Land Use	Description in the Draft 2040 Comprehensive Plan	Corresponding Development Scenario Component
Neighborhood Residential (NR)	Provides for a range of attached and detached single-family and small multi-family uses at a density of 1.5 to 8 units per acre.	Residential
Town Center (TC)	Provides for a range of commercial and residential uses that offer housing, assisted living, senior housing, office, retail, restaurant, and civic uses. Every building in the Town Center will have residential uses at a minimum of 21 units per acre within the building. Residential uses are permitted at a density of 21 to 67 units per acre. The expected share of uses within this area are as follows: 5% to 25% Retail; 0% to 25% Office; and Residential will occupy the entire 15.9 acres. A development intensity of up to 6.0 building to land floor area ratio (FAR) may be allowed.	Residential, retail, and non-retail commercial
Campus Commercial (CC)	Provides for multiple, single tenant buildings or campuses within a business park atmosphere. Development intensity of up to 4 FAR may be allowed.	Non-retail commercial
Retail Mixed-Use (RMU)	Promotes retail as a primary use and allows for other commercial uses to be incorporated as vertical mixed-use buildings. A development intensity of up to 0.8 FAR may be allowed. The expected share of uses within this area are as follows: 50% to 100% Retail and 0% to 50% Office.	Retail and non-retail commercial

¹ The City Council approved submission of the Draft 2040 Comprehensive Plan to the Metropolitan Council on January 14, 2019. Official adoption of the plan will occur after the Metropolitan Council's review and any final revisions by the city. The draft plan is available at <https://www.cityofardenhills.org/451/2040-Comprehensive-Plan>.

² Note that the descriptions in Table 2 have been updated in coordination with the Metropolitan Council from the Draft 2040 Comprehensive Plan that is currently posted on the City's website.

Future Land Use	Description in the Draft 2040 Comprehensive Plan	Corresponding Development Scenario Component
Office Mixed-Use (OMU)	Focuses on office as a primary use, but also permits other commercial uses to be incorporated as vertical mixed-use buildings. A development intensity of up to 2 FAR may be allowed. The expected share of uses within this area are as follows: 0% to 50% Retail and 50% to 100% Office.	Retail and non-retail commercial
Flex Office (FO)	Permits large scale development for employment and light manufacturing uses that take advantage of highway frontage and automobile access. A development intensity of up to 1.5 FAR may be allowed.	Non-retail commercial
Public & Institutional (P/I)	Areas designated for uses such as government buildings, colleges, schools, and religious uses, but not medical uses. A development intensity of up to 0.8 FAR may be allowed.	Non-retail commercial
Utility (UTL)	Public or private land occupied by a power substation, water tower, municipal well, pumping station, drainage infrastructure, or similar use.	Not applicable
Park and Open Space (P/OS)	Areas designated as public parks.	Not applicable
Right-of-Way	Public vehicular, transit, and/or pedestrian rights-of-way	Not applicable

In addition, the TCAAP Redevelopment Code (TRC) was approved by the Arden Hills City Council in July 2015 and revised in December 2016. The TRC implements goals of the comprehensive plan and establishes the official zoning map for the site (see the City's zoning map in Attachment C).

Both development scenarios would be compatible with the future land uses identified in the amended 2030 Comprehensive Plan and the Draft 2040 Comprehensive Plan and with the TRC. No mitigation measures are necessary.

4.2.2. Water Resources

Wetlands

In the 2014 AUAR, 14.4 acres of wetland were identified within the study area. All 14.4 acres were assumed to be jurisdictional. Later in 2014, the US Army Corps of Engineers (USACE) issued an Approved Jurisdictional Determination (AJD) for the site, concluding that only three wetlands within the site are regulated by the USACE. The Rice Creek Watershed District (RCWD) also provided a determination of jurisdiction under the state Wetland Conservation Act. These letters are included in Attachment B. Permits to be obtained from the USACE and RCWD are included in Table 7.

As part of Ramsey County's Rice Creek meander project and the I-35W and County Road H interchange reconstruction project, 0.79 acres of wetland were impacted, 0.61 acres of

which were located within the AUAR study area. Based on the USACE and RCWD jurisdictional determinations, the impacts within the AUAR study area did not require mitigation; however, the impacts outside the AUAR study area required both state and federal mitigation of 0.6552 acres. Half of this replacement was created adjacent to the new creek alignment and half was purchased from available approved wetland bank credits.

No additional mitigation measures are needed based on this updated information.

Stormwater

A Comprehensive Stormwater Management Plan (CSMP) was approved for the AUAR study area in 2015. The CSMP presents the approach for meeting RCWD's **Water Quality Treatment and Peak Stormwater Runoff Control** requirements and is intended to streamline the regulatory permit approvals needed when development occurs.³ The CSMP will be updated as development occurs to reflect any changes to the RCWD Rules or site plan modifications since the CSMP was approved.

4.2.3. Contamination/Hazardous Materials/Solid Wastes

Demolition and remediation within the AUAR study area was completed by Ramsey County in 2015. In July 2016, the Minnesota Pollution Control Agency (MPCA) issued a Certificate of Completion for the broader TCAAP site, including the AUAR study area.⁴ The site was cleaned to residential standards. At the time the Certificate of Completion was issued, Ramsey County owned 397 acres of the 427-acre site and leased the remaining 30 acres. Ramsey County has since acquired the remaining 30 acres and has filed for an Amended Environmental Covenant, which will remove land use controls but retain the existing groundwater restrictions.

Ramsey County has requested that the US Environmental Protection Agency officially delist soil at the site from its Superfund list. The US Army will continue to operate the existing groundwater cleanup system. In 2018, the US Army conducted an optimization study for the groundwater cleanup system,⁵ and groundwater treatment is expected to continue until approximately 2040.⁶ No additional mitigation measures are needed.

³ The CSMP is available at <http://ricecreekcommons.com/wp-content/uploads/docs/Rice-Creek-Commons-CSMP.pdf>.

⁴ Available at <http://ricecreekcommons.com/wp-content/uploads/2016/07/TCAAP-Redevelopment-Certificate-of-Completion-06122016.pdf>.

⁵ Available at http://eml9g2kib3430igb0341sat1.wpengine.netdna-cdn.com/wp-content/uploads/docs/TCAAP_Draft-Final-OU-Remedy-Review_20180131-v1_0-1.pdf.

⁶ Additional information on remediation of the broader TCAAP site is available at <https://www.pca.state.mn.us/waste/new-brightonarden-hills-superfund-site-aka-twin-cities-army-ammunition-plant-or-tcaap#overview-937c145d>.

4.2.4. Fish, Plant Communities, and Sensitive Ecological Resources

The 2014 AUAR identified no state-listed or federally-listed threatened or endangered species or rare plant communities within the AUAR study area. State-listed species found beyond the AUAR study area were identified in or near Marsden Lake on the AHATS property and included a known population of Blanding's turtles (*Emydoidea blandingii* – state-listed threatened species); trumpeter swans (*Cygnus buccinator* – state-listed species of special concern); and a population of the plains pocket mouse (*Perognathus flavescens* – state-listed species of special concern, between the gravel pit and Marsden Lake).

A review of the Minnesota Department of Natural Resources (DNR) Natural Heritage Information System (NHIS) was conducted in June 2019 per license agreement LA-843 for the AUAR study area and the area within one mile. An additional four species of special concern and three threatened species were identified within the review area in addition to the species previously identified (see Table 3).

Table 3: Updated State-Listed Species Within the Review Area

Common Name	Scientific Name	Status	Habitat ⁷
Big brown bat	<i>Eptesicus fuscus</i>	Special concern	Winter roosts are located in caves and mines, though this species also regularly hibernates in buildings, cellars, and tunnels. Summer foraging areas are usually forested habitats near water sources. Warm season roosts can consist of human structures such as buildings and bridges; trees that are hollow, have crevices, loose bark, or cavities are also used.
Lark sparrow	<i>Chondestes grammacus</i>	Special concern	Short and/or sparse grasses (usually native) in areas of sand or gravel soils, with at least some bare ground and widely-scattered or patchy trees
Little brown myotis	<i>Myotis lucifugus</i>	Special concern	Winter roosts are located in caves, cellars, tunnels, and other underground structures. Summer habitat includes human structures such as bridges, buildings, and attics as well as forested habitats near water.
Plains pocket mouse	<i>Perognathus flavescens</i>	Special concern	Open, well-drained areas, typically on sandy soils with sparse, grassy or brushy vegetation

⁷ Source: DNR Rare Species Guide. Available at <https://www.dnr.state.mn.us/rsg/index.html>.

Common Name	Scientific Name	Status	Habitat ⁷
Small green wood orchid	<i>Platanthera clavellate</i>	Special concern	Swamp forests that have a continuous or interrupted canopy of black spruce or tamarack and non-forested poor fens that often ring peatland lakes. These habitats usually have hummocks of sphagnum moss interspersed with water-filled hollows. The soils are saturated, well-decomposed peat, and the surface water is acidic with a pH of 4.2-5.5.
Trumpeter swan	<i>Cygnus buccinator</i>	Special concern	During the breeding season, small ponds and lakes or bays on larger water bodies with extensive beds of emergent vegetation such as cattails, bulrushes, and sedges. Ideal habitat includes about 100 meters of open water for take-off, stable levels of unpolluted fresh water, emergent marsh vegetation, low levels of human disturbance, and the presence of muskrat houses and North American beaver lodges for use as nesting platforms.
Black huckleberry	<i>Gaylussacia baccata</i>	Threatened	Well-drained and sandy soil or dry sandstone in fire-dependent forests
Blanding's turtle	<i>Emydoidea blandingii</i>	Threatened	Wetland complexes and adjacent sandy uplands; calm, shallow waters, including wetlands associated with rivers and streams with rich aquatic vegetation.
Seaside three-awn	<i>Aristida tuberculosa</i>	Threatened	Dry and loose sand in sand savannas, sand prairies, and dunes where vegetation is sparse
Swamp blackberry	<i>Rubus semisetosus</i>	Threatened	Most occurrences are in savanna remnants, particularly on sand plains in Anoka, Isanti, and Sherburne Counties

The AUAR study area has undergone extensive demolition and remediation activities. Given the highly disturbed nature of the site, there is minimal likelihood of finding suitable habitat for the additional identified species. The four plant species require habitats that are not present on site (peat bog) or in relatively undisturbed prairie or savanna cover (huckleberry, blackberry, three-awn). The two bat species typically require caves or cavities for roosting, and the sparrow is typically found in native short grass.

As noted in the 2014 AUAR, DNR recommendations for minimizing impacts to the Blanding's turtle during construction will be required for all development activities. No direct or indirect effects are anticipated to state-listed species.

4.2.5. Transportation

The traffic analysis conducted in the 2014 AUAR is still valid since the development scenarios have not changed. A summary of the traffic analysis from the 2014 AUAR is provided in

Table 4, Table 5, and Table 6 (Table 18-5, Table 18-6, and Table 18-7, respectively, in the 2014 AUAR).

