MAYOR AND COUNCIL COMMUNICATION

DATE: 12/06/2016
Regular Item
ITEM #: 17

AGENDA ITEM: Royal Golf Environmental Assessment Worksheet (EAW) Comments

SUBMITTED BY: Stephen Wensman, Planning Director

THROUGH: Kristina Handt, City Administrator

REVIEWED BY: N/A

BACKGROUND:

According to State Statutes, the Royal Golf Residential Development is required to prepare a mandatory EAW. A draft of the EAW was prepared by the developer and accepted by the City for advertisement with the Environmental Quality Board on October 24, 2016. The advertisement triggered a 30 day comment period. To keep the City Council informed, Staff has provided the Council with this memorandum the comments received by the public and government agencies during the 30 day comment period which ended on November 23, 2016. The City has 30 days in which to respond to the comments received and to determine whether a more involved Environmental Impact Statement is required. It is anticipated that the response to the comments will be drafted and reviewed by City Staff for the City Council at its December 20, 2016 meeting. If there are any delays in the ability to respond, the City may postpone its decision to gather critical missing information for up to 30 days or a longer period if agreed to by the developer; the decision must be documented in written record of decision.

The EAW has no impact on the comprehensive plan amendment, but does need to be approved by the City Council prior to approving the preliminary plat for the development.

RECOMMENDATION:

There is no recommendation. This item is for informational purposes only.

ATTACHMENTS:

- EAW comments - Public and agency

November 21, 2016

Stephen Wensman, Planning Director
City of Lake Elmo
3800 Laverne Avenue North
Lake Elmo, MN 55042

RE: City of Lake Elmo Royal Golf Club Residential Development Environmental Assessment Worksheet (EAW)
Metropolitan Council Review No. 21630-1
Metropolitan Council District No. 12

Dear Mr. Wensman:

The Metropolitan Council received the EAW for the Royal Golf Club Residential Development project in the City of Lake Elmo on October 21, 2016. The proposed project is located 222.2 gross acres located between 10th Street North and 20th Street North, and bounded by Manning Trail on the East and by Lake Elmo Avenue on the west. The proposed development includes 292 single-family detached homes connected to municipal water and sanitary sewer on approximately 198.3 net acres, with approximately 90.8 acres reserved as private open space. The proposed project is located on the site formerly owned by 3M and previously a part of Tartan Park golf course.

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 Council policies. An Environmental Impact Statement (EIS) is not necessary for regional purposes.

We offer the following comments for your consideration.

Item 8 – Permits and Approvals Required (LisaBeth Barajas, 651-602-1895)
As of the date of this review letter, the City's overall planned density (including all previous amendments) is 3.25 units per acre. The proposed development brings the City's overall density down to 3.05 units per acre, which remains consistent with the Council's density policy of 3 units per acre for Emerging Suburban Edge communities.

As noted in the EAW, a comprehensive plan amendment will be needed should the City decide to move forward with the proposed development. The proposed amendment should make any necessary changes to land use to support the ultimate development concept, as well as provide updates to the wastewater and MUSA sections of the comprehensive plan to show this area as within the service area as well as projected flows from the development. As City and Council staff have discussed, a comprehensive plan amendment will need to be submitted to the Council for review and authorization to before moving forward with this development.

In accordance with Minnesota Statute Section 473.513, at the time the project proposer makes application to the Minnesota Pollution Control Agency (MPCA) for a permit to construct each segment of sanitary sewer for the proposed project, a copy of the plans, design data, and a location map of the project will also need to be submitted to the Metropolitan Council. The Council's Environmental Service Municipal Services staff will need to review, comment, and

recommend issuance of the construction permit by the MPCA before connection can be made to the City's wastewater disposal system.

Forecasts (Todd Graham, 651-602-1322)
Forecasts by Transportation Analysis Zone (TAZ) are not discussed in the EAW, but this information would be helpful as part of the City's comprehensive plan should they move forward with this development. The Metropolitan Council has prepared a draft set of TAZ forecasts for 2040, which is available for local government review.

The Royal Golf Club site is within TAZ #2403. The zone is currently forecasted to gain +36 households during the period from 2010-2040. Council staff recommend adding +250 households, +700 population to the TAZ #2403 forecast. Balancing adjustments can be made to the TAZs elsewhere in the community. The City can update the TAZ forecast through correspondence with Metropolitan Council staff.

Council staff opinion is that the proposed development fits within the community total forecast prepared by the Council' no change is needed to the community total forecast.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact me at 651-602-1895.

Sincerely,

Patrick Boylan for:
LisaBeth Barajas, Manager
Local Planning Assistance

CC: Steve O'Brien, MHFA
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Harry Melander, Metropolitan Council District 12
Raya Esmaeili, Reviews Coordinator

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Minnesota Historical Society

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MINNESOTA HISTORIC PRESERVATION OFFICE

November 17, 2016

Stephen Wensman
Planning Directory
City of Lake Elmo
3800 Laverne Ave N
Lake Elmo, MN 55042

RE: EAW – The Royal Golf Club Residential Development
Minneapolis, Hennepin County
MnHPO Number: 2017-0292

Dear Mr. Wensman:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

According to Item No. 14 "Historic Properties" in the EAW, the developer has hired a cultural resources consultant to conduct a Phase I archaeological survey prior to development. We look forward to receiving and reviewing the results of this survey, once the report becomes available.

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 permit or license, it should be submitted to our office by the responsible federal agency.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

Minnesota Historical Society

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MINNESOTA HISTORIC PRESERVATION OFFICE

November 17, 2016

Stephen Wensman
Planning Directory
City of Lake Elmo
3800 Laverne Ave N
Lake Elmo, MN 55042

RE: EAW – The Royal Golf Club Residential Development
Minneapolis, Hennepin County
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Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | Use your preferred relay service | info.pca@state.mn.us | Equal Opportunity Employer

November 23, 2016

Mr. Stephen Wensman
Planning Director
City of Lake Elmo
3800 Laverne Avenue North
Lake Elmo, MN 55042

Re: Royal Golf Club Residential Development Environmental Assessment Worksheet

Dear Mr. Wensman:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Royal Gulf Club Residential Development project (Project) located in the city of Lake Elmo, Washington County, Minnesota. The Project consists of the preparation of 222 acres of land for residential development. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Permits and Approval Required (Item 8)
The table in this section of the EAW does not include the MPCA 401 Water Quality Certification.

Water Resources (Item 11)

- Specific in-water best management practices such as silt curtain, construction during low flow or winter conditions, cofferdam, or check-dams, etc. should be included in the EAW. Please note that isolated wetlands remain under MPCA jurisdiction as waters of the state and mitigation may be required. Wetland evaluation is on a case-by-case basis.

- It appears that the golf course will continue to use groundwater for potable, irrigation, fire protection, and maintenance use. It is important to note that the location of this development lies within known areas of aquifer contamination. The development overlies a perfluorochemical groundwater plume that has impacted groundwater quality in each of the primary drinking water aquifers present. Recent groundwater monitoring in the area of Horseshoe Lake has indicated the presence of perfluorochemicals at levels in excess of U.S. Environmental Protection Agency (EPA) health advisory levels.

  Less than 1 mile to the north and east of the development lies the Trichloroethene (TCE) groundwater plume associated with the Baytown Township Groundwater Plume Site. The TCE plume has impacted groundwater quality in each of the primary drinking water aquifers present.

