#### CITY OF LINO LAKES ENVIRONMENTAL BOARD MEETING

Wednesday, October 05, 2022 6:30 p.m. Council Chambers

#### **AGENDA**

- 1. CALL TO ORDER AND ROLL CALL
- 2. PLEDGE OF ALLEGIANCE
- 3. APPROVAL OF AGENDA
- 4. APPROVAL OF MINUTES: August 31st, 2022
- 5. OPEN MIKE
- 6. ACTION ITEMS
  - A. Robinson Sod Farm Environmental Assessment Work Sheet, Record of Decision, Michael Grochala
- 7. UPDATES
  - A. General Updates
  - B. Recycling Update
- 8. ADJOURN

#### CITY OF LINO LAKES ENVIRONMENTAL BOARD MEETING

DATE:	August 31, 2022
TIME STARTED:	6:32 P.M.
TIME ENDED:	07:11 P.M.
<b>MEMBERS PRESENT:</b>	John Sullivan, Jonathan Parsons, Ella McNulty,
	Cassie Cavegn, Alex Schwartz, Shawn Holmes,
	Lindsay Buchmeier,
STAFF PRESENT:	Andy Nelson, Tori Philippi, Julie Whitney

#### I. CALL TO ORDER AND ROLL CALL:

Chair Sullivan called the Lino Lakes Environmental Board meeting to order at 6:32 p.m. August 31, 2022. Chair Sullivan acknowledged the technical difficulty with the television monitors and that the Power Point presentation will not be seen.

#### II. PLEDGE OF ALLEGIANCE

#### III. APPROVAL OF AGENDA

Chair Sullivan approved the agenda as presented.

#### **IV. APPROVAL OF MINUTES:**

Mr. Schwartz made a MOTION to approve the July 27, 2022 meeting minutes. Motion was supported by Ms. McNulty. Motion carried 7 - 0.

#### V. OPEN MIKE

Chair Sullivan declared Open Mike at 6:34 p.m.

There was no one present for Open Mike.

Open Mike was closed at 6:34 p.m.

#### VI. ACTION ITEMS

#### A. 601 Apollo Drive Retail Site Plan Review

Mr. Nelson, Environmental Coordinator, presented the staff report.

Land use application was received on a site plan review for a commercial development that will be located at 601 Apollo Drive. This is at the NE corner of Lake Drive and Apollo Drive. The parcel is zoned as General Business and guided for commercial land use in the 2040 Comprehensive Plan. This proposed project is going to include a 4,200 square foot dental clinic, a 2,240 square foot coffee shop with a drive thru, and also a drive thru ATM. The site will have 43 parking stalls and a trash and recycling enclosure. Land cover at this site historically was oak openings and barrens. MLCCS data indicates other exposed transitional land with zero to 10 percent pervious cover, oak forest dry sub type and medium grass altered non-native dominated grass land. What's on the site today is mowed weedy vegetation and sandy soil.

Mr. Nelson stated this site ultimately drains to George Watch Lake and that is an impaired water impaired for nutrients. There were no other rare, unique, or significant resources identified on the site or in the vicinity. Soil on the site is all Zimmerman fine sand. It has low runoff potential and high infiltration rate even when wet and it is excessively drained.

Mr. Nelson reviewed existing and proposed conditions for storm water management. Most storm water currently infiltrates into the sand soil, with the run off heading east through the storm water system and ultimately to George Watch Lake. Under the proposed conditions that parcel will be divided into three drainage areas. Each one will be treated by porous pavement BMP's (best management practices) before entering the storm water system. Mr. Nelson stated the parking stalls will be porous pavement.

Mr. Schwartz asked if the porous pavement counted as pervious surface for the storm water calculations.

Mr. Nelson stated that he believed the porous pavement areas would be calculated as pervious surface and briefly explained the pervious pavement BMPs.

Chair Sullivan stated that that this was exciting and a first in the City. Mr. Nelson stated it was unique because many of the projects the Board had looked at recently were in areas where infiltration of storm water wasn't an option. In this case, infiltration is an option, so the pervious pavement BMPs might be a good choice.

Chair Sullivan mentioned concerns that grass and weeds may grow up through the pervious pavement.

Mr. Nelson went on to cover the storm water pollution prevention plan. Due to the drainage to George Watch Lake, stabilization must occur within 7 days after construction activity ceases.

Ms. Buchmeier asked for confirmation that the erosion control and the stabilization timeline were the only requirements related to drainage to the impaired water.

Mr. Nelson confirmed that was correct.

Mr. Nelson went on to say the site does not fall into a drinking water supply management area and is not in a flood management zone. It's not in the AUAR environmental review boundary. It's not in shore land district, there are no wetlands indicated on the site, and this site is not in the Greenway system.

Mr. Nelson stated for trails there are already sidewalks constructed on the south and east perimeters of the site. On the 2040 comprehensive plan there is a proposed pedestrian trail on the west perimeter and a proposed bike lane on Lake Drive. Both of these things may be included with future reconstruction of Lake Drive and will not be installed at this time. There is a 15 foot easement already in place to accommodate these future improvements.

Mr. Nelson then covered the landscaping of the property stating there is already a master landscaping plan in place that was approved in 2001 that covers the entire marketplace retail area including Target, Kohl's and the retail areas. The current landscape submittal is measured against the master landscaping plan rather than current ordinance. He then highlighted some differences between the current submittal and the master landscaping plan, noting that the current submittal was an improvement on the 2001 plan in terms of additional plants, increased diversity, and replacing ash trees with a different species.

Mr. Schwartz asked if the plantings along Lake Drive are within that 15 ft. easement. Mr. Nelson said he would need to look at the map closer.

Mr. Schwartz voiced concern that those plants would have to be removed to implement the future bike trail. Mr. Nelson said that this concern could be added to the Board comments.

Chair Sullivan asked how current ordinance requirements differ from the requirements that the 2001 master landscaping plan was held to.

Mr. Nelson responded that the current ordinance is more stringent than what was in place for the 2001 master plan submittal, but noted that the current plan included calculations related to current ordinance, and that it would probably meet current ordinance as well as adhering to the 2001 plan.

Mr. Nelson continued the current landscaping plan and stated there will be 24 deciduous trees, 32 coniferous trees, 173 shrubs, 46 perennials and 100 ornamental grasses. Any areas not covered by landscaping will be sodded for permanent stabilization.

Chair Sullivan asked if there would be a sprinkler system and Mr. Nelson stated that there would be.

Chair Sullivan asked what kind of grass would be put in and Mr. Nelson stated sod, turf grass.

Chair Sullivan made a recommendation that the project use ground cover that requires less water such as fescue.

Mr. Nelson responded that a ground cover that required less water could be added to the Board recommendations.

Mr. Sullivan asked if we had anything other than bluegrass in the other commercial areas.

Mr. Nelson stated it is the applicant's discretion as long as they meet the requirements, noting that they meet the requirements with sod, which has been used more in the prominent sites for aesthetic reasons.

Mr. Nelson noted that the lighting plan seems to meet requirements but added that the City Planner reviews lighting.

Mr. Schwartz asked if the city provides or can provide information on drought tolerant grass for all new developments. Mr. Nelson said he would look into it.

Mr. Parsons asked if there was additional maintenance associated with the pervious pavement being used and is it part of their storm water or general cleaning requirements for the area.

Mr. Nelson stated it will be part of the storm water declaration and they would have a maintenance agreement.

Chair Sullivan asked if Mr. Nelson could get a sample of the pervious pavement. Mr. Nelson said he would check in to it.

Ms. Buchmeier then asked if the pervious pavement areas had different maintenance needs in winter, such as additional salt due to plows being less effective.

Mr. Nelson stated he did not have the answer to that but the engineering department brought up the same question and would be looking into it. He said he believed the plowing would be the same but whether the salt degrades the material over time is an important consideration.

Mr. Schwartz stated Century College on the east side of the campus used this type of pavement on their east side parking lots in around 2007 or 2008 and it would be interesting to see how it has held up.

Mr. Sullivan asked if there were any recommendations from the board in addition to the staff recommendation. Mr. Schwartz's recommends that plants be moved from the easement area so that they aren't impacted by future construction of a trail, and Chair Sullivan's request that the developer use a less water intensive type of sod.

Chair Sullivan requested a MOTION to approve. Ms. Holmes motioned to approve the site plan review along with the additional recommendations. It received a second by Mr. Schwartz. Motion carried 7-0.