Table 4: 2030 Peak Hour Traffic Analysis Results

Intersection	Level of Service (LOS)					
	2030 No Build		2030 Baseline Min		2030 Baseline Max	
	AM	PM	AM	PM	AM	PM
Old Hwy 8 and CR 96	C	F	C	E	C	E
CR 96 and SB I-35W Ramp	A	F	C	C	B	C
CR 96 and NB I-35W Ramp	F	F	C	C	B	C
Round Lake Rd and CR 96	C	F	B	C	B	C
Old Hwy 10 and CR 96	B	F	C	D	C	C
CR 96 at US 10 NB Ramp	A	A	A	A	A	A
CR 96 and TCAAP Property/ North Heights Church Access	A	F	F	F	F	F
CR H and US 10	B	C	D	F	E	F
CR H and SB I-35W	A	A	B	B	C	E
CR H and NB I-35W	A	A	A	A	A	C
CR I and SB I-35W	D	C	C	C	C	C
CR I and NB I-35W	A	A	A	B	B	B
CR I and Old Hwy 8	A	A	A	C	A	B
CR I and N Fairview Ave	A	A	A	A	A	A

Table 5: 2030 Minimum Development Scenario Peak Hour Mitigation Traffic Analysis Results

Intersection	2030 Baseline Min Mitigated AM	2030 Baseline Min Mitigated PM
	LOS	LOS
Old Hwy 8 and CR 96	C	C
CR 96 and SB I-35W Ramp	C	C
CR 96 and NB I-35W Ramp	B	C
Round Lake Rd and CR 96	C	C
Old Hwy 10 and CR 96	C	D
CR 96 at US 10 NB Ramp	A	A
CR 96 and TCAAP Property/ North Heights Church Access	C	C
CR H and US 10	D	D
CR H and SB I-35W	B	B
CR H and NB I-35W	A	A
CR I and SB I-35W	C	C
CR I and NB I-35W	B	B
CR I and Old Hwy 8	A	A
CR I and N Fairview Ave	A	A

Table 6: 2030 Maximum Development Scenario Peak Hour Mitigation Traffic Analysis Results

Intersection	2030 Baseline Max Mitigated AM	2030 Baseline Max Mitigated PM
	LOS	LOS
Old Hwy 8 and CR 96	C	C
CR 96 and SB I-35W Ramp	C	C
CR 96 and NB I-35W Ramp	C	C
Round Lake Rd and CR 96	C	C
Old Hwy 10 and CR 96	C	C
CR 96 at US 10 NB Ramp	A	A
CR 96 and TCAAP Property/North Heights Church Access	C	D
CR H and US 10	C	D
CR H and SB I-35W	B	B
CR H and NB I-35W	A	C
CR I and SB I-35W	C	C
CR I and NB I-35W	B	B
CR I and Old Hwy 8	A	A
CR I and N Fairview Ave	A	A

As discussed in Section 2, some improvements to the transportation network in the vicinity of the AUAR study area have been completed, including at the I-35W/County Road 96, I-35W/County Road H, and County Road I/Rice Creek Parkway/Old Highway 8 interchanges. These improvements were assumed as part of the 2030 No Build analysis and, therefore, are consistent with the AUAR analysis.

5. Mitigation Summary and Update

The mitigation measures from the 2014 AUAR are outlined below along with a status update and any additional mitigation identified based on the information in Section 4.2. Mitigation measures are the same under both development scenarios unless noted otherwise.

5.1. Permits and Approvals Required

Table 7 lists the anticipated permits and approvals that were identified in Table 8-1 of the 2014 AUAR along with updates, where applicable.

Table 7: Permits and Approvals Required

Unit of Government	Type of Application/Approval	Status
US Army Corps of Engineers	Section 404 Permit	To be applied for
Minnesota Pollution Control Agency	National Pollutant Discharge Elimination System Stormwater Permit for Construction Activities	To be applied for
	Sanitary Sewer Extension Permit	To be applied for
	Soil and Groundwater Remediation Plan Approval	To be applied for, if needed

Unit of Government	Type of Application/Approval	Status
	Section 401 Certification	To be applied for, if needed
Minnesota Department of Health	Abandonment of Water Wells	To be applied for
	Watermain Installation Permit	To be applied for, if needed
Minnesota Department of Natural Resources	Groundwater Appropriation Permit (Construction)	To be applied for, if needed
	Public Waters Work Permit	To be applied for, if needed
Minnesota Department of Transportation	Right-of-Way Permit	To be applied for, if needed
Metropolitan Council	2030 Comprehensive Plan Amendment	Completed
	Draft 2040 Comprehensive Plan	Submitted
	Sanitary Sewer Extension Permit	To be applied for
Rice Creek Watershed District	Stormwater Management, Erosion Control, Floodplain Alteration, Wetland Alteration	To be applied for
Joint Development Authority	Preliminary and Final Plat Approvals Development Reviews/Approvals	Pending, by developers
City of Arden Hills	Boundary Plat Approval	Completed
	AUAR Approval	Completed
	2030 Comprehensive Plan Amendment	Completed
	Zoning Change Approval	Completed
	Grading, Excavation, and Foundation Permits	To be applied for
	Building and Utility Permits	To be applied for
Ramsey County	Erosion Control Permits	To be applied for
	Utility Permits in County Road Right-of-Way	To be applied for
	Access Permits (Connection to County Road)	To be applied for
	Hazardous Waste Permits	Approved

5.2. Land Use

No impacts or mitigation related to land use were identified in the 2014 AUAR. No incompatibility with existing or planned land use or zoning was identified as part of this AUAR update; therefore, no mitigation measures are needed.

5.3. Water Resources

The following mitigation measures from the 2014 AUAR remain valid:

- A lift station will be required depending on future uses for sanitary sewer, but the system will primarily be gravity-based.
- Stormwater will be managed on-site, maintaining the current drainage patterns and utilizing the current outfalls to Rice Creek and Round Lake.
- Stormwater will be conveyed to Round Lake and Rice Creek by means of underground storm sewer, vegetated swales, and wetlands. Conveyance systems

will be designed in accordance with acceptable industry standards and in conformance with jurisdictional requirements.

- The runoff rate will be reduced to 80% of the existing rate because the study area is located within a Flood Management Zone as defined by the RCWD.
- The primary method of stormwater treatment will be the use of multiple ponds for the removal of total phosphorous and total suspended solids. Water reuse, bio-filtration, filtration, and stormwater wetlands are also suitable for treatment within the study area.
- No discharge water will be directed to surface waters without prior retention in a temporary settling basin and a determination that no contamination exists. The developer will determine if groundwater is contaminated as a basis for determining discharge to storm sewer, sanitary sewer, or through a treatment process such as the existing groundwater treatment facilities. Temporary construction dewatering will require a Temporary Water Appropriations General Permit 1997-0005 if less than 50 million gallons per year and less than one year in duration.
- Wetland impacts will be replaced at a 2:1 ratio through a combination of on- and off-site replacement through plans/permit approved by the RCWD and USACE.

The following mitigation measures from the 2014 AUAR have been completed:

- The new crossing of Rice Creek would be via a bridge that spans the creek, wetlands and floodplain, and would allow wildlife to cross underneath. A trail crossing at this location may also be considered (under the creek bridge). The bridge will be designed to avoid impact on the floodplain.

The following are additional mitigation measures from this AUAR update:

- Proposed development will follow the approach outlined in the CSMP to meet RCWD's Water Quality Treatment and Peak Stormwater Runoff Control requirements.

5.4. Contamination/Hazardous Materials/Solid Wastes

The following mitigation measures from the 2014 AUAR remain valid:

- Handling of site contaminants is addressed in the overall Response Action Plan (RAP) approved for the site and/or within the 4 subarea RAPs addressing key hot spot remediation.
- In areas of previous volatile organic compound (VOC) contamination, testing or abatement measures for VOC vapors may be required by the City to avoid potential impacts of VOC vapors in new building spaces.
- Construction materials would be either recycled or disposed in the proper facilities.
- Solid waste recycling will be required by city code for residential users and may be added to city code in the future for commercial users.

No additional mitigation measures were identified as part of this AUAR update.

5.5. Fish, Plant Communities, and Sensitive Ecological Resources

The following mitigation measures from the 2014 AUAR remain valid:

- DNR recommendations for minimizing impacts to turtles during construction will be required for all development activities
- Creation of a green corridor through the AUAR study area will provide habitat elements for turtles, birds, and other wildlife. This corridor will provide an important link to the Rice Creek corridor and the County's adjacent wildlife corridor and is compatible with the Regionally Significant Ecological Area (RSEA) and Important Bird Area (IBA) designations.
- The City may also consider building guidelines that minimize the amount or type of glass used on multi-story building to minimize bird strikes.
- The osprey nesting platform at the water treatment building will be avoided by development.

5.6. Transportation

5.6.1. Zoning Scenario

The following mitigation measures from the 2014 AUAR remain valid:

- Trunk Highway (TH) 96 westbound auxiliary lane from east of the project boundary to TH 10.

The following mitigation measures from the 2014 AUAR have been completed:

- The County reconstructed the I-35W/County Road 96 interchange. The new interchange was designed to accommodate anticipated future traffic, including the TCAAP development.
- At the intersection of County Road H and TH 10, an additional eastbound left turn lane was constructed.

The following mitigation measures from the 2014 AUAR are no longer valid due to changes in the existing conditions:

- Re-introduction of County Road H southbound loop access to I-35W (removed as part of the baseline scenarios), which remains barrier separated from I-35W southbound exit ramp to TH 10 southbound and enters I-35W after joining the TH 10 southbound access ramp to I-35W southbound.
 - *This mitigation measure is no longer valid due to reconstruction of the County Road H and I-35W interchange.*
- At the intersection of Round Lake Road W at County Road 96, the lane use of the northbound center lane is recommended to be re-striped from an existing shared left/through lane to a shared left/through/right lane.
 - *This mitigation measure is no longer valid because the lanes were restriped after publication of the 2014 AUAR to include a left-turn lane, a center through lane, and a right-turn lane.*

No additional mitigation measures were identified as part of this AUAR update.

5.6.2. Maximum Development Scenario

In addition to the Zoning Scenario mitigation described above, these additional mitigation measures were recommended for the Maximum Development Scenario.

The following mitigation measures from the 2014 AUAR have been completed:

- The addition of a new northbound I-35W exit to County Road H, with a single lane approach to the roundabout on County Road H.
- An additional southbound left turn lane at the southbound exit from I-35W to County Road H.

No additional mitigation measures were identified as part of this AUAR update.

6. AUAR Update Review

Pursuant to Minnesota Rules, part 4410.3610, subpart 7, this AUAR update was available for a comment period of 10 business days. Comments were submitted by the MPCA, Minnesota Department of Transportation (MnDOT), Metropolitan Council, and The Alliance for Metropolitan Stability during the comment period ending August 12, 2019. Responses to the comments received are provided in Attachment D and a few minor revisions to the AUAR Update were incorporated accordingly.

The State Historic Preservation Office provided a comment letter on August 19, 2019 after the close of the comment period and did not raise any comments requiring a specific response (see Attachment D).

No objections were filed by state agencies or the Metropolitan Council. The TCAAP AUAR will remain valid for an additional five years from the date of adoption of the AUAR Update by the City of Arden Hills.