Care should be exercised when using groundwater in this region for potable and irrigation purposes. The EPA recently issued significantly lower health advisory levels for several perfluorinated substances. Because the specific configuration of the groundwater plumes in the area are not well understood and likely vary over time, it is not possible to accurately predict whether a well that has been clear of contamination in the past will remain clear of contamination in the future.

Lake Elmo, Horseshoe Lake, several small drainage ponds, and ditches within the golf course area and further downstream have been shown to be contaminated with perfluorochemicals at levels in excess of EPA health advisory levels. Care should be exercised when using surface water from these areas for irrigation purposes so as to minimize the potential for human and environmental exposure to these contaminants.

Contamination/Hazardous Materials/Wastes (Item 12)

This section refers to a natural gas pipeline that runs across part of the site. The Project proposer should contact the Office of Pipeline Safety to determine the appropriate setbacks for this structure.

The Investigation History refers to a "Possible on-site disposal area that was later confirmed to be located on the adjoining property to the southeast..." This disposal area is not identified on any maps. Please clarify if the disposal area has been reported to the MPCA or State Duty Officer. Please provide the location of the disposal area.

The section regarding "PFCs and Area Groundwater Contamination" does not capture the potential risks posed by groundwater contaminated by the PFC sources. The plume of groundwater contaminated with perfluorochemicals appears to extend beneath the site and further toward the east.

The golf course well sampling results referred to do not comply with routine compliance sample results reporting protocols. There is no indication regarding any quality control aspects of the results. If this data is intended to be used for this report, please provide an adequate presentation of the data. A summary table deep within an appendix is not an appropriate presentation of such data. Assuming that this is an oversight, the results do indicate that there are a number of perfluorochemicals present in the samples. However, the regulatory limits referred to are no longer current. The EPA issued revised drinking water criteria in 2016.

The EAW does not discuss how soil contaminated with materials other than agricultural chemicals will be handled. The MPCA recommends that the site be entered into the MPCA Brownfield Program (formerly called the Voluntary Investigation and Cleanup Program) in order to provide regulatory oversight with regard to non-agricultural related contamination issues. Accidental spills or releases from on-site equipment, buried rubble, municipal solid waste, buried demolition waste, etc. are situations regulated by the MPCA. The Brownfield Program provides technical assistance and issuance of various liability assurance letters to promote the investigation, cleanup, and redevelopment of property that is contaminated with petroleum and/or hazardous substances.

We appreciate the opportunity to review the Project. Please provide the 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 EAW, please contact me via email at Karen.kromar@state.mn.us or via telephone at 651-757-2508.

Sincerely,

Karen Kromar
Planner Principal
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul
Bill Wilde, MPCA, St. Paul
Greg Small, MPCA, St. Paul
Teresa McDill, MPCA, St. Paul

November 23rd, 2016

Stephen Wensman
Planning Director
City of Lake Elmo
3800 Laverne Avenue North
Lake Elmo, MN 55042

Dear Mr. Wensman,

Thank you for providing the Minnesota Department of Health (MDH) with the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the Royal Golf Club Residential Development project. The mission of MDH is to protect, maintain, and improve the health of all Minnesotans. The careful planning and development of projects such as this one supports this mission and is an important step in ensuring health in all policies.

MDH does have several comments regarding groundwater, water quality, and soil contamination at and near the site:

Section 10 – "Geology"

Although no sinkholes have been identified on the project property, the Minnesota Geological Survey (MGS) karst inventory does map one sinkhole less than one mile northeast of the project property, just north of the intersection of Manning Avenue and 27th St. N. (UTM coordinates 510846/4981836). Depth to carbonate bedrock is an important factor in the potential for karst development, with that potential increasing significantly where depths are less than 50 feet (Alexander, et al. , 2003, "Sinkholes, Sinkhole Probability, and Springs and Seeps", Goodhue County Atlas, County Atlas Series, Atlas C-12, Part B, Plate 10). Well logs near the east property boundary of the project area indicate depth to bedrock is approximately 47-59 ft. (unique well numbers: 442166, 447252, 431201, and 503306). Two infiltration areas and two stormwater ponds are planned near the northeast corner of the project property (as shown on Figure 7). Consideration should be given to potential karst development beneath these infiltration areas and whether any mitigation measures are needed, particularly given the proximity of these areas to planned home construction.

Section 11 – "Water Resources"

The groundwater discussion should include more information regarding the perfluorochemical (PFC) contamination in the groundwater in this area. Groundwater has been impacted by PFCs from the former Washington County Landfill and 3M-Oakdale Disposal Site. Due to groundwater flow, surface water-groundwater interactions, and stormwater management activities, the groundwater east of Lake Elmo has been impacted by PFCs emerging from these disposal areas. Recent MDH sampling has detected PFCs at concentrations above the new Environmental

Protection Agency (EPA) Lifetime Health Advisory levels of 70 parts per trillion for PFOS and PFOA in the surface water in Lake Elmo, the unnamed creek that discharges from Lake Elmo onto the project property, Horseshoe Lake, and the series of ditches and stormwater ponds further downstream. Surface water ponds on the property that are part of the Project 1007 drainage system are almost certain to be similarly impacted. The full extent and distribution of PFCs in this portion of Lake Elmo are still being determined. Use of surface water or groundwater at the project site should be carefully managed to avoid human exposure and prevent further spreading of the contamination. MDH further recommends landscaping options be implemented to create significant buffers in order to restrict public access to Horseshoe Lake.

Preliminary data suggests PFC contamination is primarily in the Prairie du Chien aquifer (OPDC), but excessive use of Jordan aquifer (CJDN) wells may cause downward migration of the contamination, potentially placing downgradient CJDN wells at risk. MDH recommends the project proposer work with MDH, MPCA, and DNR to evaluate water quality in the existing wells and surface waters on the project property and determine appropriate use of these to mitigate for these potential impacts.

Section 12 – "Contamination/Hazardous Materials/Wastes"

The sub-section titled "Investigation History" indicates a "disposal area" is located on an adjoining property to the southeast. The location is not shown on any figures and no information is provided regarding this disposal area and its proximity to the project property.

The sub-section titled "Response Action Plan" indicates that contaminated soils excavated at the site are to be managed in a "Regulated Soil Management Area" beneath a 2 ft. cover. The figure shown in the Phase II Investigation Report (Appendix D) indicates the area proposed for this management area has a significant slope and may be prone to erosion. MDH assumes MPCA will be consulted in the design and construction of this facility to ensure it provides long-term encapsulation of these soils to prevent exposures.

The sub-section titled "PFCs and Area Groundwater Contamination" (page 27) should be revised to reflect that PFCs above levels of health concern are present in the groundwater in this part of Lake Elmo. Although the concentrations detected in the CJDN wells on the property do not exceed levels of health concern, as noted above continued extraction of water from the CJDN may result in increased PFCs in this aquifer over time.

Appendix D – Table 3

Although the table correctly identifies the current MDH Health Risk Limits for PFOS, PFOA, PFBA, and PFBS, it should be noted that MDH now uses the new EPA health advisory levels of 70 ng/L for PFOS and PFOA when evaluating health risks.

Health starts where we live, learn, work, and play. To create and maintain healthy Minnesota communities, we have to think in terms of health in all policies. Thank you again for the opportunity to provide comments on this EAW for the Royal Golf Club Residential Development project. Feel free to contact me at (651) 201-4907 or david.bell@state.mn.us if you have any questions regarding this letter.