#### VII. DISCUSSION ITEMS

None

#### VIII. UPDATES

#### A. General Updates

Mr. Nelson stated that there are no general updates.

#### B. <u>Recycling Updates</u>

Ms. Philippi provided an update that there was no recycle Saturday due to Blue Heron Days.

For Blue Heron Days parade clean up there were 5 volunteers. One Anoka County Recycling ambassador and four Forest Lake National Honor Society students.

After the release of the fall newsletter we gained 13 new participants for our organics program bringing the total to 464 participants.

This month's Solid Waste Abatement Advisory team meeting we took a tour of Bicycle Glass in Fridley. Bicycle Glass is a lighting company committed to quality, sustainability, and affordability. All lighting is made with 100% pre and postconsumer recycled glass that is locally sourced from the community.

Chair Sullivan asked for questions from the board and Ms. Holmes asked if the approval was received for the Marshan organic recycling enclosure.

Mr. Nelson stated we do have a grant application in with the county and we have preliminary approval and expect to have approval by September 20, 2022. We have to verify that the concrete and fence company can still fit the project in this fall.

Chair Sullivan asked if we were having any trouble with contamination at the sites. He stated in the past they did at Marshan. Ms. Philippi stated there was not.

Ms. Buchmeier asked about the smart irrigation and wanted to know how many have been sold and if sales are put on hold in the winter.

Mr. Nelson stated we have approximately 40 left and we have a grant to get another 160 to 180 controllers. We do have a timeline when we have to have them sold by. We will do one more advertising campaign before residents are no longer irrigating for the year. They will not be sold over winter because there is a requirement that they need to be installed during a certain time frame to get the cheaper price.

Ms. Buchmeier asked if there were resources from consumers that have already installed the device. Mr. Nelson stated we only have the flyer that is sent with the device. Mr. Nelson stated he has received word of mouth feedback and it was all positive. They did do an outreach table with the U of M and provided information on the program there along with the smart watering and turf grass alternatives messaging brought by Mrs. Kim Sullivan with the University of Minnesota. Chair Sullivan asked if anyone signed up that day and Mr. Nelson stated one.

#### IX. ADJOURNMENT

Chair Sullivan made a MOTION to adjourn the meeting at 7:11 p.m. Motion was supported by Ms. Holmes and second motion by Mr. Parsons Motion carried 7 - 0.

Respectfully submitted,

Julie Whitney - Community Development Administrative Assistant

#### ENVIRONMENTAL BOARD AGENDA ITEM 6A

STAFF ORIGINATOR:	Michael Grochala
MEETING DATE:	October 5, 2022
REQUEST:	Robinson Sod Farm Environmental Assessment Worksheet Record of Decision
APPLICANT:	Integrate Properties, LLC

#### **BACKGROUND:**

The Robinson Sod Farm Environmental Assessment Worksheet (EAW) was approved for distribution by the City Council on August 8, 2022. The document was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comments to the required EAW distribution list. A Notice of Availability was published in the EQB Monitor on Tuesday, August 16, 2022. Notice was also provided to properties within 600 feet of the proposed project.

The thirty day comment period closed on September 15, 2022. The City received a number of written comments from agencies and citizens. The City must respond to every substantive comment. Substantive comments are comments that address the accuracy and completeness of the materials contained in the EAW, potential impacts that may warrant further investigation before the project is commenced, and the need for an Environmental Impact Statement (EIS) on the proposed project.

The City's response to substantive comments received during the comment period are included in the attached draft Record of Decision document.

The EAW is not meant to approve or disapprove a project, but is simply a source of information to guide other approvals and permitting decisions. Minnesota Rule 4410.177, Subpart 2 requires the City to make either a negative declaration or a positive declaration on the need for an EIS. The City shall base its decision regarding the need for an EIS on the information gathered during the EAW process and the comments received on the EAW. In doing so, the City must prepare a record of decision that includes the information supporting the decision.

Minnesota Rules 4410.1700, Subp. 7 lists four criteria that shall be considered in deciding whether a project has the potential for significant environmental effects. Those criteria are:

A. Type, extent, and reversibility of environmental effects;

- B. Cumulative potential effects. The RGU shall consider the following factors: whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project;
- C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU may rely only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project; and
- D. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.

Section 5. Findings of Fact of the attached response document provides the City's findings of fact and addresses each of the above referenced criteria. Section 6. Record of Decision concludes that an EIS is not required.

Representatives from the project proposer and WSB & Associates, the City Engineer, will be present at the meeting to address any questions from the board. Staff is requesting the board review and comment on the response document. Any comments received from the board will be forwarded to the City Council for consideration.

#### RECOMMENDATION

If the City determines that information necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could be reasonably obtained, the RGU shall either:

- A. make a positive declaration and include within the scope of the EIS appropriate studies to obtain the lacking information; or
- B. postpone the decision on the need for an EIS, for not more than 30 days or such other period of time as agreed upon by the RGU and proposer, in order to obtain the lacking information. If the RGU postpones the decision, it shall provide written notice of its action, including a brief description of the lacking information, within five days to the project proposer, the EQB staff, and any person who submitted substantive comments on the EAW.

Staff is of the opinion that no additional information is required and that any potential impacts and mitigation will be addressed through the city and other public regulatory permitting processes.

Based on the information contained in the EAW, comment letters, and Findings of Fact, staff is recommending adoption of the Record of Decision and making a "Negative Declaration" on the need for an EIS.

#### ATTACHMENTS

1. Draft Record of Decision.



# Robinson Sod Farm

RESPONSE TO COMMENTS, FINDINGS OF FACT, AND RECORD OF DECISION

CITY: LINO LAKES

**Responsible Government Unit (RGU)** 

**City of Lino Lakes** 600 Town Center Parkway Lino Lakes, MN 55104 <u>linolakes.us</u>

October 2022

### Table of Contents

Table of Co	ontents	i	
Tables		iii	
Appendice	S	iii	
1. INTRO	INTRODUCTION		
2. EAW N	OTIFICATION, DISTRIBUTION, AND COMMENT PERIOD	.1	
	IENTS RECEIVED		
	NSE TO COMMENTS		
	MMENTS FROM GOVERNMENT AGENCIES		
4.1.1	Minnesota State Historic Preservation Office (SHPO) – September 9, 2022		
4.1.2	Minnesota Pollution Control Agency (MPCA) – September 13, 2022	. 3	
4.1.3	Metropolitan Council – September 13, 2022	. 5	
4.1.4	Minnesota Department of Natural Resources – September 15, 2022	. 6	
4.2 COI	MMENTS FROM THE GENERAL PUBLIC	10	
4.2.1	Nicki Roland Ecker – August 25, 2022	10	
4.2.2	Anna Jungbauer – August 25, 2022	10	
4.2.3	Morgan C – August 25, 2022	11	
4.2.4	Justin Carver – August 26, 2022	11	
4.2.5	Mike Trudeau – August 30, 2022	11	
4.2.6	Mara Lipinski – September 5, 2022	11	
4.2.7	Greg and Sarah Austin – September 10, 2022	12	
4.2.8	Carl Street Residents – September 12, 2022	13	
4.2.9	Ann Rudie – September 12, 2022	18	
4.2.10	Doug and Cindy Hansen – September 12, 2022	18	
4.2.11	Steven Anderson – September 12, 2022	19	
4.2.12	Scott Zbikowski – September 13, 2022	20	
4.2.13	Lisa and Ernst Olsen – September 14, 2022	21	
4.2.14	Kevin and Tammy Dunrud – September 14, 2022	21	

	4.2.15	Reilly Anderson – September 15, 2022	. 22
5.	FINDI	NGS OF FACT	.23
5	5.1 Pro	oject description	. 23
	5.1.1	Proposed Project	. 23
	5.1.2	Site Description and Existing Conditions	. 24
	5.1.3	Decision Regarding the Potential for Significant Environmental Effects	. 24
	A. 1	Type, Extent, and Reversibility of Environmental Effects	. 24
	В. (	Cumulative Potential Effects	. 27
	C. E	Extent to Which Environmental Effects are Subject to Mitigation	. 28
	D. E	Extent to Which Environmental Effects can be Anticipated and Controlled	. 29
6.	RECO	RD OF DECISION	.30

### Tables

Table 4 (in EAW). Required Permits and Approvals for the Proposed Project..... Error! Bookmark not defined.