Attachment A

Map of MnDOT/Ramsey County Regional Projects

MnDOT/Ramsey County Regional Projects

I-35W/Highway 96
Interchange
(2015)

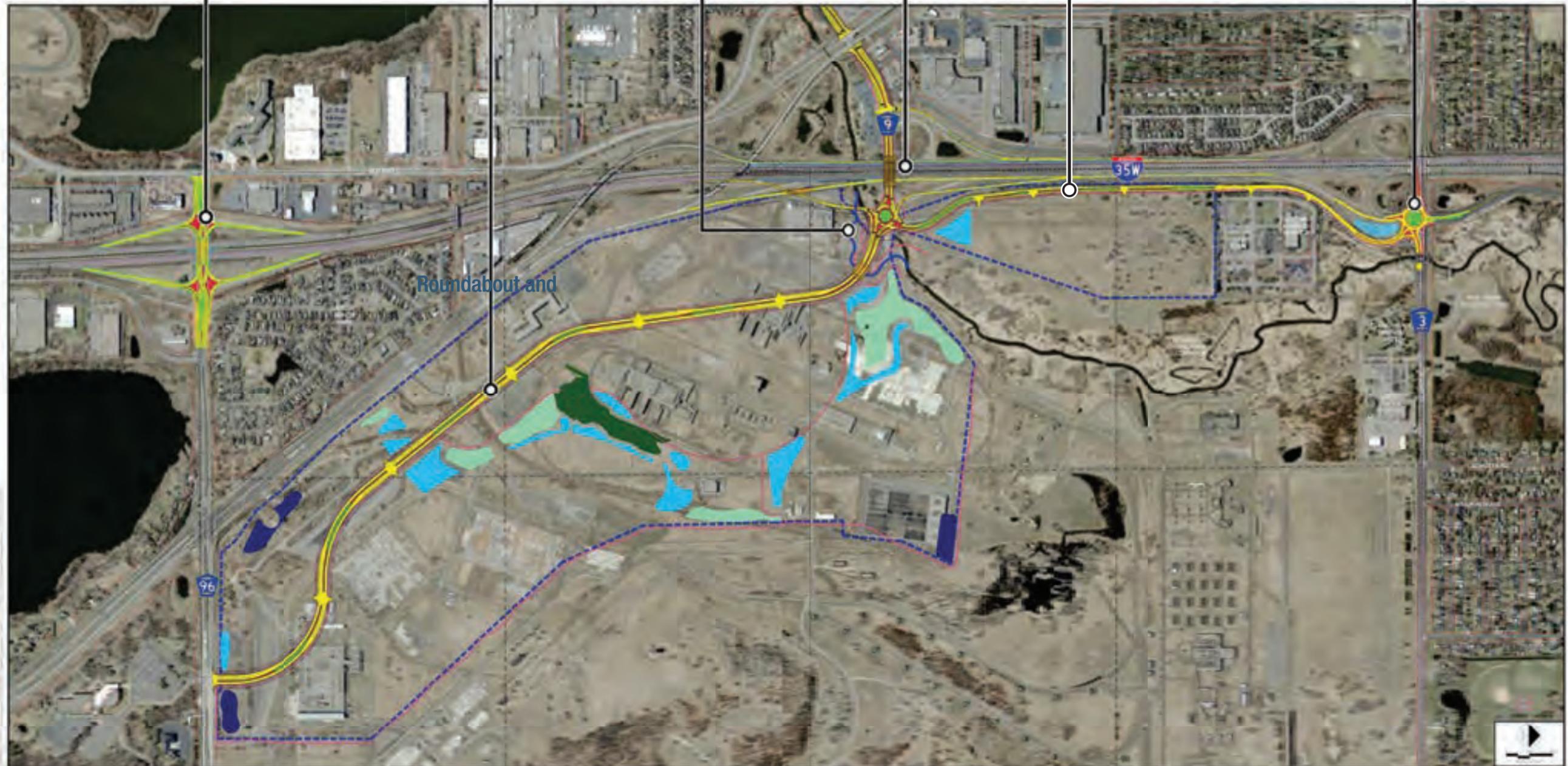
Spine Road
(not yet
scheduled)

Rice Creek
Meander
(2015)

I-35W/County
Road H Interchange
(2016)

Watermain and
Sanitary Sewer
(2017)

County Road I
Roundabout and
Thumb Road
(2017)



Attachment B

Wetland Jurisdictional Determinations

APPROVED JURISDICTIONAL DETERMINATION FORM
U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

SECTION I: BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD):

B. ST PAUL, MN DISTRICT OFFICE, FILE NAME, AND NUMBER: MVP-2009-01301-ADB

C. PROJECT LOCATION AND BACKGROUND INFORMATION:

State: **Minnesota** County/parish/borough: **Ramsey** City: **Arden Hills**

Center coordinates of site (lat/long in degree decimal format): Lat. **45.0923418580251° N**, Long. **-93.177063496792° W**.

Universal Transverse Mercator: **15**

Name of nearest waterbody: **Rice Creek**

Name of watershed or Hydrologic Unit Code (HUC): **Upper Mississippi Region 07010206**

Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.

Check if other sites (e.g., offsite mitigation sites, disposal sites, etc...) are associated with this action and are recorded on a different JD form.

D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

Office (Desk) Determination. Date: **April 30, 2014**

Field Determination. Date(s): **November 14, 2014**

SECTION II: SUMMARY OF FINDINGS

A. RHA SECTION 10 DETERMINATION OF JURISDICTION.

There are no "navigable waters of the U.S." within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area.

B. CWA SECTION 404 DETERMINATION OF JURISDICTION.

There are no "waters of the U.S." within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the review area.

1. Waters of the U.S.: N/A

2. Non-regulated waters/wetlands (check if applicable):¹

- Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined to be not jurisdictional. Explain: **There are multiple wetlands within the review area, but this isolated JD is only regarding waterbodies 2c, 6, 15, 17a, 17b, 17d, 20, 22/26, 24, 55, 57a, 57b and 57c. These wetlands were covered under a PJD issued on January 16, 2016. On March 2, 2016 the agent submitted additional information. Based upon the additional information, a review of aerial photographs, topographic, hydrologic and NWI maps, Ramsey County Soil Survey and a site visit with a Senior Ecologist on November 14, 2014, these waterbodies are hydrologically isolated from any surface water connection to a water of the U.S. They are completely surrounded by upland soils. They are determined to not be jurisdictional under the CWA because they lack the links to interstate commerce sufficient to serve as a basis for jurisdiction. The waterbodies do not support a link to interstate or foreign commerce because they are not known to be used by interstate or foreign travelers for recreation or other purposes; they do not produce fish or shellfish that could be taken and sold in interstate or foreign commerce; and are not known to be used for industrial purposes by industries in interstate commerce. Hydrologic connections, including ditches and storm sewers, were evaluated in the state they were in during our site visit on November 14, 2014 as shown on the attached drawings labeled MVP-2009-01301-ADB Page 1 of 4 through Page 4 of 4.**

SECTION III: CWA ANALYSIS

A. TNWs AND WETLANDS ADJACENT TO TNWs: N/A

B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY): N/A

C. SIGNIFICANT NEXUS DETERMINATION: N/A

D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY): N/A

¹ Supporting documentation is presented in Section III.F.

E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY): N/A

F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):

- If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.
- Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.
 - Prior to the Jan 2001 Supreme Court decision in "SWANCC," the review area would have been regulated based solely on the "Migratory Bird Rule" (MBR).
- Waters do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction. Explain:
- Other (explain, if not covered above):

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):

- Non-wetland waters (i.e., rivers, streams): linear feet width (ft).
- Lakes/ponds: acres.
- Other non-wetland waters: acres. List type of aquatic resource: .
- Wetlands: 7.0249acres.

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction (check all that apply):

- Non-wetland waters (i.e., rivers, streams): linear feet, width (ft).
- Lakes/ponds: acres.
- Other non-wetland waters: acres. List type of aquatic resource: .
- Wetlands: 2c=0.0736ac, 6=0.0239ac, 15=0.4899ac, 17a=0.1329ac, 17b=0.5341ac, 17d=0.2769ac, 20=0.4227ac, 22/26=4.6743ac, 24=0.1499ac, 55=0.1097ac, 57a=0.0756ac, 57b=0.0494ac, 57c=0.1309acres.

SECTION IV: DATA SOURCES.

A. SUPPORTING DATA. Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):

- Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant:
- Data sheets prepared/submitted by or on behalf of the applicant/consultant.
 - Office concurs with data sheets/delineation report.
 - Office does not concur with data sheets/delineation report.
- Data sheets prepared by the Corps:
- Corps navigable waters' study:
- U.S. Geological Survey Hydrologic Atlas:
 - USGS NHD data.
 - USGS 8 and 12 digit HUC maps.
- U.S. Geological Survey map(s). Cite scale & quad name:
- USDA Natural Resources Conservation Service Soil Survey. Citation:
- National wetlands inventory map(s). Cite name:
- State/Local wetland inventory map(s):
- FEMA/FIRM maps:
- 100-year Floodplain Elevation is: (National Geodetic Vertical Datum of 1929)
- Photographs: Aerial (Name & Date):
or Other (Name & Date):
- Previous determination(s). File no. and date of response letter:
- Applicable/supporting case law:
- Applicable/supporting scientific literature:
- Other information (please specify):