Sincerely,

David Bell
Environmental Review Coordinator
Environmental Health Division
Minnesota Department of Health
PO Box 64975
Saint Paul, MN 55164-0975

MINNESOTA DEPARTMENT OF NATURAL RESOURCES
CENTRAL REGION
1200 WARNER ROAD
SAINT PAUL, MN 55106
651-259-5800

November 22, 2016 Transmitted electronically

Stephen Wensman
3800 Laverne Ave. N.
Lake Elmo, MN 55042

RE: The Royal Golf Club Residential Development EAW

Dear Stephen Wensman,

The Minnesota Department of Natural Resources (MNDNR) has reviewed the Environmental Assessment Worksheet (EAW) for the Royal Golf Club Residential Development EAW.

General Comments
To date, MNDNR has provided formal comments on the concept PUD to the City of Lake Elmo and informal comments to the developer on the PUD density analysis. These comments have been based on the assumption that the PUD will have City water and sewer. MNDNR will formally review the preliminary PUD and plat when these are submitted to the City, to determine if they meet the PUD provisions in State shoreland rules.

MNDNR review of shoreland PUDs looks for consistency with the density allowances, setbacks, and height as well as a variety of more subjective performance standards dealing with protection of vegetation and sensitive slopes. While we look for compliance with the numerical standards, we recognize that good environmental design cannot be reduced to compliance with a set of numbers. The shoreland PUD standards were part of the 1989 State shoreland rules and were an early form of conservation design regulations. A lot has been learned about conservation design since 1989 and many communities in Minnesota have adopted different shoreland PUD standards to limit density, ensure better natural resource/open space protection, and provide for greater alignment with the community's vision.

MNDNR has concerns on the design of the Royal Golf Club Residential PUD because the proposed development is too dense for the natural resources on the site. In making this evaluation, MNDNR is considering overall project suitability by looking at how the design impacts the existing natural environment on the site. From our perspective, a development is not suitable if it is consuming areas of high quality vegetation and areas with slopes greater than 12 percent (which MNDNR considers steep slopes). Ultimately, however, it is up to the City of Lake Elmo to evaluate project suitability, natural resource protections, and transportation concerns associated with this proposal.

Specific Comments

- Page 3 - Rewrite the statement on page 3 so that it does not imply that the City has determined that this project meets shoreland overlay district requirements. At this stage of the PUD process, it is premature to state that the proposed project design complies with shoreland overlay district requirements. The City of Lake Elmo has not approved this development yet nor has the City

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fully evaluated whether the development plans are in conformance with City ordinances and State shoreland rules.

- Page 3 states that this project minimizes effects on floodplains. However, page 10, states that there will be about 15.6 acre-feet of fill in the flood fringe to accommodate 15 residential lots and streets. The statement on page 3 is misleading since there will be significant changes to the existing floodplain configuration. What layout design modifications could be made to avoid the need for floodplain fill and rerouting of flood waters into storage ponds? How will floodplain storage outside of the PUD boundary be managed (i.e., who will own and maintain these storage ponds)?
- Page 3 – Please correct the MNDNR PWI # for the unnamed public water wetland from 82-117W to 82-417W. The MNDNR ID # for the unnamed public watercourse is M-050-009-001.
- Page 8 states that the City's ordinance requires only two conditions to be met to allow for PUDs (the City's PUD ordinance and the State shoreland PUD rules). PUDs, by their very nature, are a negotiation between the local government and the proposer. The City, through the PUD process, can require additional conditions in exchange for the increased density that is allowed under a PUD. Through the PUD process and negotiations with the developer, the City can also exert influence on how a property is developed and what the design of that development looks like. For example, the City can require greater tree preservation, slope/erosion protection, interconnectivity, conservation easements, or other environmental or public benefits.
- Page 9 and Appendix A - Please update the shoreland PUD suitable area, open space, and density calculations (Tables 5 and 6 and Appendix A) to match those numbers provided in analyses completed after the submittal of the EAW. Include with this analysis a map showing areas suitable for development and those areas not suitable for development and their acreages. Also include with this analysis a map showing areas of open space and those areas not included in open space and their acreages.
- Page 11 states that the proposed project is compatible with surrounding land uses. Describe in more detail in what ways the PUD's design plan is compatible with surrounding land uses. Please provide more detail on the preservation of forest buffers and how they provide compatibility with surrounding land uses. Has this proposal considered ways to preserve existing forest areas to allow for plant and wildlife preservation?
- Figure 7 – Please show the location of steep slopes on Figure 7, to help the reader determine the location of proposed lots, structures, and roads in relation to steep topographic areas.
- Has a tree preservation and replacement plan been prepared for this proposed development that meets City ordinance?

Thank you for the consideration of our comments.

Sincerely,

/s/ Rebecca Horton
Regional Environmental Assessment Ecologist – Central Region
Division of Ecological and Water Resources

November 11, 2016

Mr. Stephen Wensman
Planning Director
City of Lake Elmo
3800 Laverne Avenue North
Lake Elmo, MN 55042

Re: The Royal Golf Club Residential Development (EAW)

Dear Mr. Wensman:

Thank you for submitting a copy of the Environmental Assessment Worksheet (EAW) for the proposed The Royal Golf Club Residential Development. The proposed project is located within the Valley Branch Watershed District (VBWD). I offer the following comments on behalf of the VBWD. The numbers correspond to the numbers in the EAW.

9. Land Use

Descriptions

a.ii Plans (Page 6): While the site does not lie within a Minnesota Department of Natural Resources planned conservation corridor, the site is within an existing, somewhat connected, natural greenway corridor, as shown on Figure 20 of VBWD's March 2013 *Results of Minnesota Routine Assessment Method (MNRAM) for Evaluating Wetland Function* (attached).

a.iii Zoning, Floodplains (Pages 9–11): The VBWD recently completed more detailed modeling of the Downs Lake watershed that used current climate and topographic data. The modeling results and statistical analysis found the 1%-annual-chance (100-year) flood level of Downs Lake to be Elevation 893.8. The VBWD will regulate to this flood level instead of the FEMA base flood elevation of 893.0.

VBWD Rule 5, Standard 3, limits fill in lakes, ponds, and storage sites so that the cumulative effect of all possible filling will not raise the 100-year flood level more than 0.1 foot. Flood-storage replacement is allowed to conform to this VBWD rule, but wetlands should not be filled or drained to provide the flood-storage replacement.

Structures will need to have their minimum floor elevations at least 2 feet higher than the adjacent water bodies' VBWD-adopted 100-year flood level, as required in VBWD Rule 5, Standard 2.

Easements covering all portions of the property that lie below the 100-year flood elevation of lakes, wetlands, ponds, lowlands, and streams will need to be dedicated to the VBWD, as required in VBWD Rule 5, Standard 3.

VALLEY BRANCH WATERSHED DISTRICT • P.O. BOX 838 • LAKE ELMO, MINNESOTA 55042-0538
www.vbwd.org

Based on Figure 7 of the EAW, it's unclear if the proposed fill below the Down's Lake 100-year flood level is being mitigated accurately and if the proposed homes will have minimum floor elevations that are in compliance to VBWD rules.

Compatibility

9.b and 9.c. As noted in the EAW, the site is currently zoned for public and quasi-public open space, rather than residential use. Much of the adjacent land is either open parkland or used for residential housing with lots of at least 1 acre. The proposal is to create lots 0.4 to 0.75 acres. The EAW states that the project is designed to preserve considerable forested buffers adjacent to roadways. This will help hide the more densely developed lots from the existing, adjacent land, but the conversion of forest to impervious surface will significantly change the character of the area and decrease the natural habitat of the existing wildlife corridor. Additional mitigation measures should be identified, evaluated, and implemented, including but not limited to increasing the width of the corridor between Lake Elmo and the golf courses and configuring the lots to preserve trees and other natural features.