### Appendices

**Appendix A.** Agency and Public Comments Submitted to the City of Lino Lakes **Appendix B.** City of Lino Lakes Resolution Finding of No Need for EIS

### 1. INTRODUCTION

The Robinson project is a proposed low, medium, and high density residential development on an existing 158-acre agricultural area in the City of Lino Lakes, Anoka County, Minnesota that is located to the southeast of Sunset Avenue and 125<sup>th</sup> Ave NE (Main Street, CSAH 14). Two site plan alternatives have been developed for the project which include the PUD Concept Plan expected to consist of 557 dwelling units and the Yield Plan that is expected to consist of 707 dwelling units. These plans include single family detached homes, townhomes, and multi-family units. The project will include new roads, stormwater features, and the installation of municipal sewer and water systems.

An Environmental Assessment Worksheet (EAW) was prepared pursuant to Minnesota Rules Part 4410.4430, Subp. 19. Residential Development. The EAW and the respective comments have been reviewed in accordance with Minnesota Rules 4410.1700 to determine if the project has potential for significant environmental effects. This document includes responses to comments received by the City of Lino Lakes, the Findings of Fact supporting the decision, and the Record of Decision indicating an Environmental Impact Statement (EIS) is not necessary for this project.

# 2. EAW NOTIFICATION, DISTRIBUTION, AND COMMENT PERIOD

In accordance with Minnesota Rules 4410.1500, the EAW was completed and distributed to persons and agencies on the office of Environmental Quality Board (EQB) distribution list. The notification was published in the EQB Monitor on August 16, 2022, initiating the 30-day public comment period. A public notice and press release was submitted to the Quad newspaper, the local newspaper. The comment period ended on September 15, 2022.

### 3. COMMENTS RECEIVED

#### **GOVERNMENT AGENCIES:**

The City received comment letters from four government agencies. These include:

- Minnesota State Historic Preservation Office (SHPO) September 9, 2022
- Minnesota Pollution Control Agency (MPCA) September 13, 2022
- Metropolitan Council September 13, 2022
- Minnesota Department of Natural Resources September 15, 2022

None of the comments recommended the preparation of an EIS.

#### PUBLIC COMMENTS:

In addition to the government agencies, the City received 15 emails from the public. These include:

- Nicki Roland Ecker August 25, 2022
- Anna Jungbauer August 25, 2022
- Morgan C August 25, 2022
- Justin Carver August 26, 2022
- Mike Trudeau August 30, 2022
- Mara Lipinski September 5, 2022
- Greg and Sarah Austin September 10, 2022
- Carl Street Residents September 12, 2022
- Ann Rudie September 12, 2022
- Doug and Cindy Hansen September 12, 2022
- Steven Anderson September 12, 2022
- Scott Zbikowski September 13, 2022
- Lisa and Ernst Olsen September 14, 2022
- Kevin and Tammy Dunrud September 14, 2022
- Reilly Anderson September 15, 2022

### 4. RESPONSE TO COMMENTS

This document responds to comments individually. It includes summaries of comments followed by responses. The complete comment letters and emails are included in **Appendix A**. Responses to comments are generally confined to substantive issues that "address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation before the project is commenced, and the need for an EIS on the proposed project." (MN Rules 4410.1600). Some of the comments included general remarks or recommendations. Such comments are noted for the record and further detail of the statements or recommendations is included in **Appendix A**.

#### 4.1 COMMENTS FROM GOVERNMENT AGENCIES

#### 4.1.1 Minnesota State Historic Preservation Office (SHPO) – September 9, 2022

**Comment:** The Minnesota SHPO concludes that there are no properties listed in the National or State Registers of Historic Places, and no known or suspected archaeological resources located in the area that will be affected by this project.

**Response:** This comment has been noted for the record. The SHPO was contacted as part of the EAW process and their response is included in Appendix E of the EAW.

#### 4.1.2 Minnesota Pollution Control Agency (MPCA) – September 13, 2022

#### Permits and Approvals (Item 8)

**Comment:** In accordance with Minnesota Statutes, the Project should include the MPCA as a regulator of all surface waters as defined by Minn. Stat. § 115.01, subd. 22 Waters of the state. Even though there may be surface waters that are determined to be US Army Corps of Engineers non-jurisdictional or exempt from the Wetland Conservation Act, all surface waters are regulated by the MPCA, and any surface water impact needs to be described in the application and may require mitigation.

The scope of a Clean Water Act Section 401 Certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. In addition, the applicant must also submit to the MPCA the Antidegradation Assessment in accordance with water quality standards Minn. R. 7050.0265 and should review the Antidegradation requirements in 7050.0285.

The 401 Water Quality Certification becomes an enforceable component of the associated federal license or permit, issued under either Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. The scope of a Clean Water Act Section 401 Certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. For further information about the 401 Water Quality Certification process, please contact Bill Wilde at 651-757-2825 or william.wilde@state.mn.us.

**Response:** As noted in the permit table of the EAW (Table 5) all necessary permits, including the Section 401 Certification, will be received prior to development of this project.

#### Water Resources (Item 11)

#### Stormwater

#### **Comment:**

- The EAW states the proposed 158-acre residential development is in a 100-year floodplain. The EAW indicates that soil remediation for the construction will be required due to predominately hydric soils on the site and stormwater ponds will be constructed in lieu of infiltrating stormwater to meet volume reduction requirements.
- The EAW should consider climate risks associated with increased rainfall regarding the
  proposed development that could result in the potential for increased flood risk. Filling of
  wetlands at the site and adding large areas of impervious surfaces is likely to alter the
  natural hydrology and increase this risk. Efforts to reduce stormwater volume and provide
  more climate resiliency should be considered. The Project proposer is strongly encouraged
  to utilize Low Impact Development strategies such as reducing impervious surfaces through
  use of narrower streets and sidewalks, stormwater reuse and green infrastructure practices

to promote retention of stormwater on the site while also providing other environmental benefits.

**Response:** Low Impact Development strategies will be used to the extent practicable. The PUD process allows for flexibility in pavement widths and requires higher levels of open space than conventional development. A stormwater reuse system for irrigation will be evaluated as part of the development review process and used where possible.

 During construction, the MPCA National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit (CSW Permit) requires preservation of the existing 50 feet of natural buffer to wetlands on the site. If the existing buffer must be encroached to complete the construction, then redundant (double) down gradient sediment controls must be utilized to protect the wetlands. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.

**Response:** The project proposer will be designing the stormwater basins and on-site floodplain mitigation in accordance with the City and Rice Creek Watershed District requirements to account for flood risk on site. The development will obtain an NPDES/SDS CSW permit and follow the wetland buffer requirements around preserved wetlands on site.

#### Contamination/Hazardous Materials/Wastes (Item 12)

**Comment:** Please be aware that farmsteads have the potential for releases or threatened releases of agricultural chemicals. The Minnesota Department of Agriculture (MDA) is the regulatory agency charged with managing the response and cleanup of fertilizers and pesticides. Information regarding the MDA is available on the website at: https://www.mda.state.mn.us/pesticide-fertilizer/spills-cleanup. For questions regarding agricultural chemicals, please contact Cathy Villas-Horns with the MDA at 651-201-6697. For questions regarding waste pesticide containers, please contact Jane Boerboom with the MDA at 651-201-6540.

**Response:** As part of the EAW process, the MDA's What's In My Neighborhood was reviewed as part of Item 12 – Contaminated/Hazardous Materials and did not indicate that there are any known and potential sources of agriculture chemical soil and ground water contamination on site. Additionally, a Phase I Environmental Assessment was completed as part of the developer's due diligence of the site.

#### **Other Potential Environmental Effects (Item 20)**

**Comment:** Please note that chloride (salt) is a growing issue for lakes, streams, and groundwater around the state. Chloride can come from both de-icing salt and water softener salt. For the proposed Project, the MPCA recommends smart salting practices for de-icing streets and driveways during the winter weather months and water softening best practices be

# used year-round. Additional resources are available at: <u>https://www.pca.state.mn.us/business-</u>with-us/statewide-chloride-resources.

**Response:** The City of Lino Lakes will use smart salting practices on the roadways throughout the development. Residents will be encouraged to implement smart salting practices on their driveways and use best salt management practices with their water softeners should they have one in their home. The project proposer can include the factsheet on Residential water softening for homeowners in the proposed development that is available on the MPCA's statewide chloride resources website located here: <u>Microsoft Word - UMNResidentialBMPs\_Final.docx</u>. The City provides education resources related to chloride use on its website and newsletter.