B. ADDITIONAL COMMENTS TO SUPPORT JD:

Figure S-6 - TCAAP 2011 Aerial Map



Former TCAAP Facility Wetlands
Arden Hills, MN



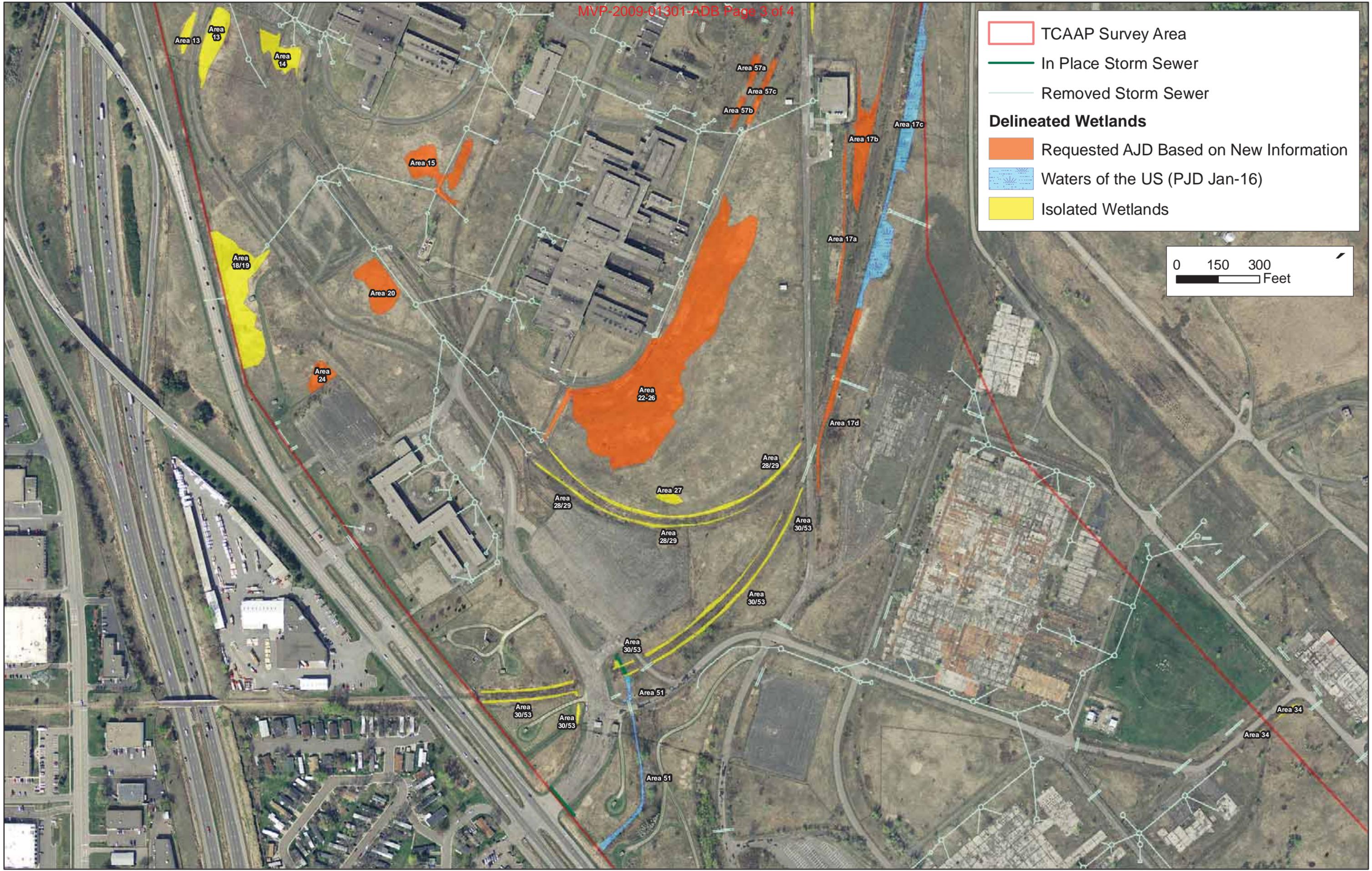
TCAAP Survey Area

- In Place Storm Sewer
- Removed Storm Sewer

Delineated Wetlands

- Requested AJD Based on New Information
- Waters of the US (PJD Jan-16)
- Isolated Wetlands





TCAAP Survey Area

- In Place Storm Sewer
- Removed Storm Sewer

Delineated Wetlands

- Requested AJD Based on New Information
- Waters of the US (PJD Jan-16)
- Isolated Wetlands





TCAAP Survey Area

- In Place Storm Sewer
- Removed Storm Sewer

Delineated Wetlands

- Requested AJD Based on New Information
- Waters of the US (PJD Jan-16)
- Isolated Wetlands



Minnesota Wetland Conservation Act

Notice of Decision

Local Government Unit (LGU) Rice Creek Watershed District	Address 4325 Pheasant Ridge Dr. NE #611 Blaine, MN 55449
---	---

1. PROJECT INFORMATION

Applicant Name Heather Worthington Ramsey County Department of Public Works 15 West Kellogg Blvd Suite 250 Court House St. Paul, MN 55102 heather.worthington@co.ramsey.mn.us	Project Name TCAAP redevelopment area regional SW discussion	Date of Application 12/09/2014	Application Number 13-140R
<input checked="" type="checkbox"/> Attach site locator map.			

Type of Decision:

<input checked="" type="checkbox"/> Wetland Boundary or Type	<input checked="" type="checkbox"/> No-Loss	<input type="checkbox"/> Exemption	<input type="checkbox"/> Sequencing
<input type="checkbox"/> Replacement Plan	<input type="checkbox"/> Banking Plan		

Technical Evaluation Panel Findings and Recommendation (if any):

<input type="checkbox"/> Approve	<input checked="" type="checkbox"/> Approve with conditions	<input type="checkbox"/> Deny
Summary (or attach): No formal comments; RCWD working with TEP for revised Findings of Fact to reflect the revision/amendment request.		

2. LOCAL GOVERNMENT UNIT DECISION

Date of Decision: 02/09/2015		
<input type="checkbox"/> Approved	<input checked="" type="checkbox"/> Approved with conditions (include below)	<input type="checkbox"/> Denied

LGU Findings and Conclusions (attach additional sheets as necessary):

LGU Findings and Conclusions (attach additional sheets as necessary):

This decision document supersedes the LGU decision made on 7/15/2014. The LGU finds the wetland boundaries illustrated within the "TCAAP Area of Investigation" in the 5 attached full color figures titled:
 Figure S-6: TCAAP 2011 Aerial Map;
 Figure S-7: TCAAP Northern Area Wetland Map Initial TEP Review WCA Statuses;
 Figure S-8: TCAAP Mid - North Wetland Map Initial TEP Review WCA Statuses;
 Figure S-9: TCAAP Mid-South Wetland Map Initial TEP Review WCA Statuses;
 Figure S-10: TCAAP and Figure 10 - TCAAP Southern Area Wetland Map Initial TEP Review WCA Statuses; all by Ramsey County Public Works provided in materials packet dated 12/5/2014 (RCWD received 12/9/2014) accurate and supported by the submitted wetland delineation for the LGU administration of the WCA. Further, wetland areas 2a, 2b, 2c, 2e, 17, 47, 50, 54, 57, and portions of 12, 24, 28/29, 30/53, 45, 46, 49, 56, 58 as shown on the attached color maps are "incidental" wetlands (were created in nonwetland areas solely by actions, the purpose of which was not to create the wetland) and are not within the Scope of the MN Wetland Conservation Act as described within Mn Rule 840.0105.

The local government unit decision is valid for five years. However, the decision will cease to be valid before then, if the Technical Evaluation Panel determines that the wetland boundary or type has changed due to natural or artificial changes to the hydrology, vegetation, or soils of the area. The LGU finds that the wetland typing may need to be reviewed in conjunction with any future project. The applicant needs to submit a survey of the wetland boundary as well as gps points of the wetland delineation in a form acceptable to the RCWD.

For Replacement Plans using credits from the State Wetland Bank:

Bank Account #	Bank Service Area	County	Credits Approved for Withdrawal (sq. ft. or nearest .01 acre)

Replacement Plan Approval Conditions. In addition to any conditions specified by the LGU, the approval of a Wetland Replacement Plan is conditional upon the following:

- Financial Assurance:** For project-specific replacement that is not in-advance, a financial assurance specified by the LGU must be submitted to the LGU in accordance with MN Rule 8420.0522, Subp. 9 (List amount and type in LGU Findings).
- Deed Recording:** For project-specific replacement, evidence must be provided to the LGU that the BWSR "Declaration of Restrictions and Covenants" and "Consent to Replacement Wetland" forms have been filed with the county recorder's office in which the replacement wetland is located.
- Credit Withdrawal:** For replacement consisting of wetland bank credits, confirmation that BWSR has withdrawn the credits from the state wetland bank as specified in the approved replacement plan.

Wetlands may not be impacted until all applicable conditions have been met!

LGU Authorized Signature:

Signing and mailing of this completed form to the appropriate recipients in accordance with 8420.0255, Subp. 5 provides notice that a decision was made by the LGU under the Wetland Conservation Act as specified above. If additional details on the decision exist, they have been provided to the landowner and are available from the LGU upon request.		
Name Phil Belfiori	Title Administrator	
Signature 	Date 02/09/2015	Phone Number and E-mail

THIS DECISION ONLY APPLIES TO THE MINNESOTA WETLAND CONSERVATION ACT. Additional approvals or permits from local, state, and federal agencies may be required. Check with all appropriate authorities before commencing work in or near wetlands.

Applicants proceed at their own risk if work authorized by this decision is started before the time period for appeal (30 days) has expired. If this decision is reversed or revised under appeal, the applicant may be responsible for restoring or replacing all wetland impacts.

3. APPEAL OF THIS DECISION

Pursuant to MN Rule 8420.0905, any appeal of this decision can only be commenced by mailing a petition for appeal, including applicable fee, within thirty (30) calendar days of the date of the mailing of this Notice to the following as indicated:

Check one:

<input checked="" type="checkbox"/> Appeal of an LGU staff decision. Send petition and \$0 fee (if applicable) to: Nick Tomczik 4325 Pheasant Ridge Dr. NE #611 Blaine, MN 55449	<input type="checkbox"/> Appeal of LGU governing body decision. Send petition and \$500 filing fee to: Executive Director Minnesota Board of Water and Soil Resources 520 Lafayette Road North St. Paul, MN 55155
--	---

4. LIST OF ADDRESSEES

<input checked="" type="checkbox"/> SWCD TEP member: Michael Schumann Ramsey Conservation District 1425 Paul Kirkwold Drive Arden Hills, MN 55112 Michael.Schumann@co.ramsey.mn.us	<input checked="" type="checkbox"/> BWSR TEP member: Dennis Rodacker MN BWSR 520 Lafayette Rd. N. St. Paul, MN 55155 dennis.rodacker@state.mn.us
<input type="checkbox"/> DNR TEP member: Jenifer Sorensen MN DNR Ecological & Water Resources 1200 Warner Rd. St. Paul, MN 55106 Jenifer.Sorensen@state.mn.us	<input checked="" type="checkbox"/> DNR Regional Office (if different): Brooke Haworth MN DNR Ecological & Water Resources 1200 Warner Rd. St. Paul, MN 55106 Brooke.Haworth@state.mn.us
<input checked="" type="checkbox"/> Applicant (notice only) and Landowner/Consultant (if different): Heather Worthington Ramsey Cty Department of Public Works 15 West Kellogg Blvd #250 Court House St. Paul, MN 55102 heather.worthington@co.ramsey.mn.us	<input checked="" type="checkbox"/> Applicant (notice only) and Landowner/Consultant (if different): Alan Rupnow Ramsey County Public Works 1425 Paul Kirkwold Drive Arden Hills, MN 55112 Alan.Rupnow@CO.RAMSEY.MN.US
<input checked="" type="checkbox"/> Members of the public who requested notice (notice only): City of Arden Hills	<input type="checkbox"/> BWSR Wetland Bank Coordinator (wetland bank plan applications only) Ken Powell MN BWSR 520 Lafayette Rd. N. St. Paul, MN 55155 ken.powell@state.mn.us
<input checked="" type="checkbox"/> Corps of Engineers Project Manager (notice only): Andrew Beaudet U.S. Army Corps of Engineers 180 East Fifth Street, Suite 700 St. Paul, MN 55101 Andrew.D.Beaudet@usace.army.mil	<input type="checkbox"/> Applicant (notice only) and Landowner/Consultant (if different):