11. Water Resources

Description

a.i Surface Water (pages 13-15)

This section of the EAW does not mention the VBWD's Project 1007 system that runs through the site. Project 1007 directs outflows from the northern two-thirds of the VBWD south and east to a storm sewer pipe along Interstate 94, which ultimately discharges to the impaired Wild and Scenic St. Croix River. Approximately 20 square miles drains through this site. Maintaining this conveyance through the site is critical. Project 1007 is mentioned in the Stormwater section of the EAW on page 18.

Effects

b.3.ii Stormwater (pages 17-20)

Without seeing details, no determination can be made on the adequacy of the size and location of stormwater management facilities (ponds and infiltration areas) shown on Figure 7. Based on the concepts shown on the figure, additional infiltration areas will be needed to treat runoff from all impervious surfaces. For example, no stormwater management facility is shown near Rose Lake, and it's unlikely that the entire site will be graded or equipped with storm sewer pipes to convey the runoff to the proposed tiny infiltration area shown near the Lake Elmo outlet channel. However, as noted in the EAW, a VBWD permit will be required and the project will be reviewed for conformance to the VBWD rules and regulations when a permit application is submitted.

The VBWD will need to have unlimited access to all stormwater management facilities. The facilities depicted at the northeast corner of the site are shown on the golf course rather than in the residential subdivision. This could be problematic.

The project shows several cul-de-sacs. The VBWD encourages the developer to work with the City of Lake Elmo to limit the amount of impervious surface for streets and cul-de-sacs. Please see the attached factsheets. Reducing the amount of impervious surface will reduce the construction cost to the developer, reduce the maintenance cost to the City, and reduce the size of stormwater management facilities to construct and maintain.

b.3.iv.a Wetlands (page 21)

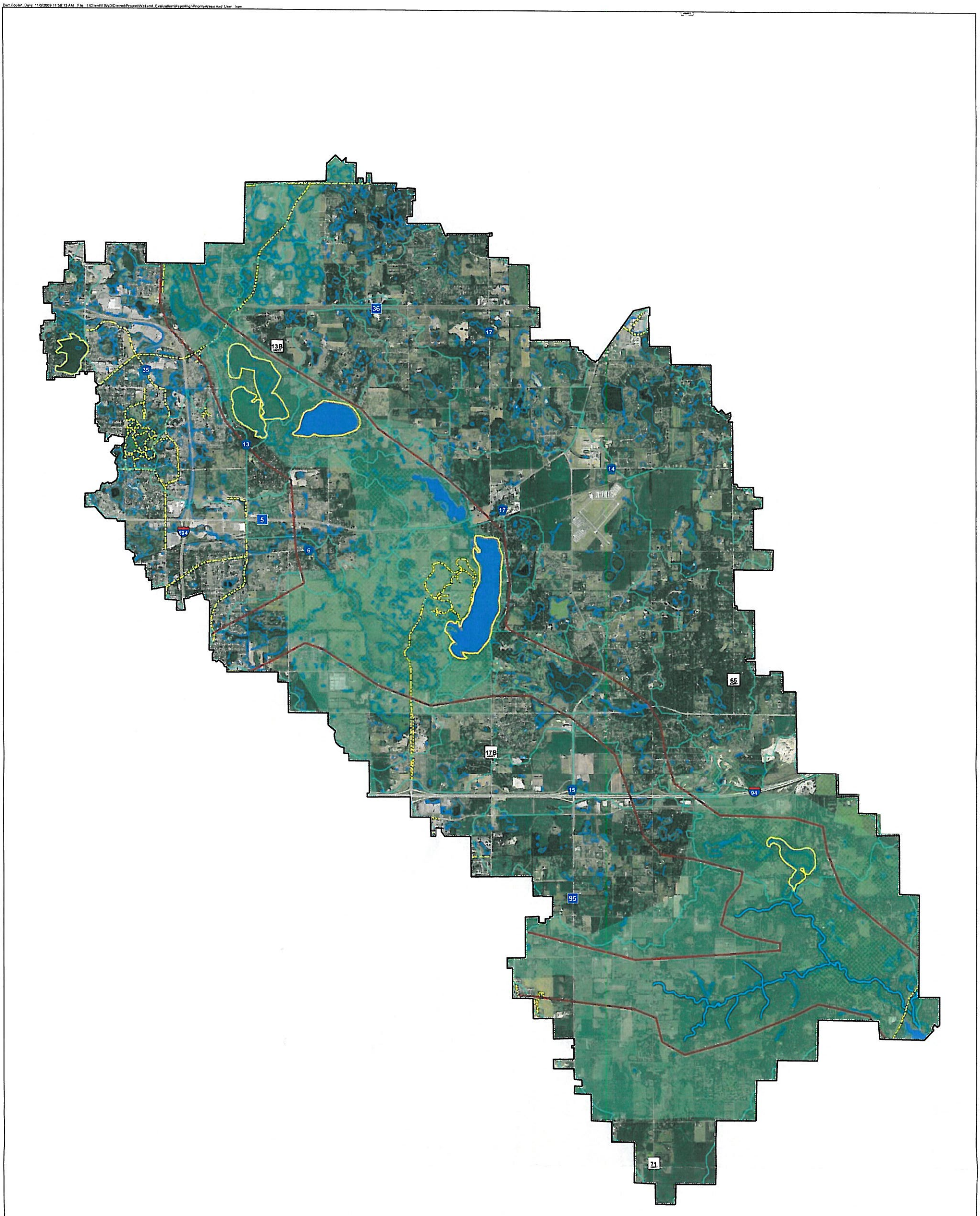
As noted in the EAW, a VBWD permit will be required and the project will be reviewed for conformance to the VBWD rules and regulations when a permit application is submitted.

Thank you for the opportunity to comment on the EAW. As the EAW indicates, a VBWD permit will be required for the project. VBWD will review the project plans for conformance to the VBWD rules and regulations when a permit application is submitted. The items identified in this letter are meant to identify potential issues and assist the project designers in protecting the water resources of the area. If you have any questions or need clarifications, feel free to contact me at 952-832-2622.

Sincerely,

John P. Hanson, P.E.
Barr Engineering Co.
Engineers for the Valley Branch Watershed District

c: VBWD Managers



Parks and Open Space
Subwatersheds
Impaired Stream (2010)
High Priority Water Body
Impaired Lakes (2010)
Somewhat Connected Natural Corridor
Central Region Green Infrastructure
Bikeways/Trails
Designated Trout Streams
Assessed Wetlands
Impaired Wetlands (2010)
Valley Branch Watershed District Legal Boundary

N

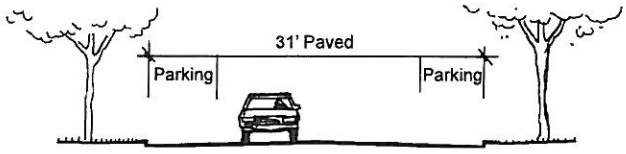
0 3,000 6,000 9,000 12,000 15,000 Feet

0 1,000 2,000 3,000 4,000 5,000 Meters

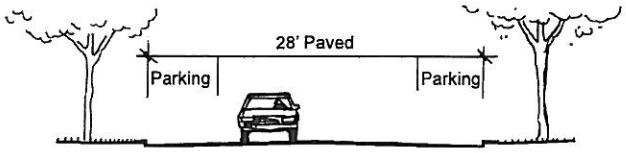
Figure 20

HIGH PRIORITY AREAS
AND GREENWAY CONNECTIVITY
Valley Branch Watershed District, MN

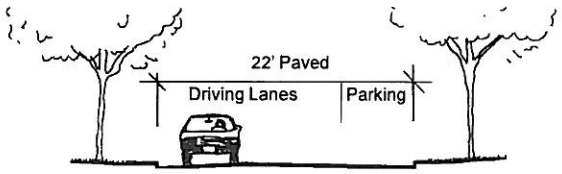
Street Design



Standard width for residential collector streets, with parking on both sides. Dimension Source: Maple Grove, Minnesota.