#### 4.1.3 Metropolitan Council – September 13, 2022

#### Item 6 – Project Description - Forecasts

**Comment:** Met Council indicates either of the two scenarios presented in the EAW could yield development beyond previous expectations and that allocation of the forecast to sub city zones can be revised as needed. Met Council indicates that should the subject development proceed, several hundreds of excess households would result. City staff can request a Transportation Analysis Zone allocation adjustment by contacting Council Research staff.

**Response:** Both of the two scenarios presented are consistent with the City's 2040 Land Use Plan and Utility Staging Plan and the projected number of households for the area. The City of Lino Lakes staff will request a Transportation Analysis Zone allocation adjustment from Met Council if this is necessary.

#### Item 6 – Project Description - Housing

**Comment:** Met Council states that any changes to guiding land use, including changes to percent residential and minimum allowable density, may create inconsistency with regional housing policy and impact the City's ability to participate in Livable Communities Act Programs.

**Response:** No change to the guiding land use is proposed. The proposed development density and land use is consistent with the City's Comprehensive Plan and consistent with the Metropolitan Council's guidance for "emerging suburban edge communities". The proposed development will provide "Lifecycle" housing choices consistent with the City's housing goals.

#### Item 9 – Land Use – Regional Parks and Trails

**Comment:** A planned unit of the Regional Park System – the Central Anoka County Regional trail – is immediately adjacent to the Project Site. Council encourages Integrate Properties, LLC and the City of Lino Lakes to coordinate with Anoka County prior to and during any future construction activities to ensure there are no permanent impacts to the planned regional trail as a result of either of the two site plan alternatives.

**Response:** The project proposer and the City of Lino Lakes will coordinate with Anoka County to ensure that the Central Anoka County Regional Trail is provided for with the development. The City anticipates construction of the trail along Main Street, from Sunset Avenue to the eastern project limits, concurrent with the proposed development.

#### Item 11i – Water Resources - Groundwater

**Comment:** The Project Site is located in the North and East Groundwater Management Area (https://www.dnr.state.mn.us/gwmp/area-ne.html) designated by the Minnesota Department of Natural Resources. Given the range of water supply challenges (quantity and quality) that exist in this part of the metro, the Council encourages the City to collaborate with state partners and/or neighboring communities when expanding or developing new water supplies in this area.

**Response:** The City will collaborate with state partners and/or neighboring communities when expanding new water supplies in the area. The City participates as a member on the North and East Groundwater Management Area task force

#### Item 11bii – Water Resources - Stormwater

**Comment:** This appears to be a difficult site for intensive development due to a predominance of hydric soils, high water table, wetlands, presence of county and private ditches, and location in the 100-year flood plain. Many of the soil associations listed for the site have severe limitations for dwellings with basements and roadways. The EAW states that the project will result in 50-60 acres of impervious surface and runoff will be treated with stormwater basins. Taken together, these conditions indicate that the site is a poor candidate for the proposed development. If the proposer is determined to pursue this project, they should work closely with the City and Rice Creek Watershed District to address all these concerns before proceeding.

**Response:** The project proposer has been working closely with the City of Lino Lakes and Rice Creek Watershed District to address the environmental concerns of the site including the high-water table, wetlands, county and private ditches, and the 100-year floodplain. The project proposer will be subject to the regulations regarding these environmental issues and will need to obtain the appropriate permit approval prior to development of the site.

#### 4.1.4 Minnesota Department of Natural Resources – September 15, 2022

#### Page 6, Permits and Approvals

**Comment:** Please include a DNR Permit to Take in the list of required permits and approvals. Protected state-listed species have been identified in the project vicinity. The need for a Permit to Take will be determined as the proposer works through the rare plant survey process. **Response:** This has been added to the required permits and approvals table found in Section 5. Findings of Fact, C. Extent to Which Environmental Effect Area Subject to Mitigation.

#### Page 12, Wastewater

**Comment.** The proposed plan to add 557 and even up to 707 residential units would presumably add a comparable number of residential water softeners due to the water hardness levels of the City of Lino Lakes municipal water supply. Many Minnesota municipalities are wrestling with high chloride levels in their wastewater (See this recent study (link in letter in Appendix A) on sources of chloride in Minnesota). Chloride is one of the components of salt, which is used in forms such as sodium chloride (table salt), calcium chloride and magnesium chloride (road salts). Sodium chloride is commonly used in home water softeners and by water treatment plants to treat "hard" water. Minnesota generally has groundwater with high levels of calcium and magnesium that must be removed through softening in order to improve taste and prevent lime scale buildup in appliances, pipes and water fixtures. The majority of home water softeners use sodium, while the chloride ions are discharged in the wastewater and eventually end up in the environment.

Each community needs to determine which tool is appropriate for their situation. This factsheet (link in letter in Appendix A) suggests ways for homeowners to optimize their water softener salt use, while this link (link in letter in Appendix A) provides resources for cities and examples of how other communities in Minnesota are addressing their high chloride levels. We suggest that as this development moves forward, the City of Lino Lakes consider what strategies can be used to minimize chloride use.

**Response:** The City of Lino Lakes recognizes the importance of reducing chloride use. The City of Lino Lakes will encourage residents to implement best management practices with their water softeners. The project proposer can include the factsheet on Residential water softening for homeowners in the proposed development that is available on the MPCA's statewide chloride resources website located here: <u>Microsoft Word -</u> <u>UMNResidentialBMPs\_Final.docx</u>. The City provides education resources related to

chloride use on its website and newsletter.

#### Page 13, Post-Construction Runoff

**Comment.** Blanding's turtles, a protected state-listed threatened species, have been documented within the Project Site. Stormwater features may be colonized by Blanding's turtles in the area, therefore we recommend incorporating measures to avoid impacting this species into stormwater management. In years when the stormwater features will be dredged to remove excess sediment, please draw down water levels by September 15th in order to allow turtles to find overwintering habitat elsewhere.

**Response:** The avoidance measures outlined in the NHIS letter that is included in Appendix C of the EAW will be forwarded to the project proposer and incorporated into construction notes to avoid any potential impacts to the Blanding's turtle.

#### Page 13, Post-Construction Runoff

**Comment.** We recommend that BWSR-approved, weed-free, native seed mixes be used to the greatest degree possible in stormwater features in order to provide pollinator habitat.

**Response:** The proposed stormwater features on site will utilize BWSR approved, weed-free, native seed mixes.

#### Page 13, Post-Construction Runoff

**Comment.** The planned increase in impervious surfaces will also increase the amount of road salt used in the Project Site. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

We also encourage cities and counties to consider how they may participate in the Statewide Chloride Management Plan and provide public outreach to reduce the overuse of chloride. Here are some educational resources for residents as well as a sample ordinance regarding chloride use (link in letter in Appendix A).

**Response:** The City of Lino Lakes will use smart salting practices on the roadways throughout the development. The City annually provides educational resources for residents on its website and in City newsletters.

#### Page 20, Rare Features

**Comment.** This section of the EAW lists the rare species identified in the DNR Natural Heritage Review, but does not include or discuss DNR requirements regarding these species. The statement that, "There are no state listed species within the project site" is incorrect. The Natural Heritage Review letter has concerns about two state-listed species that may occur within the site. The lack of known occurrences within the project boundary does not mean that these species do not use the area. Minnesota's Endangered Species Statute

(Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit.

- Swamp Blackberry (*Rubus semisetosus*), a state-listed endangered species, has been documented in the vicinity of the project. A qualified surveyor needs to conduct a botanical survey if any shrub removal is associated with the proposed project. Surveys must be conducted by a DNR approved surveyor (see attached list) and follow the standards contained in the Rare Species Survey Process and Rare Plant Guidance. Project planning should take into account that any botanical survey needs to be conducted during the appropriate time of the year, which may be limited. Please consult with the NH Review Team (Reports.NHIS@state.mn.us) regarding this process.
- Blanding's turtles (*Emydoidea blandingii*), a state-listed threatened species, have been documented in the vicinity of the proposed project. As such, **the following avoidance measures are required**:
  - Avoid wetland impacts during hibernation season, between October 15th and April 15th, unless the area is unsuitable for hibernation.
  - The use of erosion control blanket shall be limited to 'bio-netting' or 'naturalnetting' types, and specifically not products containing plastic mesh netting or other plastic components.
    - Also, be aware that hydro-mulch products may contain small synthetic (plastic) fibers to aid in their matrix strength. These loose fibers could potentially re-suspend and make their way into Public Waters. As such, please review mulch products and not allow any materials with synthetic (plastic) fiber additives in areas that drain to Public Waters.
  - Areas where there will be construction should be checked for turtles before the use of heavy equipment or any ground disturbance.
  - The Blanding's turtle flyer must be given to all contractors working in the area.
  - Monitor for turtles during construction and report any sightings to the DNR Nongame Specialist, Erica Hoaglund (<u>Erica.Hoaglund@state.mn.us</u>).
  - If turtles are in imminent danger they must be moved by hand out of harm's way, otherwise, they are to be left undisturbed.
- If the above avoidance measures are not possible, please contact Samantha Bump (Samantha.Bump@state.mn.us) as further action may be needed.
- For additional information, see the Blanding's turtle fact sheet, which describes the habitat use and life history of this species. The fact sheet also provides two lists of recommendations for avoiding and minimizing impacts to this rare turtle. Please refer to both lists of recommendations and apply those that are relevant to your project. For further assistance regarding the Blanding's turtle, please contact the DNR Regional Nongame Specialist, Erica Hoaglund.