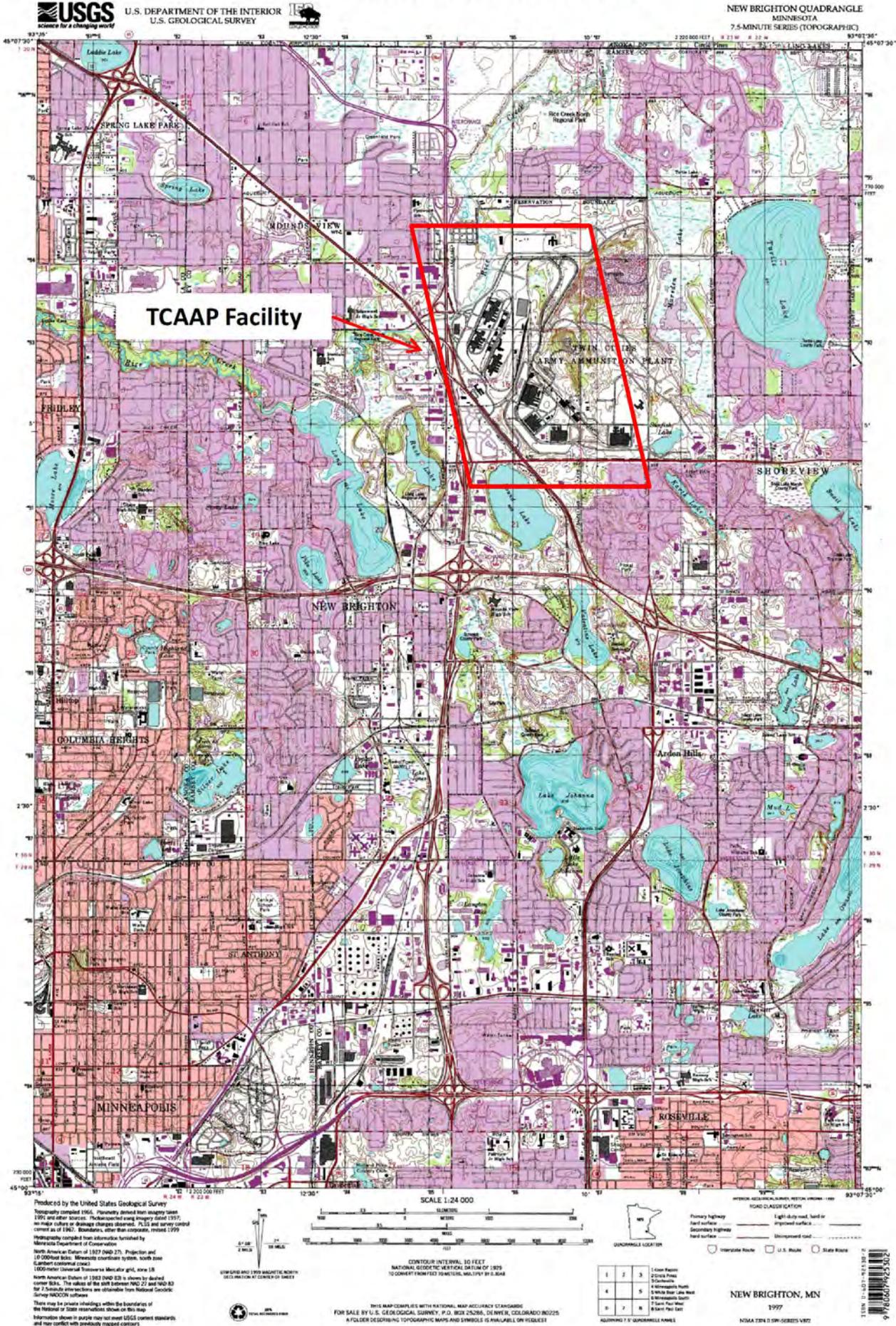
<input type="checkbox"/> Applicant (notice only) and Landowner/Consultant (if different):	
--	--

5. ATTACHMENTS

In addition to the site locator map, list any other attachments: all by Ramsey County Public Works provided in materials packet dated 12/5/2014 (RCWD received 12/9/2014)

- Figure S-6: TCAAP 2011 Aerial Map
- Figure S-7: TCAAP Northern Area Wetland Map Initial TEP Review WCA Statuses
- Figure S-8: TCAAP Mid - North Wetland Map Initial TEP Review WCA Statuses
- Figure S-9: TCAAP Mid-South Wetland Map Initial TEP Review WCA Statuses
- Figure S-10: TCAAP Southern Area Wetland Map Initial TEP Review WCA Statuses