Standard width for residential minor streets, with parking on both sides. Dimension Source: Eden Prairie, Minn.

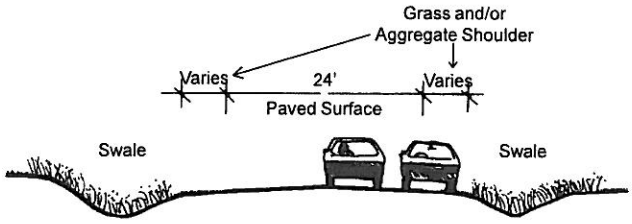


Allowing parking on only one side can further reduce the width of low-volume residential streets. Dimension Source: Robert Engstrom Companies (Fields of St. Croix, Lake Elmo, Minn.).

Many residential streets are wider than necessary. They should be designed with the minimum pavement width that will support the area's traffic volume; on-street parking needs; and emergency, maintenance, and service vehicles. For example, consider creating one parking lane rather than two for suburban residential streets.

In new subdivisions, reduce impervious surface by reducing the total length of residential streets. (See *Open Space Subdivision Design.)*

Encourage stormwater infiltration through the use of curbless road designs and overland drainage conveyance systems. On low-traffic streets, narrow the pavement and allow grass shoulders to function as an occasional parking lane.



Crowned, curbless road drains to roadside swales. Grass shoulders function as occasional parking lanes. Dimension Source: Afton, Minn.

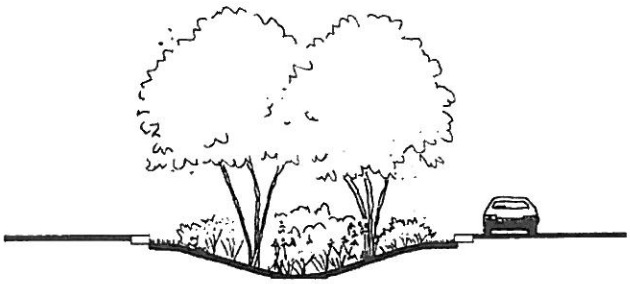
Benefits

- Reducing impervious surface results in less stormwater runoff and less infrastructure to accommodate it.
- Less pavement means lower costs for development and maintenance.
- Narrower streets discourage fast driving speeds and create a more pedestrian-friendly environment.

Design Guidelines

- Design residential streets with the minimum pavement width necessary to support: the traffic volume; on-street parking needs; and emergency, maintenance, and service vehicles.

Cul-de-Sac Design

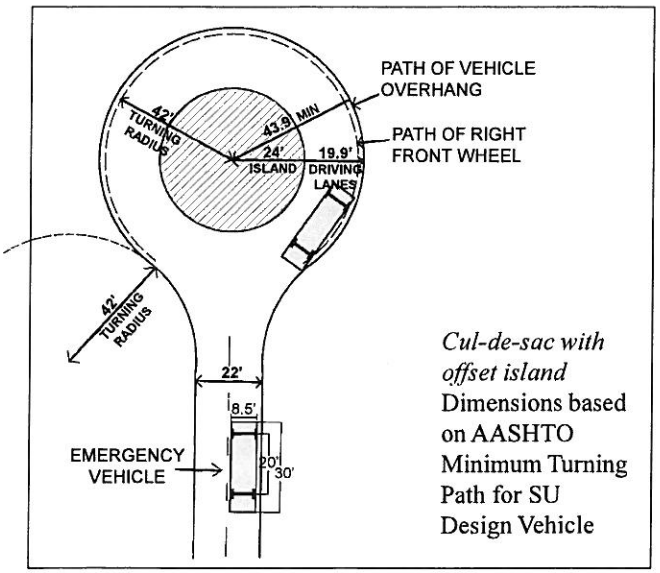


Cul-de-sac infiltration island accepts stormwater from surrounding pavement.

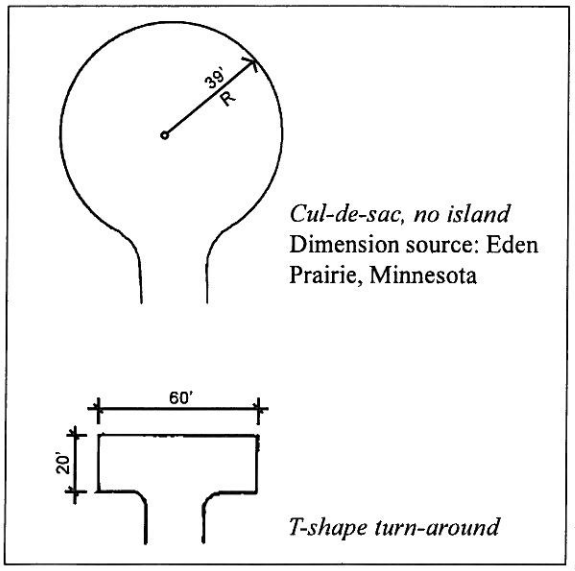
Reducing the size or changing the shape of cul-de-sacs can reduce the amount of impervious surface in subdivisions. Cul-de-sacs should be designed using the minimum radius that accomodates turning of emergency, service, and maintenance vehicles. Changing the radius from 40 feet to 30 feet can reduce the impervious coverage by about 50% (Schueler 1995).

Using turnaround options such as a T-shape can also greatly reduce impervious surface.

A landscaped island in the center of the cul-de-sac removes impervious surface where driving does not occur. This island can also be designed as a depression to accept stormwater runoff from the surrounding pavement. A flat apron curb will stabilize roadway pavement and allow for runoff to flow from pavement into the cul-de-sac's open center.



Cul-de-sac with offset island
Dimensions based on AASHTO Minimum Turning Path for SU Design Vehicle



Cul-de-sac, no island
Dimension source: Eden Prairie, Minnesota

T-shape turn-around

Drawings adapted from Schueler 1995.

Benefits

- With less impervious surface, less stormwater runoff will require management. Reducing stormwater runoff protects downstream water bodies. Less paved surface also means lower development and maintenance costs.
- Reducing pavement lessens the urban heat island effect, the increase in air temperature that can occur when highly developed areas are exposed to the sun.
- Planted cul-de-sac islands are more attractive than wide expanses of pavement.

Design Guidelines

- Design cul-de-sacs with a radius of 39 feet or less.
- Include an unpaved, depressed island with a minimum radius of 20 feet.