**Response:** The NHIS letter from the DNR is included in Appendix C of the EAW and states the information stated above about the Swamp Blackberry and Blanding's turtles. The need for a botanical survey of Swamp Blackberry will be evaluated if shrub removal is necessary for the project and the avoidance measures will be required, forwarded to the project proposer and incorporated into construction notes to avoid any potential impacts

to the Blanding's turtle. The permit for the take of endangered or threatened species has been added to the required permits and approvals table as shown below in the 5. Findings of Fact, Part C.

#### Page 25, Dust and Odors

**Comment.** If water for dust control is taken from a lake, river, or stream in volumes that exceed 10,000 gallons per day, or one million gallons per year, then a DNR Water Appropriations Permit will be required.

**Response:** The water appropriations permit is called out in the Required Permits and Approvals of the Proposed Project (Table 5) table for construction dewatering. This comment will be forwarded onto the project proposer should water from a lake, river, or stream be used for dust control.

#### 4.2 COMMENTS FROM THE GENERAL PUBLIC

#### 4.2.1 Nicki Roland Ecker – August 25, 2022

**Comment:** Nicki states that she wants to know the best way to stay informed on the development. Nicki states that this development would be a devasting addition to the already under-supported schools and infrastructure.

**Response:** The City of Lino Lakes meets with the school districts annually to discuss potential development proposals so the school districts can plan accordingly. The project is also spread across two different school districts.

#### 4.2.2 Anna Jungbauer – August 25, 2022

**Comment:** Anna states that she is curious how to find out how the proposed development will impact all the city resources including roads, schools, and public safety resources. She is concerned that this massive development will impact residents currenting living in the area with issues such as school levy money and increased property taxes.

**Response:** The City of Lino Lakes (Katie Larsen) followed up with Anna in an email on 8/25/2022 and let her know where to stay informed about the development as well as the next steps the developer may take after Council reviews the EAW in October.

The impact to the existing roadways this development connects to has been extensively studied with the Traffic Study located in Appendix F of the EAW and has been reviewed by the City. Traffic impacts will be analyzed during the City re zoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements.

Regarding schools and school levy money, the City of Lino Lakes meets with the school districts annually to discuss potential development proposals so the school districts can plan accordingly. The project is also spread across two different school districts.

Additionally, the county assesses property taxes on a regular basis and there is no evidence that this proposed development will impact property taxes.

#### 4.2.3 Morgan C – August 25, 2022

**Comment:** Morgan expressed concern about adding 707 units to the sod field when there are two new developments located near the elementary school and across from the sod field. Morgan is concerned that this will cause overcrowding and poses the question if there has been any thought that this could cause an increase to classroom sizes at the elementary school. Additionally, she states that the only way she would support this if there are less units proposed and a pool added that Morgan's HOA could have access to.

**Response:** The City of Lino Lakes meets with the school districts annually to discuss potential development proposals so the school districts can plan accordingly. The project is also spread across two different school districts.

#### 4.2.4 Justin Carver – August 26, 2022

**Comment:** Justin states in an email that he has many questions and concerns with the development and wants to discuss this with Katie Larsen on the phone.

**Response:** The City of Lino Lakes (Katie Larsen) followed up with Justin in an email on 8/29/2022 and let him know where to stay informed about the development as well as the next steps the developer may take after Council reviews the EAW in October.

#### 4.2.5 Mike Trudeau – August 30, 2022

**Comment:** Mike wants to know where the single family and townhome/higher density units will be proposed for the development as he is concerned about townhome/higher density units impacting his property value. Mike lives along Robinson Drive that borders the proposed development to the south.

**Response:** Katie Larsen addressed Mr. Trudeau's concerns in an email exchange between August 29<sup>th</sup> and August 30<sup>th</sup>. Katie states that per the EAW, Figure 2. PUD Concept Plan shows a 557 unit development with single family homes behind Robinson Drive. Figure 3. Yield Plan shows a 707 unit development with single family homes and townhomes behind Robinson Drive. There are no apartments proposed behind Robinson Drive. Additionally, she says that as the project moves forward, the developer will submit a PUD Development Stage Plan/Preliminary Plat that will better define the project. Public hearings will be held and notices will be sent again to property owners in the area for additional comments.

#### 4.2.6 Mara Lipinski – September 5, 2022

**Comment:** Mara has concern that such a large development is not wise to construct since the City of Lino Lakes has a difficult time keeping up with maintaining the current small developments in the area. Specifically, Mara is concerned that the City of Lino Lakes does not

mow the boulevard as often as they should, they do not maintain all trails, they don't replace dead trees, and they rarely snow blow in the winter.

**Response:** The City makes every effort to maintain infrastructure and open areas. Unimproved park areas and trails, such as those along Robinson Drive, are maintained on a limited basis during both summer and winter. Development of the Robinson sod farm will lead to completion of the Century Farm North Park and trail system. Increased maintenance of these areas will result from those improvements.

#### 4.2.7 Greg and Sarah Austin – September 10, 2022

**Comment:** The Austin's explained in their letter that they have concerns regarding the proposed development. These include:

- There is concern that adding this development into a drainage system that already has a problem will only amplify the drainage issues. Specifically, the Austin's are concerned that the project could conceivably change the flood status of the area and threaten existing homes, buildings, and properties in the area.
- The Austin's state that the sod farm and the surrounding wetlands and ditches are major nesting/rearing grounds for many species of migratory and local waterfowl, songbirds, deer, and predators from raptors to coyotes. They argue that the threat to their local treasures, the Rice Creek and lakes would be threatened by increased herbicide, pesticide, and salt runoff from the new development. They strongly recommend that the sod farm become an extension of the Carlos Avery wildlife area, or some other special green space or park, which are lacking and being diminished in Anoka County
- There is concern about the amount of traffic added to Century Trail, Robinson Trail, and Sunset Road. The added traffic to these roads is a safety concern as this development has the potential to turn these streets into high-speed thoroughfares and become dangerous to bicycles and pedestrians.

#### **Response:**

- The public drainage system and most of the private drainage system on site will remain the same. The proposed development is required to meet the stormwater runoff quality and quantity requirements of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System (NPDES/SDS). Therefore, the stormwater basins on site will be designed to meet these requirements. Additionally, since the site falls within the 100 year floodplain, the development is required to follow the City and Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation. These requirements will aide in controlling drainage on site to avoid impacts to the surrounding area.
- The current conditions of the site include the use of agriculture fertilizers, a monoculture of sod grass, and a private and public drainage system. The proposed

development is expected to add open water features that currently do not exist on site and to plant native vegetation throughout the site. The open water areas can provide fly over habitat for migratory and local waterfowl and the native vegetation can provide additional wildlife habitat that currently does not exist. Thus, there is not expected to be a significant impact to wildlife species with this development. The City will require protective buffers adjacent to all water features.

• A Traffic Impact Study located in Appendix F of the report extensively modeled the impact of the proposed development on the surrounding roadways. and found that the proposed development is expected to have limited impact on the study area traffic operations with no significant side-street delay or queuing issues. Traffic impacts will be further analyzed during the City rezoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements.

#### 4.2.8 Carl Street Residents – September 12, 2022

**Comment 1.** During the morning traffic rush there may be over 1,000 vehicles using the Carl Street and 4th Avenue intersection, per the EAW projections. Did the traffic study take into consideration the potential intersection density at 4th Avenue and Carl Street?