Figure 1 – TCAAP Site Locator Map



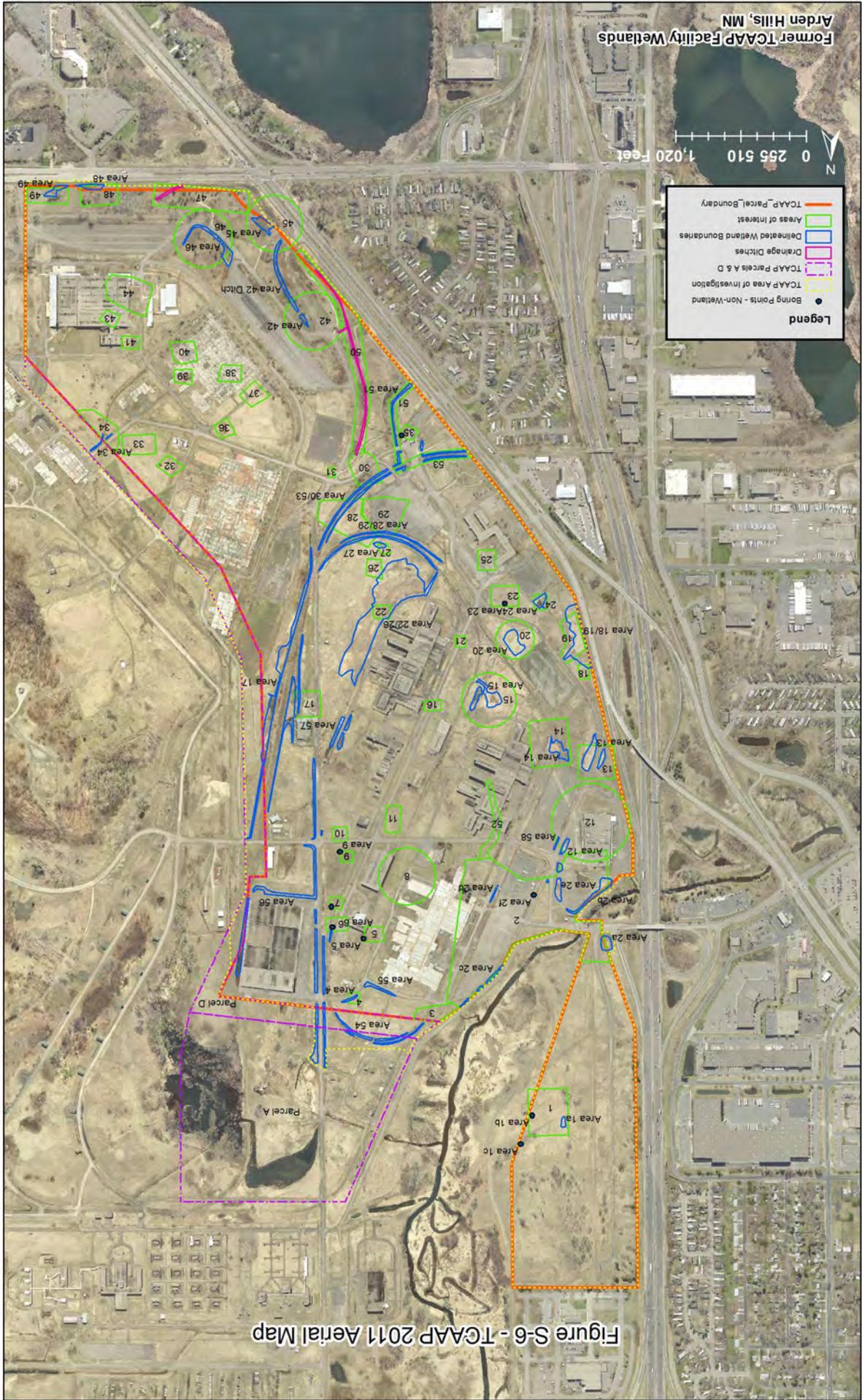


Figure S-7: TCAAP Northern Area Wetland Map
Initial TEP Review WCA Statuses



Figure S-8: TCAAP Mid-North Wetland Map
Initial TEP Review WCA Statuses

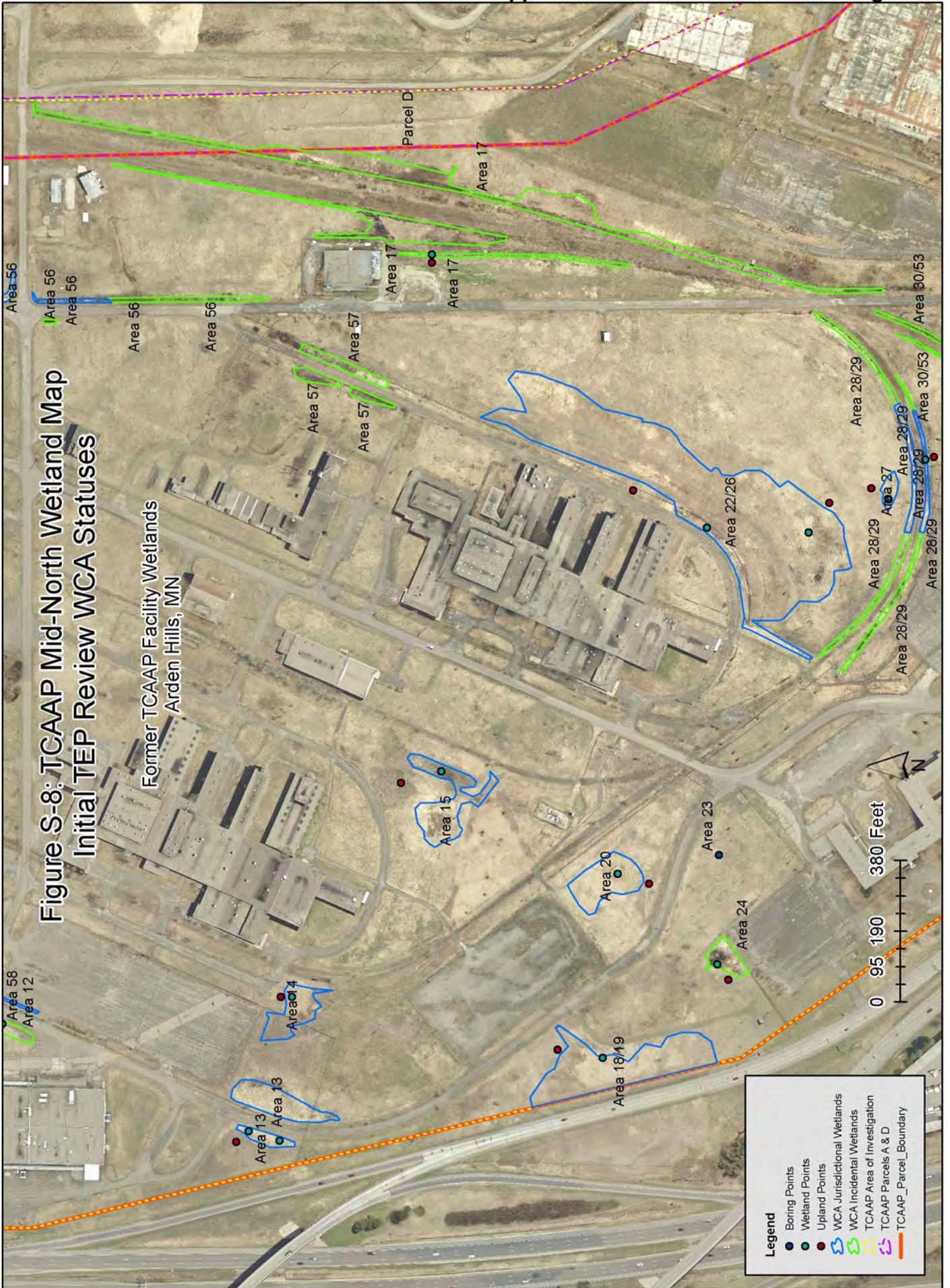
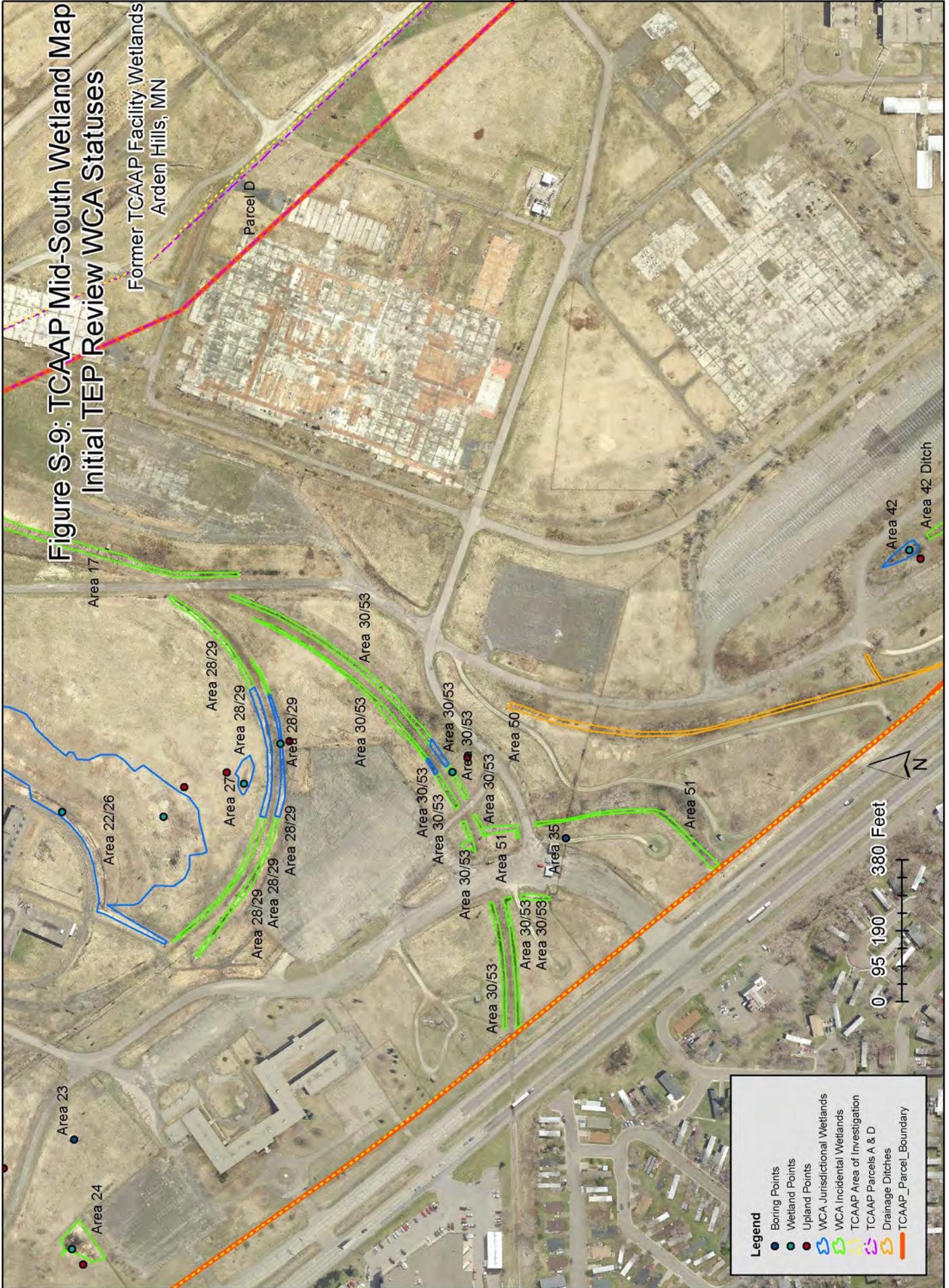


Figure S-9: TCAAP Mid-South Wetland Map
Initial TEP Review WCA Statuses



Former TCAAP Facility Wetlands
Arden Hills, MN

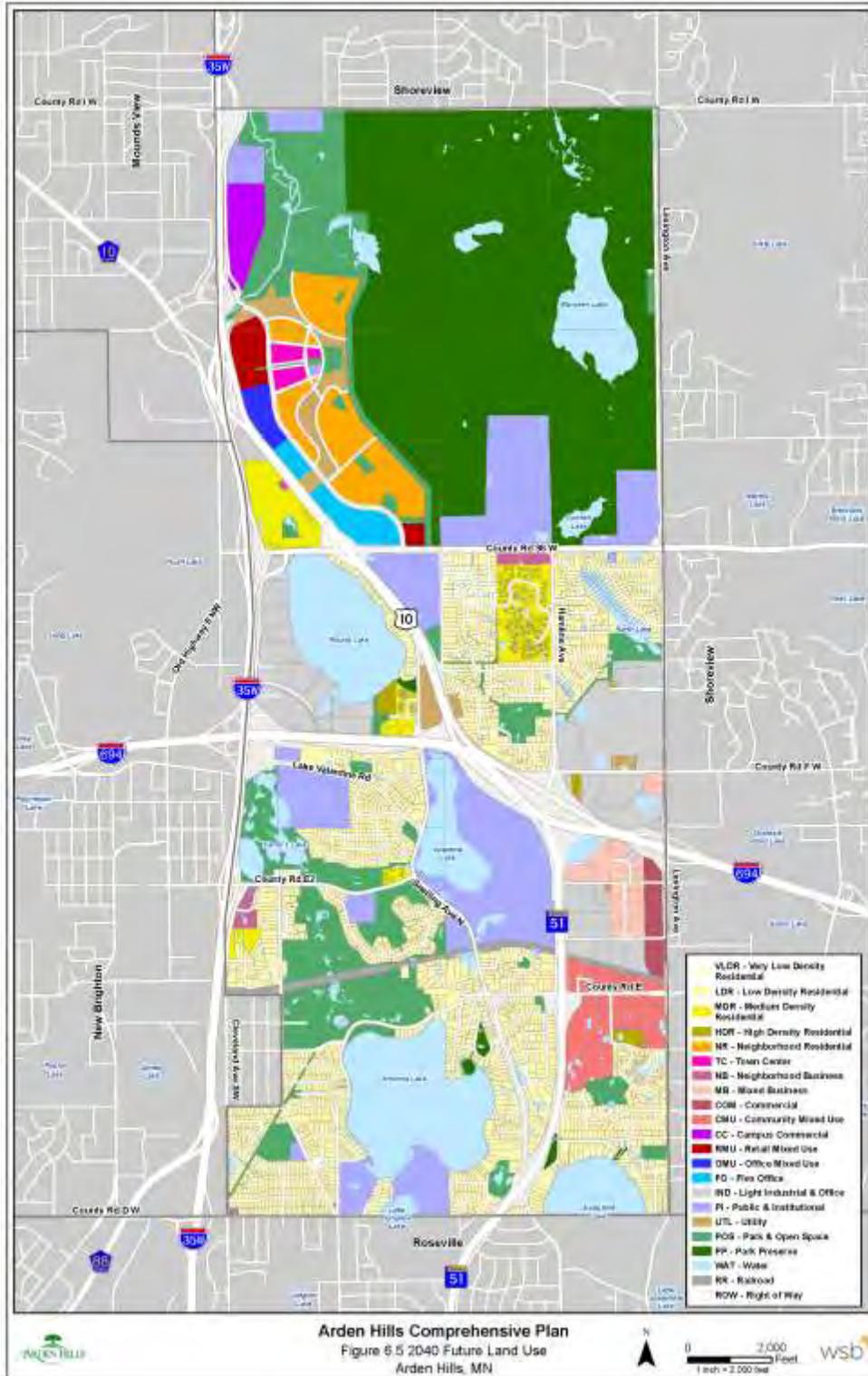
Parcel D



Legend	
●	Boring Points
●	Wetland Points
●	Upland Points
●	WCA Jurisdictional Wetlands
●	WCA Incidental Wetlands
●	TCAAP Area of Investigation
●	TCAAP Parcels A & D
●	Drainage Ditches
●	TCAAP_Parcel_Boundary