Washington County

Public Works Department

Donald J. Theisen, P.E.
Director

Wayne H. Sandberg, P.E.
Deputy Director/County Engineer

November 23, 2016

Stephen Wensman
Community Development Director
City of Lake Elmo
3600 Laverne Avenue North
Lake Elmo, Mn 55042

Re: Washington County Comments on Environmental Assessment Worksheet (EAW) for the Royal Golf Club Residential Development Project in the City of Lake Elmo

Dear Mr. Wensman

Thank you for the opportunity for Washington County to submit comments on the City of Lake Elmo's Environmental Assessment Worksheet (EAW) for Royal Golf Club Residential Development (Project) in Section 25, City of Lake Elmo, dated October 17, 2016. The Project is located north of at County State Aid Highway (CSAH) 10 /10th Street, south of 20th Street North, west of Manning Trail North and east of CSAH 17/Lake Elmo Avenue. The project will convert approximately 147.9 acres of golf course, woodland, ball fields, grassland, and wetland to 292 single-family residential lots. The project will involve grading, installation of public and private infrastructure, open space preservation, tree clearing, and stormwater ponding. The project will include approximately 90.8 acres of private open space consisting of woodland, stormwater ponds, wetlands, grassland, and turf areas.

Washington County supports the City of Lake Elmo efforts to allow for the expansion of urban services (MUSA) for the development of a variety of single family residential uses as well the existing club house/banquet facility on the site.

The county has prepared the following comments in the context of the the Washington County Comprehensive Plan 2030 and the Public Works Department transportation responsibilities to ensure the health, safety and welfare of county residents, ensure environmental compliance, and minimize environmental impacts.

Section 8. Permits and Approvals Required

Any work in the county right-of way as it relates to the development including grading for the installation of culverts, installation of water and sewer services, turn lane modifications, road improvements, trails, Americans with Disability Act (ADA) ramp improvements will require a right-of-way permit.

The county agrees that an access permit will be required for direct access to the site from CSAH 10/10th Street and CSAH 17/Lake Elmo Avenue at the proposed locations since the project will be an intensification of land uses on the site. The developer has submitted turn-lane modification plans for the intersections at CSAH 10/10th Street and CSAH 17/Lake Elmo Avenue and county traffic staff will review and approve them as part of the access and right-of-way permit process.

The County reserves the right to require additional improvements, as needed, as a condition of these permits.

Section 9. Land Use

Intensifying land uses within the Municipal Urban Service Areas (MUSA) is appropriate to complement the existing golf course and club house use. The project site is located one mile north of Interstate (I)-94 so regional access will provide an efficient connection to jobs and services in Washington County and the Metropolitan Region. Access to the interstate system is provided at the Manning & I-94, and County 19 & I-94 Interchanges. The result will be increased traffic at both of these interchanges, which may result in the need for improvements/upgrades to the interchange infrastructure. Most of these expected upgrades will include a city cost share. It should be noted that the County has no plans for an interchange at County 17 & I-94.

The development implements the land use goals of the Washington County Comprehensive Plan 2030, to design the land use plan to support economic development by the following policies:

- *Locate commercial and industrial growth where urban services are available; continue to prohibit commercial and industrial land use in unsewered areas.*

- *Support land use patterns that efficiently connect housing, jobs, transportation, transit, and retail and commercial centers.*

The development also implements the transportation goals of the Washington County Comprehensive Plan 2030, to develop and maintain a roadway system that accommodates the safe and efficient movement of people and goods. Strategies in the plan include the following:

- *Increased Jobs and Housing Concentrations:*
    - *Plan for, design, and construct roadways to accommodate existing and future traffic growth.*
    - *Use effective transportation planning to accommodate existing and planned land uses, while preserving natural, cultural, and historic resources.*
    - *Develop a collaborative process with local municipalities to identify fiscally responsible system improvements that are consistent with county priorities and meet the needs of municipalities.*
    - *Coordinate with other agencies to promote a well balanced transportation system.*
    - *Coordinate with communities and provide feedback on development and redevelopment proposals.*

Section 11. Water Resources

The county has not received nor reviewed a stormwater plan to date. The developer, city or watershed district must submit the drainage report and calculations for review of any downstream impacts to the county drainage system. Along with the drainage calculations, written conclusions explaining that the volume and rate of stormwater run-off into any county right-of way will not increase as part of the project, must be provided.

Section 17. Noise

Washington County's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from adjacent highways could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation. Minnesota Rule 7030.0030 states that municipalities are responsible for taking all reasonable measures to prevent land use activities listed in the MPCA's Noise Area Classification (NAC) where the establishment of the land use would result in violations of established noise standards. Minnesota Statute 116.07, Subpart 2a exempts County Roads and County State Aid Highways from noise thresholds.

County policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures in such areas. The developer should assess the noise situation and take any action outside of County right of way deemed necessary to minimize the impact of any highway noise.

Section 18. Transportation

The County agrees with the purpose of the Traffic Impact Study (TIS) dated October 12, 2016 to determine if improvements are needed to nearby intersections that may be impacted by traffic from the built out development.

The objectives of the study included the following:

- Document how the study intersections currently operate.
- Forecast the amount of traffic expected to be generated by the proposed development.
- Determine how the study intersections will operate in the year 2030 with no development traffic.
- Determine how the study intersections will operate in the year 2030 with development traffic.
- Determine how the surrounding roadways will operate in the year 2030 with the proposed Development
- Recommend improvements, if needed.

There was also agreement with the study intersections surrounding the site which included the following:

1. Lake Elmo Avenue N/20th Street N.
2. 20th Street N/20th Street Court N.
3. 20th Street N/East Golf Course Access
4. 20th Street N/Manning Trail N.
5. Lake Elmo Avenue N/Park Access.
6. Manning Trail N/Manning Avenue N.
7. 20th Street N/Proposed Western Access
8. Manning Trail N/Proposed Access
9. CSAH 10/Proposed Access

The county appreciates that the northern intersection of Manning Avenue N/Manning Trail N were analyzed and determined that a traffic signal would not be warranted at this location in the 2030 scenerio. This was based on the future improvements to the Manning Avenue corridor which includes a four-lane divided highway with traffic control improvements north and south of this intersection.

Also analyzed was the CSAH 10/Lake Elmo Avenue intersection which currently operates as an all way stop intersection with combined thru/lefts and exclusive right turn lanes at all approaches. We accept the conclusion that this development will not require or drive the need for additional traffic control or infrastructure improvements at this intersection. It should be noted that there are no improvements programmed in the County's 5 Year CIP for this intersection.

There should be further conversations with the county on the current status of the identified Regional Trail Corridor (Washington County Comprehensive Plan 2030) along CSAH 17/Lake Elmo Avenue. The County will be starting planning efforts, which include community outreach and engagement, for this segment of the Central Greenway Trail Master Plan. It is expected this process will begin in 2017. Additionally, this corridor will be evaluated as part of the Washington County Comprehensive Plan 2040 planning process.

It is noted that in the traffic analysis provided to the county, the future club house/banquet facility and the commercial public use golf course traffic was not included. As a result, the traffic study underestimates the total traffic impacts of this development. While it is true that the existing traffic volumes account for a portion of this, we understand the goal of the developer is to increase use, and thus traffic impacts, of the club house / banquet site. Please clarify how you will incorporate this expected increase in use into the traffic study.

If the comments in this letter are addressed in the EAW, the county does not feel the need for the preparation of an Environmental Impact Statement for the planned project; however, future studies, environmental documentation, and mitigation measures will need to be addressed as development occurs in the area.

If you have any questions or comments to the responses on the Royal Golf Club EAW, please contact me at Ann.pung-terwedo@co.washington.mn.us.

Sincerely,

Ann Pung-Terwedo
Senior Planner

c: Wayne Sandberg, County Engineer
Jan Lucke, Transit and Planning Manager

2301 Legion Avenue
Lake Elmo MN 55042
November 21, 2016

City of Lake Elmo
Planning and Zoning Department
Stephen Wensman, Planning Director
3800 Laverne Avenue North
Lake Elmo, Minnesota 55042

Dear Mr. Wensman,

I would like to comment, ask questions, and clarify the EAW for the proposed Royal Golf Residential Development proposed by HC Golf Development, LLC in the city of Lake Elmo, Washington County. I will be referring to pages in the EAW that have given me concern.