#### **Response:**

- Under forecast Year 2040 build conditions, <u>daily</u> traffic volumes along Carl Street are projected as follows (See Figures 11-14 in the Traffic Study in Appendix F of the EAW):
- Approximately 180 daily vehicles with no proposed development connection to Carl Street
- Approximately 1,480 daily vehicles with a proposed development connection to Carl Street under the PUD Concept Plan
  - Peak hour traffic volumes along Carl Street are expected to be significantly lower than this anticipated daily traffic volume
- Approximately 1,780 daily vehicles with a proposed development connection to Carl Street under the Yield Plan
  - Peak hour traffic volumes along Carl Street are expected to be significantly lower than this anticipated daily traffic volume (see example below)

Peak Hour Example: Under forecast Year 2040 build conditions, the Yield Plan <u>peak hour</u> traffic volumes along Carl Street are projected as follows (See Figure 14 in the Traffic Study in Appendix F of the EAW):

- Slightly more than 150 vehicles are projected along Carl Street during the AM peak hour
- Slightly more than 180 vehicles are projected along Carl Street during the PM peak hour

Yes, the Traffic Impact Study in Appendix F accounts for projected traffic density with respect to intersection capacity. Under all forecast year 2025 and year 2040 build models, the 4th Avenue/Carl Street intersection is expected to function with minimal

delay (Level of Service A) (See Tables 8-15 in the Traffic Study in Appendix F of the EAW). Level of Service A is in compliance with industry standard practice for acceptable traffic mobility performance.

**Comment 2.** Was a comprehensive traffic impact study conducted to evaluate the potential traffic backup on Carl Street during the busy morning and evening hours?

**Response:** Yes, the Traffic Impact Study in Appendix F of the EAW accounts for projected vehicle queuing during the AM & PM peak hours. Under all forecast year 2025 and year 2040 build models, the industry standard 95th percentile queue (length of queue with only a five percent probability of being exceeded) on the Carl Street approach to 4th Avenue is expected to be less than 55 feet (the equivalent of 2-3 vehicles). (See the 95<sup>th</sup> percentile queues in the tables of Appendix A in the Traffic Impact Study located in Appendix F of the EAW).

# **Comment 3.** Do the Anoka County traffic projections and studies align with those from Alliant Engineering?

**Response:** Annual average daily traffic (AADT) volumes forecast in the Anoka County Year 2040 Transportation Plan Update are comparable to daily volumes forecast under Year 2040 Build Conditions in the Traffic Impact Study.

# **Comment 4.** Did the City of Lino Lakes or Alliant Engineering take into consideration the current aquifer depletion issue taking place on the Lino Lakes border in Blaine?

**Response:** The drawdown issue referred to is related to new high production municipal wells located in the City of Blaine and is most pronounced during the relatively infrequent condition that multiple wells are pumping simultaneously during maximum day water demand. The Robinson development area will be served by Lino Lakes municipal water system which draws water from a different aquifer on the south side of Lino Lakes. The deep irrigation well that currently serves to irrigate the sod farm will be removed with the project.

**Comment 5.** Does the City of Lino Lakes plan to warrant the costs of the wells for current property owners near the potential project?

Response: No. The City does not anticipate any impacts to offsite wells.

# **Comment 6.** Did the City of Lino Lakes or Alliant Engineering investigate the possibility for flooding due to the high-water table and the redistribution of water?

**Response:** Alliant Engineering has prepared the required floodplain calculations and models for the proposed floodplain mitigation on site per Rice Creek Watershed requirements and submitted this to Rice Creek Watershed District for review and approval. Additionally, Alliant has prepared the required stormwater calculations for the site per Rice Creek Watershed District regulations. This has been sent to Rice Creek Watershed District for review and approval. All stormwater and floodplain calculations

and design will be subject to review and approval by the City Engineer, consistent with City requirements, as part of the rezoning and preliminary plat review.

# **Comment 7.** Did the City of Lino Lakes or Alliant Engineering initiate a study to determine if "Quiet Enjoyment of Life" would be impacted or violated by the proposed street connection?

**Response:** No. There is no established City requirement or standard related to "Quiet Enjoyment of Life". The proposed development is subject to to existing City Code requirements. The residential use of the site will be required to adhere to the city's noise ordinances. After construction, noise levels are expected to be at or near existing levels.

## **Comment 8.** Did the City of Lino Lakes or Alliant Engineering consult Anoka County to determine property value losses if the cul-de-sac is removed?

**Response:** A property value study is not part of the environmental assessment review.

**Comment 9.** Does Anoka County plan to reassess property value losses and adjust home values and taxes accordingly if Carl Street is connected.

**Response:** Anoka County assesses property on a regular basis, regardless of development. There is no information that suggests a loss in property value.

**Comment 10.** Did the City of Lino Lakes or Alliant Engineering consult with Rice Creek Watershed District on the disruption to the waterways, ditches, and wetlands within the impact area?

**Response:** Yes, the developer has hired a consultant to conduct the wetland delineation and wetland impact permit application of the site per the Wetland Conservation Act, Section 404 of the Clean Water Act regulations. Rice Creek Watershed District is the Local Government Unit that administers the Wetland Conservation Act and has been working closely with the consultant on reviewing any waterway, ditch, and wetland impacts from the proposed development. The wetland delineation report and permit application will need to be formally reviewed and approved by Rice Creek Watershed District, the Board of Soil and Water Resources, the U.S. Army Corps of Engineers and any other regulatory authority on the Technical Evaluation Panel.

**Comment 11.** Many pedestrians, dog walkers, and bicyclists use the path at the end of the culde-sac because they feel safe on Carl Street. Children cannot bike or walk on Lilac or 4th St because they both are busy with traffic speeds far over the posted limits. Has this been taken into consideration and are the proposed traffic areas in compliance with the Local Road Research Board (LRRB)?

**Response:** Any proposed improvements to Carl Street would include off-street pedestrian facilities. This would be evaluated as part of future land use approvals. The Local Road Research Board does not establish transportation engineering standards.

Comment 12. How will the ACD-10-22 main trunk and BR2 be preserved and protected?

**Response:** The ACD-10-22 main trunk and BR2 will be protected with a minimum 20' easement that extends out from the top of the ditch bank. Additional buffer and easement width will be evaluated as part of the rezoning and preliminary plat review.

**Comment 13.** How will the vegetation and water conservation be enhanced in the disturbed waterways in the project boundaries?

**Response:** The private ditches within the Project Site will have a minimum 10' vegetated no mow buffer around them and the public drainage ditches on site will have a mimimum 20' easement around them to protect them. A series of stormwater basins are proposed on site that are subject to stormwater requirements from the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System to pre-treat water running off from the surrounding development before it is discharged into any receiving waters. This will improve the water quality of the ditches since they currently receive direct runoff from the sod farm without any pretreatment.

**Comment 14.** Where in the EAW report can we find information from the MN Dept of Agriculture, the Dept of Hydrogeology or Climatology regarding the sequela of years of accumulation of fertilizers and pesticides from the sod farm land upon our disturbed soil, ground water, and well water?

**Response:** The EAW's purpose is to focus on the environmental impacts of the proposed development. The existing condition of the property as a sod farm is in compliance with the MN Department of Agriculture guidelines and regulations. The MN Department of Agriculture would be the regulatory agency to contact for this information.

**Comment 15.** In 1977 the Carl Street residents were assured there would be no Carl St connection and the cul-de-sac would remain. In 1986, 2006, and now, despite the developer's original concept plan where Carl Street is not mentioned as a variable, would you please clarify as to why Carl Street is repeatedly targeted for change, negatively affecting our property values, safety, well-being, wildlife, creek, and vegetation?

**Response:** The Carl Street connection will be a policy decision from the City Council based on sound engineering judgment. The Carl Street connection has been identified as a through connection in several planning documents (2040 Comprehensive Plan Future Roadway System Figure 6-13, Lino Lakes 2030 Transportation Comprehensive Plan Future Roadway System Figure 6-12, 2001 Lino Lakes Transportation Plan) and right of way was platted from 4th Avenue to Sunset Avenue originally in 1977.

**Comment 16.** The trajectory of land development leads to increased noise, cutting down of trees, causing damage and instability to wildlife, clean water, vegetation, pollinator insects, soil and other ecosystems. Will this result in the formation of "heat islands" caused by those losses and the absorption of more heat by impervious pavement including sidewalks, parking areas and adverse effects on our climate, air and water quality?