Attachment C

Land Use and Zoning Maps

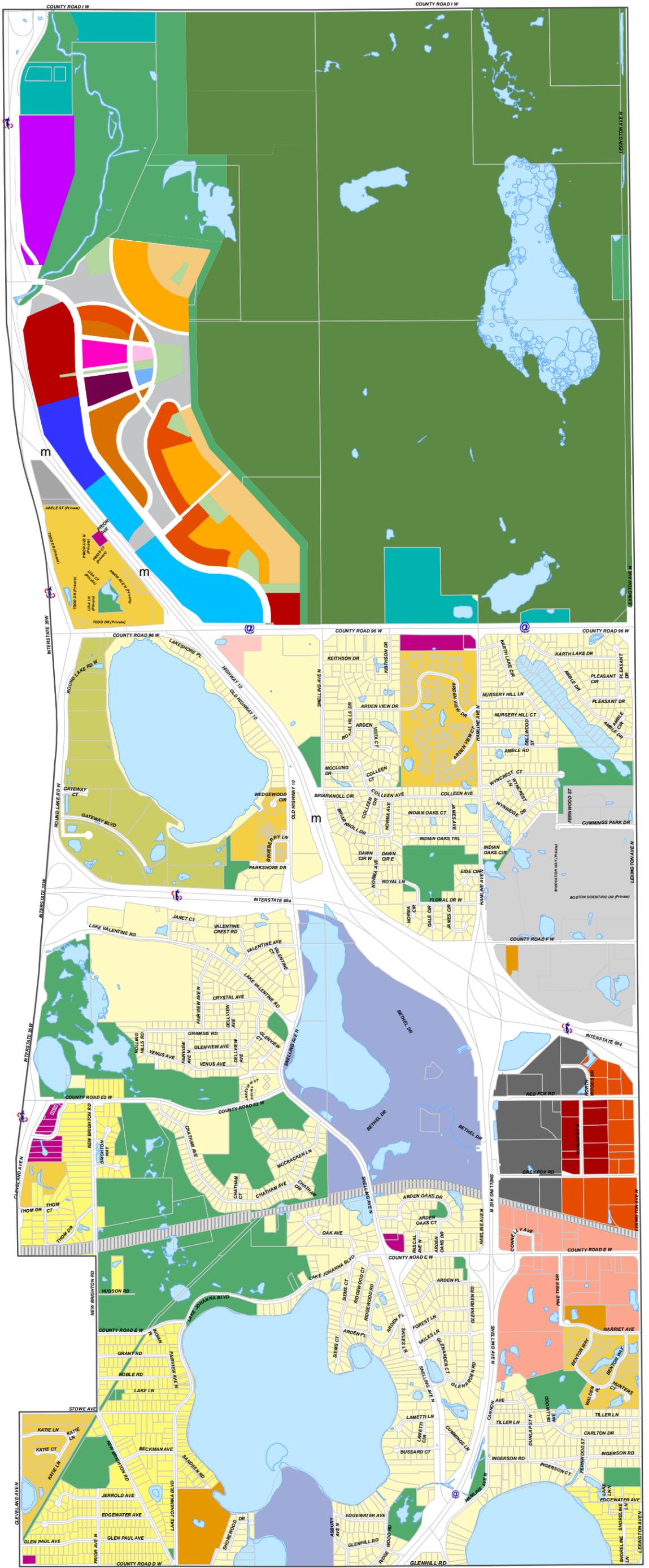


Approved: January 14, 2019



Zoning Map

- TRC CC- Campus Commercial
- TRC CO- Civil/Open Space
- TRC FO- Flex Office
- TRC RMU- Retail Mixed Use
- TRC NR-1- Residential
- TRC NR-2- Residential
- TRC NR-3- Residential
- TRC NR-4- Residential
- TRC OMU- Office Mixed Use
- TRC OS- Open Space
- TRC TC-1- Town Center
- TRC TC-2- Town Center
- TRC TC-3- Town Center
- TRC- Water Infrastructure
- R-1 - Single Family Residential District
- R-2 - Single & Two Family Residential District
- R-3 - Townhouse & Low Density Multiple Dwelling District
- R-4 - Multiple Dwelling District
- B-1 - Limited Business District
- B-2 - General Business District
- B-3 - Service Business District
- B-4 - Retail Center District
- NB - Neighborhood Business District
- CC - Civic Center District
- INST - Institutional District
- GB - Gateway Business
- I-1 - Limited Industrial District
- I-2 - General Industrial District
- I-FLEX District
- POS - Parks and Open Space District
- CD - Conservation District
- Railroad
- ROW
- WATER



The zoning district designations represented on this map correspond to the City of Arden Hills official Zoning Map. Questions concerning the Zoning Map should be directed to City Hall. Zoning designations are subject to change. Please refer to the Zoning Code for complete information.

Adopted: April 12, 1993
 Updated: October 4, 2017



Attachment D

Comments and Responses

August 8, 2019

Dave Perrault
Administrator
City of Arden Hills
1245 West Highway 96
Arden Hills, MN 55112

Re: Twin Cities Army Ammunition Plant (TCAAP) Alternative Urban Areawide Review Update

Dear Dave Perrault:

Thank you for the opportunity to review and comment on the Alternative Urban Areawide Review (AUAR) Update for TCAAP project (Project) in the city of Arden Hills, Ramsey County, Minnesota. The Project consists of 429 acre redevelopment site on the former TCAAP site. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

Water Resources

Page 7 of the AUAR Update states the 14.4 acres of wetland were assumed to be jurisdictional wetlands but later in 2104, they received an approved Jurisdictional Determination (JD) from the U.S. Army Corps of Engineers (USACE) and only three wetlands are regulated by the USACE. The city of Arden Hills should be aware that the MPCA regulates all waters of the state, and that a JD from the USACE does not excuse the City from MPCA regulation that may require mitigation for impacts to waters of the state. However, it's possible that the Rice Creek project, where the wetland impacts occurred, may have fallen under a Letter of Permission (LOP) and currently the MPCA waives all LOPs. If this is the case, then no mitigation is required for those impacts. The city of Arden Hills should check with the MPCA's 401 Program for any future wetland impacts as the rules regarding LOPs will be changing in the near future. For further information about the 401 Water Quality Certification process, please contact Jim Brist at 651-757-2245 or Jim.Brist@state.mn.us.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this AUAR Update, please contact me by email at Karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,



Karen Kromar
Project Manager
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul
Jim Brist, MPCA, St. Paul
Suzanne Hanson, MPCA, Duluth

Response to the Minnesota Pollution Control Agency

Water Resources

The City acknowledges that there are several layers of regulation regarding surface waters and wetlands at the local, state, and federal level, and that the USACE is only one of those regulating agencies that need to be considered. The USACE's jurisdictional determination was called out because it occurred after the adoption of the 2014 TCAAP Final AUAR and Mitigation Plan. The Section 404 Permit from the USACE and the Section 401 Certification from the MPCA have been added to the list of permits and approvals required (see Table 7).

August 9th, 2019

Dave Perrault
City of Arden Hills, City Hall
1245 W Highway 96
Arden Hills, MN 55112

SUBJECT: TCAAP Update
MnDOT Review # AUAR19-004
NE of US 10 and CSAH 96
St. Paul, Ramsey County
Control Section 6283

Dear Dave Perrault:

Thank you for the opportunity to review the TCAAP AUAR Update. Please note that MnDOT's review of this AUAR does not constitute approval of a regional traffic analysis and is not a specific approval for access or new roadway improvements. As plans are refined, we would like the opportunity to meet with our partners and to review the updated information. MnDOT's staff has reviewed the document and has the following comments:

Bicycle-Pedestrian:

An RBTN Tier 1 and Tier 2 Alignment pass through the area defined in the AUAR. There are also a number of trails and paths in and around the AUAR. Given the large number of residential units, retail and non-retail facilities planned in the area, MnDOT strongly recommends developing an extensive multi-user pathway network both through the area defined by the AUAR and connected with the paths and trails outside the AUAR.

Please contact Cameron Muhic at 651-234-7797 or cameron.muhic@state.mn.us with questions related to these comments.

Permits

Any work within or affecting MnDOT right-of-way will require a permit. Permit forms are available and may be submitted online at <https://dotapp7.dot.state.mn.us/OLPA>.

Please contact Buck Craig of MnDOT's Metro District Permits Section at 651-234-7911 or Buck.Craig@state.mn.us for related questions.

Review Submittal Options

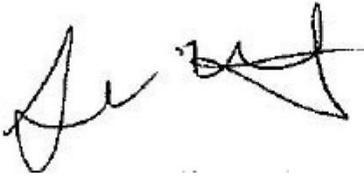
MnDOT's goal is to review proposed development plans and documents within 30 days of receipt. Electronic file submittals are typically processed more rapidly. There are four submittal options:

1. Email documents and plans in PDF format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. If multiple emails are necessary, number each message.

2. Upload PDF file(s) to MnDOT's external shared internet workspace site at: <https://mft.dot.state.mn.us>. Contact MnDOT Planning development review staff at metrodevreviews.dot@state.mn.us for access instructions and send an email listing the file name(s) after the document(s) has/have been uploaded.
3. Mail, courier, or hand deliver documents and plans in PDF format on a CD-ROM compact disc to:
MnDOT – Metro District Planning Section
Development Reviews Coordinator
1500 West County Road B-2
Roseville, MN 55113
4. Submit printed documents via U.S. Mail, courier, or hand delivery to the address above.
Include one set of full-size plans.

You are welcome to contact me at 651-234-7788 with questions.

Sincerely,



Jennifer Wiltgen
Principal Planner

E-Mail CCs:

Brian Kelly, Water Resources
Buck Craig, Permits
Ben Klismith, Right of Way
Carl Jensen, Transit
Ashley Roup, Traffic
Mark Lindeberg, Area Engineer
Cameron Muhic, Bike-Ped
Jeff Rones, Design
Russell Owen, Metropolitan Council

Response to the Minnesota Department of Transportation

Bicycle-Pedestrian

The AUAR study area is intended to be a pedestrian- and bike-friendly development. The proposed county road will carry the majority of traffic volumes on site and will be designed as a low-speed, four-lane divided section with a trail on one side and sidewalk on the other. In November 2015, Ramsey County acquired 93 additional acres of the former TCAAP site to build a bike and pedestrian trail adjacent to the AUAR study area. The multi-use trail will connect the Rice Creek North Regional Trail and the Highway 96 Regional Trail, both of which are identified as Regional Bicycle Transportation Network (RBTN) Tier 1 Alignments. The location of this trail is consistent with the RBTN Tier 2 Alignment.

Permits

Comment noted. Table 7 has been updated to reflect that a MnDOT right-of-way permit will be applied for, if needed.

Review Submittal Options

Comment noted.

August 9, 2019

Mr. Dave Perrault, City Administrator
City of Arden Hills
1245 West Highway 96
Arden Hills, MN 55112

RE: City of Arden Hills Alternative Urban Areawide Review (AUAR) Update
Metropolitan Council Review File No. 21237-3
Metropolitan Council District No. 10, Peter Lindstrom

Dear Mr. Perrault:

The Metropolitan Council received the City's TCAAP AUAR Update on July 25, 2019. The study area is a 429-acre project in the City of Arden Hills. The AUAR area consists of a mix of uses, with housing, commercial, and smaller business park developments. The study area is bounded by County Road 96 on the south, by Trunk Highway (TH) 10 and Interstate 35W (I-35W) on the west, by the State of Minnesota property on the north, and by the National Guard's Arden Hills Army Training Site (AHATS) property on the east.

Metropolitan Council staff has completed review of the AUAR Update to determine its accuracy and completeness in addressing regional concerns. Staff concludes that the AUAR Update is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. However, staff offers the following comments for your consideration:

Item 3. Development Scenarios (*Eric Wojchik, 651-602-1330*)

For reference, Item 3 does not adequately identify the maximum development scenario assessed in the 2014 AUAR: 2,500 residential units, 550,000 square feet of retail, and 1,950,000 square feet of non-retail commercial. The addition of this information would add clarity to the document.

Item 4.2.1 Land Use (*Eric Wojchik, 651-602-1330*)

Given the development scenarios identified in the 2014 AUAR and subsequent changes in land use since that time, it is unclear how the development scenarios, which the AUAR Update identifies as unchanged, relate to the new land uses within the study area. Page 5 of the AUAR states, "both development scenarios would be compatible with the future land use identified in the Draft 2040 Comprehensive Plan. No mitigation measures are necessary." More information should be added to the Land Use section of the Update to discuss how the revised land uses relate to the development scenarios from the 2014 AUAR.

Land Use/Zoning Maps (*Eric Wojchik, 651-602-1330*)

Land use and zoning maps should be included within the AUAR. The AUAR Update does not include these maps, and such information should be added to the document.