My first concern is that the commercial aspect of the development, the golf course, club house, storage area, sport complex, and driving range were not part of the study. These commercial aspects of the development will add to the traffic, congestion, water runoff, and have a strong environmental impact on the area.

On page 3 it states "Traffic generated by the project will have little to no impact on the regional transportation system. Intersections surrounding the site will continue to operate at acceptable levels of service with the traffic generated by the proposed project." This is followed up later on page 35 by a traffic study that was completed in July, 2016, when the golf course, driving range, club house, sport complex, and storage building were closed and the streets to the east and west, Lake Elmo Avenue and Manning Avenue, were under construction and school was not in session. I disagree with the Traffic Impact Study conclusion that the proposed project will have minimal effects on adjacent public roads and that nearby intersections will continue to operate at an overall Level of Service (LOS) A. A proper study needs to be completed.

The study continues on page 35 to say "These residential development is expected to generate a total of 2,780 average daily trips, including 1,390 vehicles entering the site and 1,390 vehicles exiting the site. It continues with "The complete development analyzed included an 18-hole golf course with 293 single family home land parcels. Based on this layout, the resulting new traffic associated with the proposed development is expected to be 1,717 vehicles entering and 1,717 vehicles exiting the development per day (total daily trip generation of 3,434 vehicles)." There is a difference in traffic if the commercial aspects are included in the study and they should be as they will be part of the traffic.

Also in the traffic discussion it appears they are unsure what roads the traffic will use and which traffic to count. It would also be good to determine if the entire area will be developed at this time as this will impact the traffic count. "There is another potential access onto Manning Trail N for the proposed residential component. This future access will depend upon development of the adjacent property and is not included in this traffic analysis. It should be noted that the proposed site driveways do not provide access to the entire development as each access only services a portion of the overall site. This results in

traffic that does not mix within the site, and depending on where the driver's origin and destination, will determine which access to use.

Page 8 states "The City's ordinance also requires that shoreland PUDs be connected to public water and sewer systems, and that least 50% of the shoreland area be maintained as open space." This is true, however only that land within 1000 feet of a shoreland is zoned this way and needs to be connected to public sewer, the remainder of the land could use septic systems. In fact, depending on the placement of the lots no home would need to use public sewer.

Page 10 states "The project is proposing to place about 14.0 acre-feet of fill in the flood fringe of Downs Lake to elevate an area for construction of 15 residential lots and adjoining streets. Construction of a municipal street around the east side of Lake Rose will require about 1.6 acre-feet of fill in the flood fringe of Lake Rose." We want to make sure proper authorities are committed to supervising this activity as streets and 15 homes could be flooded if not completed correctly. This area has been flooded in the past. It is unfortunate the developer is not listening to the land and building outside of a floodplain.

Page 11 states "The proposed project is compatible with the proposed land use, zoning, and surrounding land uses. The project is designed to preserve considerable forested buffers adjacent to surrounding roadways. These vegetated buffers will enhance the compatibility of the project with nearby land uses and help preserve the forested character of the area." It is true this may be compatible with land use, but certainly not with density of the surrounding homes. The current surrounding lots are about one acre and go up to almost 50 acres per household, the proposed lots start at 0.4 acre and go up to .75 acre per household. The conversion of forest to impervious surface will significantly change the character of the area and decrease the natural habitat of the existing wildlife corridor. Also on page 32 it states: "buckthorn may be left in the understory along exterior roadways to provide visual screening." I don't believe an invasive species is considered a "forested buffer" and will not enhance the project.

Page 13 describes the "Grading operations for residential development construction are expected to affect 137.5 acres and involve movement of about 750,000 to 1 million cubic yards of soil to construct streets, residential building pads, and stormwater ponds. Grading is expected to avoid disturbance on 84.4 acres within the project area". It is unfortunate so much land has to be disturbed, however it means there will be considerable noise. Page 34 directs our attention to "Noise generated by construction equipment and residential building construction will be limited primarily to daylight hours when noise levels are commonly higher than at night." If this is true, what provision is being made so the surrounding landowners are allowed their rightful peace and quiet? I would like to suggest all noise generating equipment may only be operated from 8 AM to 5 PM and only Monday to Friday.

Page 16 states "The project is expected to produce normal domestic wastewater. This wastewater is expected to be typical of residential developments. The project will not include industrial wastewater production or onsite wastewater treatment." It is unfortunate the club house and other commercial aspects are not included as there will be wastewater from them. No estimates were given as to the amounts.

Page 18 states "The net increase in impervious surface is estimated at 38.6 acres. The creation of stormwater features and the preservation of wetland buffers and other open spaces is expected to mitigate potential adverse effects from the increase in impervious surface." Again I ask for scrutiny of any permits and close supervision and of the mitigation as they are increasing the impervious area. Also,

can we be assured there will be supervision of these projects over time to make sure they are in proper working order? Will unlimited access be given to the proper authorities to all stormwater management facilities? This area has had major flooding in the past and with the addition of so much impervious surface it will need timely reviews.

Page 30 tells us "The project area includes potential Blanding's turtle's (Emydoidea blandingii), habitat consisting of wetlands and sandy soils. The best Blanding's turtle habitat includes wetland complexes larger than 10 acres that are surrounded by open sandy uplands." The concern continues on Page 32 with "The project may have effects on Blanding's turtles that may occur in the area. To minimize potential adverse effects on turtles and their mobility, the project will avoid most wetlands, implement stringent sediment and erosion controls, consider the use of surmountable curbs on roadways, and consider erosion control materials constructed of organic fibers rather than plastic." I don't believe these developers wish to eliminate a state-listed threatened species, and therefore should abide by the necessary measures to assure their survival. It is one thing to "try" and another to actually do them. They also need to avoid disturbance in type 2 and 3 wetlands, no dewatering of wetlands in the winter, and use wildlife friendly erosion control methods. Also, roads should be kept to minimum standards on widths and lanes (this reduces road kills by slowing traffic and reducing the distance turtles need to cross). Who will be overseeing these measures and what agency will follow through to make sure they are done?

On Page 32 I was happy to see, "To the extent practicable, tree clearing will occur between October and April, when migratory songbirds and bats are not nesting or reproducing." This is extremely important as oak wilt is prevalent in the area and we don't wish to have trees cut at the wrong time of the year. Please check with an arborist to make sure it is safe before cutting. However, "buckthorn may be left in the understory along exterior roadways to provide visual screening" is not acceptable. Buckthorn is an invasive species and difficult to remove, but to intentionally leave it when there are alternatives available is unacceptable in Minnesota. A certified landscape architect should oversee this aspect of the project.

Page 33 states, "Although the proposed project may affect some views from nearby homes, the project proponent has included design elements in the project to minimize visual effects on nearby homeowners." There are residents on all four sides of the development and all wish to have as little sight of the development as possible. Buckthorn is not an acceptable buffer.

"The project will not involve installation of intense lights that would cause glare, nor will it include industries that would emit vapor plumes." The developer needs to follow the lighting codes of Lake Elmo.