**Response:** The current conditions of the Robinson Sod Farm include an existing sod farm agriculture area that consists of a monoculture of sod farm grass and a minimal amount of trees. Additionally, the site is currently not subject to pre-treating water through stormwater basins before the water enters the private and public drainage ditches on site. The proposed residential development will add impervious pavement areas; however, the development will be subject to the local, state, and federal water quality regulations. Among these will be to include stormwater basins to pre-treat water before it enters into any receiving waters on site thus improving water quality leaving the site, including floodplain mitigation on site, and adding landscaping including native vegetation and landscape trees to off-set the potential formation of a "heat island."

In addition the City requires placement of boulevard trees to off-set heat island effects. The City also requires tree and shrubs to be planted within all open space areas.

**Comment 17.** Did the City of Lino Lakes or Alliant Engineering consult with the FAA regarding traffic proximity to the Lino Air Park airstrip?

**Response:** No, and there is no requirement for that.

**Comment 18.** Did the City of Lino Lakes or Alliant Engineering conduct a traffic analysis relevant to headlight penetration onto the Lino Air Park airstrip as this can cause temporary flash blindness? This will be a safety hazard to pilots.

**Response:** This is not evaluated as part of the environmental process. The city does not anticipate that traffic generated by the project would create any safety hazards to the private air strip. Residential development currently abuts the airpark.

**Comment 19.** Has the risk of increased traffic on Carl Street in proximity to the Lino Air Park been considered secondary to vehicle drivers being distracted while watching airplanes take off and land, thus not watching our children playing or residents walking or biking down Carl Street?

**Response:** This is not evaluated as part of the environmental process. Traffic is evaluated as part of the land use approvals and uses sound engineering judgment to make decisions.

**Comment 20.** How was a 2-day traffic study on Carl Street "valid" both in methodology and analysis assuring "statistical significance levels?"

**Response:** The traffic data collection time periods and dates are in compliance with industry standard best practices for traffic impact studies.

**Comment 21.** When is the Planning & Zoning commission conducting a hearing and vote on changing the Robinson property zoning from agricultural to residential?

**Response:** The meeting will be scheduled upon the receipt of a complete land use application, which has not yet been received.

#### 4.2.9 Ann Rudie – September 12, 2022

**Comment.** Ann lives in the Century Farm neighborhood and has concerns about the safety of young children in the neighborhood with Robinson becoming a thru street to the new development. She states that she is opposed to the project because of the traffic volume increase here. She has proposed three questions about the development:

- What has the city done to study the impact of this increase in traffic?
- How will the city address the ongoing water quality problem with a project of this size and will new residents be made aware of the manganese issues?
- Is there a demonstrated need for more housing?

#### **Response:**

- As part of the EAW, a Traffic Impact Study was conducted to assess the increase in traffic in the area and is included in Appendix F of the EAW. This study was reviewed and approved by the City of Lino Lakes before it was distributed in the EAW.
- The City will continue to work on seeking solutions for the high manganese levels in the drinking water and educating the public through the online "Public Water Advisory" section of the City's website about any updates to the current water quality situation. The City is currently preparing plans and specifications for construction of a water treatment plant that will resolve the manganese issue.
- Property owners have a right to development their property in accordance with the City's Comprehensive Plan and Ordinances. The City of Lino Lake's 2040 Comprehensive Plan provides projections for the future land use of the City and has split the site into four planned land uses. These include Low Density Residential for the west and south portions of the project and then a mix of Medium Density Residential, High Density Residential, and Planned Residential/Commercial for the central and northern parts of the project. This is based on the future projected population growth of the City and the City's goals to provide more mixed use housing.

#### 4.2.10 Doug and Cindy Hansen – September 12, 2022

**Comment.** The Hansen's live along Carl Street and have proposed the following concerns about the development. These include:

- The Robinson Sod Farm development will add to the already stressed municipal sewer and water systems. They are concerned that a negative water management outcome could occur as a result of rapid development in the City.
  - The Hansen's would like assurance from the City of Lino Lakes and Council to have a prudent approach including an aggressive water management plan that can handle this addition.
- This resident states they were told by the City Engineer of Lino Lakes that when they purchased their property back in 2013, there was no intention of connecting any future residential developments from the sod farm to Carl Street.

 Carl Street has also been used as a main walking and bike path since it is not a main thoroughfare and the traffic is limited. Additionally, there is a nature path used daily by Carl Street residents and residents from the surrounding developments. The residents are concerned that a street connection from the Robinson Sod Farm to Carl Street will destroy the nature path and traffic will endanger the humans and wildlife that utilize this area for recreation and habitat.

#### **Response:**

- The City of Lino Lakes requires that developers adhere to the local, state, and federal regulations related to water management. The project developer will need to obtain the necessary permits and approvals from these regulatory authorities prior to development of the site.
- The Carl Street connection will be a policy decision from the City Council based on sound engineering judgment. The Carl Street connection has been identified as a through connection in several planning documents (2040 Comprehensive Plan Future Roadway System Figure 6-13, Lino Lakes 2030 Transportation Comprehensive Plan Future Roadway System Figure 6-12, 2001 Lino Lakes Transportation Plan) and right of way was platted from 4th Avenue to Sunset Avenue originally in 1977.

#### 4.2.11 Steven Anderson – September 12, 2022

**Comment.** Steven states that he has concerns about the proposed development. These concerns include:

- The proposed housing development will negatively impact local residents and their properties due to the drainage restructuring required for this housing proposal with buildings, paved streets, driveways, and patios. Without the water retention of the sod farm and increase runoff and potential for flooding, the project could conceivably change the flood status of the area, and threaten existing homes, buildings, and properties.
- Strongly recommends that the sod farm become an extension of the Carlos Avery Wildlife area, or some other special green space or park because the proposed development will likely cause irreparable damage to wildlife in the area due to increase herbicide, pesticide, and salt runoff from the new development.
- There is a current traffic problem that will evolve from the proposed project.

#### **Response:**

 The public drainage system and most of the private drainage system on site will remain the same. The proposed development is required to meet the stormwater runoff quality and quantity requirements of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System (NPDES/SDS). Therefore, the stormwater basins on site will be designed to meet these requirements. Additionally, since the site falls within the 100 year floodplain, the development is required to follow the Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation. These requirements will aide in controlling drainage on site to avoid impacts to the surrounding area.

- The current conditions of the site include the use of agriculture fertilizers, a monoculture of sod grass, and a private and public drainage system. The proposed development is expected to add open water features that currently do not exist on site and to plant native vegetation throughout the site. The open water areas can provide fly over habitat for migratory and local waterfowl and the native vegetation can provide additional wildlife habitat that currently does not exist. Thus, there is not expected to be a significant impact to wildlife species with this development.
- A Traffic Impact Study located in Appendix F of the report extensively modeled the impact of the proposed development on the surrounding roadways and found that the proposed development is expected to have limited impact on the study area traffic operations with no significant side-street delay or queuing issues. Traffic impacts will be further analyzed during the City rezoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements.

#### 4.2.12 Scott Zbikowski – September 13, 2022

**Comment.** Scott lives a half a block south of the proposed development and states that he has three main concerns:

- The impact of the deletion or natural drainage/absorption into the soil since the proposed development has a relatively low elevation with poor drainage. There is great concern about the stress to drainage ditch ACD 10-22-32 since it was not designed for high density housing. The square feet of housing, driveways, streets, and sidewalks greatly effects the natural absorption of natural rainfall
- The additional traffic impact this development will have on the surrounding streets. There is concern about the traffic volume onto Sunset Road and 4<sup>th</sup> Street from the development as both roads are two lanes with no sidewalks. There is a concern about safety unless these roads and those they connect to are improved prior to the development of the proposed development.
- There is a safety concern that a Carl Street connection would impact the airpark by adding traffic to this area.

#### **Response:**

 The public drainage system and most of the private drainage system on site will remain the same. The proposed development is required to meet the stormwater runoff quality and quantity requirements of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System (NPDES/SDS). Therefore, the stormwater basins on site will be designed to meet these requirements. Additionally, since the site falls within the 100 year floodplain, the development is required to follow the Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation. These requirements will aide in controlling drainage on site to avoid impacts to the surrounding area.

- A Traffic Impact Study located in Appendix F of the report extensively modeled the impact of the proposed development on the surrounding roadways and found that the proposed development is expected to have limited impact on the study area traffic operations with no significant side-street delay or queuing issues. Traffic impacts will be further analyzed during the City rezoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements.
- The city does not anticipate that traffic generated by the project would create any safety hazards to the private air strip and any potential changes would be evaluated as part of future land use approval reviews.