Transit (Stephen Baisden, 612-349-7361)

As stated in the AUAR, the project is anticipated to be completed in phases over the next 10 - 20 years. Given the current transit investments in the area, the low residential density that exists in this area now, the moderately low-density (depending on the City's proposed zoning district) residential development that is proposed with this AUAR Update, and the longer timeframe of overall development, this master planned development will likely have some ridership impact on nearby existing transit routes but not enough to warrant implementation of new transit service.

The Council will not take formal action on the AUAR. If you have any questions or need further information, please contact Eric Wojchik, Principal Reviewer, at 651-602-1330.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Peter Lindstrom, Metropolitan Council District No. 10
Eric Wojchik, Principal Reviewer/Sector Representative
Raya Esmaeili, Reviews Coordinator

Response to the Metropolitan Council

Development Scenarios

A table that outlines the development scenarios has been added to Section 3 (see Table 1).

Land Use

Table 2 has been updated to include a column that correlates the planned land uses from the Draft 2040 Comprehensive Plan to the development scenario components (residential, retail, and non-retail commercial). The planned land use map from the Draft 2040 Comprehensive Plan and the City's zoning map have been added as Attachment C.

Transit

Comment noted.

Friday, August 09, 2019

Dave Perrault
City Administrator
1245 W Highway 96
Arden Hills, MN 55112
BY EMAIL: dperrault@cityofardenhills.org



RE: comments on TCAAP AUAR Update

Dear Mr. Perrault:

The Alliance for Metropolitan Stability is a coalition of community-based organizations from the Twin Cities metro area working together to promote racial, economic, and environmental justice. We wish to make the following comments regarding your recent updates to the TCAAP site's Alternative Urban Areawide Review (AUAR) document.

We believe that the AUAR Update fails to address two issues raised by developments subsequent to publication of the AUAR five years ago. The two issues are: 1) failure to discuss the relationship of TCAAP project plans to the proposed A Line Bus Rapid Transit (BRT) extension to the TCAAP site discussed in the original AUAR and in the City's 2040 Comprehensive Plan; 2) the conflict between TCAAP project plans and the City's Land Use Plans set out in the 2040 Comprehensive Plan.

Failure to Discuss TCAAP Plan Implications for Bus Rapid Transit

The AUAR, at pg. 29, briefly discussed the potential A Line BRT extension to the TCAAP site. Subsequent to adoption of the AUAR five years ago, the City has submitted its 2040 plan for Met Council review. On page 11-23 the Plan notes that it is important for the community to plan for the ability to accommodate multimodal activities such as transit. The first such project discussed, at page 11-24, is the potential A Line extension to the TCAAP site. The discussion there notes that while resources are currently not available for development of the A Line extension "the City, Ramsey County, private developers and Metro Transit can plan for and implement transit oriented development and other transit ready infrastructure to support the A Line BRT extension to TCAAP." A map of the proposed extension is set out at page 11-25, showing two station areas at the TCAAP site.

As noted in the Comprehensive Plan, the A Line extension will require additional transportation funding for the metro area. The Metropolitan Council will be responsible for funding the A Line extension. The Council's Transportation Policy Plan sets out factors to be considered in establishing funding priorities should this additional funding be available. These factors include equity/service to low income populations (Table 6-3, pg. 6.34), station area housing density and "a mix of affordable housing" (Table 6-5, pg 6.57), and local government support and land use commitments (Table 6-6, pg. 6.58). Table 3-2 at page 3.23 sets out minimum land use planning

standards. For arterial BRT service such as the A Line extension, the minimum station area density is 15 du/acre and the target is 20-60du/acre.

Also subsequent to City adoption of the AUAR, project plans have become more detailed, with the City adopting Goals for the development included in the Solicitation for a Master Developer and the Joint Development Authority (JDA) adopting a Master Development Agreement (MDA) summary setting out detailed requirements for redevelopment of the site.

These more detailed plans for redevelopment make highly unlikely Metropolitan Council prioritization of the A Line extension, and thus realization of this multimodal transit alternative benefitting the site. The project as planned calls for only 10% of the TCAAP units to be “affordable” and only then at 80% of Area median Income (AMI). This is not “a mix of affordable housing” that the Metropolitan Council requires for transit station areas. It excludes the vast majority (about 85%) of Ramsey County households with housing problems and cost burdens-those with incomes no greater than 50% of AMI.¹ This exclusion of very low and extremely low income households from project plans has severe consequences for regional equity, eliminating housing opportunities disproportionately for households of color which are about 4 times as likely as white, non-Hispanic households to be in the most serious need of housing affordable at or below 50% of AMI. As to the Council’s station area density concerns the station area indicated as TCAAP South on the Comprehensive Plan map will certainly not meet the 15 du/acre requirement as it is a single family area. It is impossible to determine the extent to which Council requirements would be met for the north station area without a detailed analysis which is entirely lacking from the AUAR.

The EQB regulation at 4410.3610 Subp. 4 requires the AUAR content to be similar to that required of an EAW, but with a level of analysis comparable to that of an EIS with respect to direct, indirect, and cumulative potential effects typical of developments such as TCAAP. The EAW Worksheet requires, at 18.b., a discussion of the projects impact on the regional transportation system. The AUAR guidance requires, at 27, a discussion of the proposed development in the context of the comprehensive plan and at 28 of the impact on public services.

There was no discussion at all in the AUAR Update of the probable effects of City-imposed limitations on project density and affordability in the TCAAP plans on mass transit options for the TCAAP redevelopment which were discussed in the Comprehensive Plan. That failure renders the AUAR Update inconsistent with EQB environmental review requirements.

Failure to Discuss Compatibility of TCAAP Plans With the City’s Comprehensive Plan

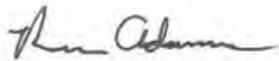
As noted above, item 27 of the AUAR guidance requires a discussion of the proposed redevelopments in the context of the City’s Comprehensive Plan. Further, item 9 of the AUAR guidance refers to the Land Use requirements in item 9 of the EAW form. Item 9.b. requires a discussion of the project’s compatibility with the Comprehensive Plan. The incompatibility of project plans set out in the JDA-adopted MDA amendment with the discussion of Bus Rapid Transit in the Comprehensive plan was discussed above.

¹ HUD CHAS data for 2011-2016 at <https://www.huduser.gov/portal/datasets/cp.html>

There is a closely related incompatibility. As noted above, the City's policy for TCAAP redevelopment and the MDA summary have 10% of the units produced affordable at 80% of AMI. In stark contrast, the Land Use section of the adopted Comprehensive Plan indicates that the Town Center zoning in the TCAAP site was adopted to "ensure" that at least 229 units affordable at or below 50% of AMI would be developed on the site. The Land use section goes on to indicate that most of the units to be produced at 80% of AMI, however, would be produced outside of the TCAAP site. As noted above, this failure of the actual plans for redevelopment of the site to match the Land Use section of the Comprehensive Plan has significant consequences for the ability of the City, County, and developers to attract mass transit to serve the new TCAAP site residents. For this reason also, the AUAR update fails to meet EQB environmental standards.

You are probably aware that the Alliance has moved to intervene in the current lawsuit between the City and Ramsey County in order to bring a Fair Housing Act complaint. You should be aware that the Alliance takes seriously the concerns for affordable housing and regional equity cited above by the Metropolitan Council and is therefore also considering litigation involving the AUAR and the Comprehensive Plan.

Yours truly,

A handwritten signature in black ink, appearing to read "Russ Adams". The signature is fluid and cursive, with a long horizontal stroke at the end.

Russ Adams
Executive Director

Response to The Alliance for Metropolitan Stability

Failure to Discuss TCAAP Plan Implications for Bus Rapid Transit

After adoption of the 2014 AUAR, the A Line Corridor Extension Evaluation was completed by Metro Transit in September 2016.⁸ Metro Transit's study noted that the A Line extension service area would likely need substantial land use change (and revised employee home locations) *throughout* the corridor to achieve even minimum required levels of service productivity to meet the estimated incremental operating cost. A phased approach of improved local service and future, phased BRT service may provide a path toward sufficient service productivity to sustain service, while also supporting land use goals and transportation needs in the corridor. The Metropolitan Council's 2040 Transportation Policy Plan (adopted October 24, 2018) does not include the A Line extension as part of its' Current Revenue Scenario; therefore, it is not addressed in the AUAR Update.

Failure to Discuss Compatibility of TCAAP Plans with the City's Comprehensive Plan

The Minnesota Environmental Quality Board's document titled "Recommended Content and Format: Alternative Urban Areawide Review Documents"⁹ states that the anticipated types (single or multiple family) and intensity (density) of residential and commercial/warehouse/light industrial development throughout the AUAR area should be given for each development scenario. The defined development scenarios are consistent with that guidance. Specific housing cost types are not typically defined in an AUAR or EAW.

As noted in Chapter 7: Housing of the Draft 2040 Comprehensive Plan,¹⁰ the Metropolitan Council's long-range plan for the region (Thrive MSP 2040) states that communities must guide a sufficient amount of land at minimum densities to provide opportunities for affordable housing to be developed. Communities have two options to provide this density: Option 1 is to guide sufficient land at a minimum of 8 dwelling units per net acre (du/ac), and Option 2 is to guide sufficient land at a minimum of 12 du/ac for the affordable housing allocation of 50% Area Median Income (AMI) and below and sufficient land at a minimum of 6 du/ac for the affordable housing allocation between 51% and 80% AMI. Arden Hills has proposed to use Option 2 to achieve the affordable housing allocation. For more information, see Chapter 7: Housing of the Draft 2040 Comprehensive Plan.

⁸ Available at https://www.metrotransit.org/Data/Sites/1/media/abrt/aline/20160913_final-a-line-extension-evaluation.pdf.

⁹ Available at [https://www.eqb.state.mn.us/sites/default/files/documents/AUAR%20guidance%20\(form\)%20-9-09.pdf](https://www.eqb.state.mn.us/sites/default/files/documents/AUAR%20guidance%20(form)%20-9-09.pdf).

¹⁰ Available at <https://www.cityofardenhills.org/451/2040-Comprehensive-Plan>.

August 19, 2019

City of Arden Hills
Attn: Dave Perrault, City Administrator
City Hall
1245 W. Highway 96
Arden Hills, MN 55112

RE: AUAR Update - Twin Cities Army Ammunition Plant
T30 R23W S9, 16
Arden Hills, Ramsey County
SHPO Number: 2019-2211

Dear Mr. Perrault:

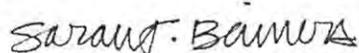
Thank you for consulting with our office during the preparation of an Alternative Urban Areawide Review.

Based on our review of the project information, we conclude that there are no properties listed in the National or State Registers of Historic Places. Also, there are no known or suspected archaeological properties in the area that will be affected by this project, provided that archaeological site 21RA0022, which is outside but adjacent to the AUAR boundary, is protected from disturbance. This site previously has been determined to be eligible for listing in the National Register of Historic Places.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

Please contact our Environmental Review Program at (651) 201-3285 if you have any questions regarding our comments on this project.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

Response to the State Historic Preservation Office

Thank you for your review of the subject document.