Page 34 states, "The project is not expected to generate dust or odors at levels considered unusual for suburban development construction practices." The surrounding area does not have dense development, the area is not your "usual suburban development". "Dust, odors, and noise levels are expected to be slightly higher during project construction than project operations". Hours of operation are important especially if they will be going on for 5-7 years. The health and emotional wellbeing of the surrounding homeowners should be considered and is important. I again suggest all noise generating equipment may only be operated from 8 AM to 5 PM and only Monday to Friday.

Thank you for the opportunity to comment on the EAW.

Sincerely,

Ann M. Bucheck

November 23, 2016

City of Lake Elmo
Planning and Zoning Department
Stephen Wensman, Planning Director
3800 Laverne Avenue North
Lake Elmo, Minnesota 55042

Dear Mr. Wensman:

On behalf of The Homestead Homeowner's Association, I would like to submit the following comments related to the EAW for the proposed Royal Golf Residential Development project:

1) The list of Permits and Approvals Required on Page 5 indicates that a Comprehensive Plan Amendment has been submitted to the Metropolitan Council. We believe this is inaccurate since the City Council has not voted to amend its current Comprehensive Plan to allow any kind of residential development on this property.

2) The Traffic Impact Analysis was based on data collected in July, 2016. We are concerned that this data may significantly under-represent the normal "baseline" traffic volume for the following reasons:
   - A significant portion of Lake Elmo Avenue N was closed during this time due to construction on Lake Elmo Ave and in the Old Village area.
   - Local schools were not in session due to the Summer break.
   - The Tartan Park golf course was not operational during this time. The developer has indicated that they expect 30,000 – 45,000 rounds of golf annually which will generate additional traffic volume that may not have been fully reflected in the analysis.

3) We've heard recently that the City Council might opt to schedule a vote on a proposed Comprehensive Plan amendment for this land at the upcoming December 6th Council meeting. We feel that a vote on December 6th would not allow enough time for a thorough review and consideration of the public comments related to this EAW. Our understanding is that It is common practice by RGU's to not take any legislative action on their comprehensive plan amendments for the area under consideration prior to the completion and public review of an EAW or EIS and official action on the pending EAW or EIS.

4) We would like to raise the question of whether an EIS might be required or simply be prudent for this development. As you undoubtedly know, MN Rule 4410.4400 Subp.14 defines a set of residential housing unit thresholds which trigger the need for a mandatory EIS based on "the total number of units that the proposer may ultimately develop on all contiguous land owned by the proposer or for which the proposer has an option to purchase." Unless the developer is willing to put the golf course acreage into a conservation easement in perpetuity, the total

number of housing units which could eventually be built on this entire 477-acre parcel may very well eventually exceed the thresholds defined in this rule. Our understanding is that a development with the potential for "400 unattached units or 600 attached units ... if the project is not consistent with the adopted comprehensive plan" would require a mandatory EIS.

Although our neighborhood continues to be amenable to this proposed development in concept, we remain disappointed with the proposed 292-unit housing density and we have concerns about the potential for several hundred additional homes should the golf course someday become financially unsustainable. Given the unique location and exceptional attributes of this property, coupled with the widely held local desire to preserve and protect the rural character of Lake Elmo, we feel that 'Open Space" housing densities similar to those in our neighborhood would be far preferable and more appropriate for this development.

Thank you for your continued leadership in managing this important process on behalf of our City.

Kindly

Dan Rice, President
Homestead Homeowners Association
11364 14th St N
Lake Elmo, MN 55042

From:	Corbett, Michael J (DOT)
To:	Stephen Wensman
Cc:	Scheffing, Karen (DOT); Sherman, Tod (DOT); Moynihan, Debra (DOT)
Subject:	The Royal Golf Club Residential Development EAW
Date:	Monday, November 07, 2016 2:05:01 PM

Hello Mr. Wensman,

Thank you for the opportunity to review the Environmental Assessment Worksheet (EAW) for The Royal Golf Club Residential Development EAW, located in Lake Elmo, MN. The Minnesota Department of Transportation (MnDOT) has reviewed the EAW and has no concerns.

If you have any questions, please let me know.

Michael Corbett, PE
MnDOT Metro Division – Planning
1500 W County Road B-2
Roseville, MN 55113
651-234-7793
Michael.J.Corbett@state.mn.us

WASHINGTON CONSERVATION DISTRICT
455 HAYWARD AVE N
OAKDALE, MN 55128
651-330-8220 [PHONE]
651-330-7747 [FAX]
WWW.MNWCD.ORG

November 22, 2016

Stephen Wensman, Planning Director
City of Lake Elmo
3800 Laverne Ave N.
Lake Elmo, MN 55042

RE: The Royal Golf Club Residential Development EAW

Dear Steven,

The Washington Conservation District (WCD) has received and reviewed the above-mentioned EAW. The WCD review focuses on wetlands, erosion and sediment control, natural area management, and stormwater management. Based on this review the WCD offers the following comments:

Section 7 – Cover Types
Use of native vegetation and habitat restoration is encouraged in the open space areas, including native vegetated buffers around stormwater treatment systems. Enhancing the greenway cooridor that connects Lake Elmo to natural areas to the east is encouraged.

Section 10 – Geology, Soils and Topography / Land Forms
Section b. Soils and Topography

- Compliance with NPDES, watershed, and local requirements will minimize adverse impacts of soil erosion and sedimentation. The WCD can provide support to the City to ensure compliance as needed. The WCD recommends phasing the earthwork and grading to the greatest extent possible to limit the scale and duration of exposed soils during construction.
- Preserve HSG B soils to the extent possible. Protecting zones of optimum infiltration from compaction is preferred
- Minimize soil compaction and provide soil restoration in landscaped areas to enhance infiltration
- Deep-rip the soils with a toothed bucket in low or compacted areas to promote infiltration after major construction is complete

Section 11 – Water Resources
Section iv. Surface Waters

- The EAW indicates the site will meet City and VBWD infiltration guidelines, which recommend retaining the 1.1" rain event on-site. WCD encourages the use of bioretention to meet the onsite volume retention standards. Bioretention promotes both infiltration and evapotranspiration which more effectively mimics terrestrial hydrology than pure infiltration systems. These systems are designed to be distributed throughout the site and treat small contributing drainage areas, breaking up larger catchments into smaller, more manageable parts. Minimizing the drainage area provides multiple benefits to stormwater treatment, including the potential for reduced infrastructure conveyance costs.

To ensure the long-term effectiveness of volume control, the following design specifications are presented for consideration:

- Do not rely on long-term infiltration from unlined stormwater ponds or wet detention basins
- Install bioretention/infiltration practices off-line
- Include flow-splitter and high-flow bypass
- Provide pre-treatment (especially for sediment to prolong the life of a practice)
- Keep the max water depth to acceptable levels based on soil types and actual infiltration rates
- Refer to the Minnesota Stormwater Manual, 2013 (on MN PCA website) for additional design and implementation considerations

The WCD is also serving on the WCA TEP and will provide comments on the wetland permiting through that process.

Section 13 – Fish, Wildlife, Plant Communities and Sensitive Ecological Resources (Rare Features)
Section d.

- Buckthorn removal from entire project area rather than leaving visual barrier along exterior roadways will minimize spread of this restricted noxious weed. Replace visual barrier of removed Buckthorn by replanting native trees and shrubs.

Conclusions
There are no known impacts that have not already been addressed in this EAW that warrant an Environmental Impact Statement. The Washington Conservation District appreciates the opportunity to review this EAW. Please call me at 651-330-8220, extension 20, if you have any questions about our review.

Sincerely,

Jay Riggs, District Manager
Washington Conservation District

Cc: John Hanson, VBWD