#### 4.2.13 Lisa and Ernst Olsen – September 14, 2022

**Comment.** Lisa and Ernst provided an email and comments throughout the EAW document. There main concerns are that extending to Carl Street will destroy their existing neighborhood by adding addition traffic to their road and threatening the safety of pedestrians and wildlife. Additionally, they are concerned that their wells and mound system will be destroyed by the proposed development.

• **Response:** The Carl Street connection will be a policy decision from the City Council based on sound engineering judgment. The Carl Street connection has been identified as a through connection in several planning documents (2040 Comprehensive Plan Future Roadway System Figure 6-13, Lino Lakes 2030 Transportation Comprehensive Plan Future Roadway System Figure 6-12, 2001 Lino Lakes Transportation Plan) and right of way was platted from 4th Avenue to Sunset Avenue originally in 1977. The City does not anticipate any impacts to the surrounding resident's wells and mound system.

#### 4.2.14 Kevin and Tammy Dunrud – September 14, 2022

**Comment.** Kevin and Tammy state in their letter that they are concerned about the following items:

- Concerned that the alteration to 100 plus year drainage complexes in the area will negatively impact the established 100 year floodplain. Currently, the sod farm and surrounding drainage ditches can handle the water drainage and runoff, but with this huge development and the potential rise in the water table, will this continue to be true?
- Concerned that their wood foundation home will incur water damage. Has the City of Lino Lakes or Alliant Engineering contacted the Corps of Engineers or the appropriate governing body to determine how the established 100 year floodplain will be impacted by massive water redistribution?

#### **Response:**

- The public drainage system and most of the private drainage system on site will remain the same. The proposed development is required to meet the stormwater runoff quality and quantity requirements of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System (NPDES/SDS). Therefore, the stormwater basins on site will be designed to meet these requirements. Additionally, since the site falls within the 100 year floodplain, the development is required to follow the Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation. These requirements will aide in controlling drainage on site to avoid impacts to the surrounding area.
- Alliant Engineering has prepared the required floodplain calculations and models for the proposed floodplain mitigation on site per Rice Creek Watershed requirements and submitted this to Rice Creek Watershed District for review and approval. Additionally, Alliant has prepared the required stormwater calculations for the site per Rice Creek Watershed District regulations. This has been sent to Rice Creek Watershed District for review and approval. All stormwater and floodplain calculations and design will be subject to review and approval by the City Engineer, consistent with City requirements, as part of the rezoning and preliminary plat review.

#### 4.2.15 Reilly Anderson – September 15, 2022

**Comment.** Reilly states that he has concern and is opposed to the proposed development. These concerns include:

- The proposed housing development threatens to further fragment the habitats of birds and other wildlife within Anoka County and will add new stressors to the local environment.
- As summer weather becomes increasingly extreme and unpredictable, newly constructed impervious surfaces will further stress the local aging drainage systems, threatening the homes and properties of existing area residents with flooding, many of which were built many years ago.
- There is concern that the proposed new roads and feeder routes will be ineffective in mitigating the existing traffic issues in the area. The addition of the proposed high density housing will add a critical amount of new motor traffic that will exceed the local infrastructure's ability to provide safe streets.

#### **Response:**

 The current conditions of the site include the use of agriculture fertilizers, a monoculture of sod grass, and a private and public drainage system. The proposed development is expected to add open water features that currently do not exist on site and to plant native vegetation throughout the site. The open water areas can provide fly over habitat for migratory and local waterfowl and the native vegetation can provide additional wildlife habitat that currently does not exist. Thus, there is not expected to be a significant impact to wildlife species with this development.

- The public drainage system and most of the private drainage system on site will remain the same. The proposed development is required to meet the stormwater runoff quality and quantity requirements of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA National Pollutant Discharge and State Disposal System (NPDES/SDS). Therefore, the stormwater basins on site will be designed to meet these requirements. Additionally, since the site falls within the 100 year floodplain, the development is required to follow the Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation. These requirements will aide in controlling drainage on site to avoid impacts to the surrounding area.
- A Traffic Impact Study located in Appendix F of the report extensively modeled the impact of the proposed development on the surrounding roadways and found that the proposed development is expected to have limited impact on the study area traffic operations with no significant side-street delay or queuing issues. Traffic impacts will be further analyzed during the City rezoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements.

# 5. FINDINGS OF FACT

# 5.1 PROJECT DESCRIPTION

# 5.1.1 Proposed Project

The Robinson project is a proposed low, medium, and high density residential development on an existing 158-acre agricultural area in the City of Lino Lakes, Anoka County, Minnesota. Two site plan alternatives have been developed for the project:

- PUD Concept Plan The PUD concept plan is expected to consist of 557 dwelling units of the following types:
  - 242 single family detached homes
  - o 315 townhomes
- Yield Plan The yield plan, considered close to the maximum density allowed under future year 2040 land use plans, is expected to consist of 707 dwelling units of the following types:
  - 263 single family detached homes
  - o 164 townhomes
  - o 280 multi-family units

The project is located to the southeast of Sunset Avenue and 125<sup>th</sup> Ave NE (Main Street, CSAH 14). The project will include new roads, stormwater features, and the installation of municipal sewer and water systems.

# 5.1.2 Site Description and Existing Conditions

The existing conditions present on site include sod farm agriculture that consists of a series of public and private drainage ways. The site has been used for agriculture production for decades. The majority of the site occurs in predominately hydric soil.

# 5.1.3 Decision Regarding the Potential for Significant Environmental Effects

Minnesota Rules 4410.1700, Subp. 7 lists four criteria that shall be considered in deciding whether a project has the potential for significant environmental effects. Those criteria and the City's findings are presented below.

# A. Type, Extent, and Reversibility of Environmental Effects

Minnesota Rules 4410.1700, Subp (A) indicates the first factor that the City must consider is the "type, extent, and reversibility of environmental effects." The City's findings are set forth below.

# 1. Cover Types

The project will convert an approximately 158-acre site consisting predominately of sod farm agriculture land to low, medium, and high density residential development, stormwater infrastructure, lawn/landscaping, and an internal roadway network.

# 2. Shorelands and Floodplains

The majority of the site falls within the 100 year FEMA floodplain area and Rice Creek Watershed District floodplain area. The project is not within or adjacent to a wild and scenic river, critical area, agricultural preserve, or shoreland overlay district. The development is required to follow the Rice Creek Watershed District floodplain mitigation requirements and implement on-site floodplain mitigation.

# 3. Land Use

The project is compatible with surrounding land uses and the City of Lino Lake's 2040 Comprehensive Plan Update. The 2040 Comprehensive Plan shows the planned land use for the Project Site to be a mix of low, medium, and high residential density.

### 4. Geology and Soils

The grading operations will disturb approximately 158 acres and require an estimated 600,000 cubic yards of grading on-site. Grading activities will construct new roads, building residential pads, and stormwater features.

# 5. Water Quality

Compliance with stormwater requirements will minimize and mitigate potential adverse effects on receiving waters. Project construction will add impervious surface to the site

which consists of streets, residential homes, and driveways. Stormwater rate and volume controls will limit increases in runoff volume and associated pollutant transport. Stormwater basins are expected to mitigate potential adverse effects on water quality.

### 6. Wetlands and Surface Waters

The wetland delineation survey was conducted in the summer of 2022 and delineated wetlands and public and private drainage ways on site. The wetland delineation report is currently under review with the Technical Evaluation Panel (TEP) which consists of Rice Creek Watershed District, the Board of Water and Soil Resources (BWSR), Anoka County Conservation District, and the Army Corps of Engineers. If any of these delineated features is impacted on site, the project proponent will need to obtain a Minnesota Wetland Conservation Act and Section 404 of the Federal Clean Water Act permit, and Section 401 Clean Water Act Water Quality Certification.

### 7. Wastewater

The project is expected to produce normal domestic wastewater that will be typical of residential developments and will be designed within the limitations of the existing sanitary sewer system.

### 8. Hazardous Materials

Review of the MPCA and MDA's "What's in my Neighborhood" (WIMN) interactive website identified 1 inactive brownfield on the Project Site and one petroleum tank release immediately to the north of the site.

A Phase I and Phase II Site Assessment was conducted to analyze contamination on site and the MPCA has reviewed the site. The MPCA has issued a no action letter stating that the extent and magnitude of the release has been defined and does not pose a risk to human health or the environment.

In addition to these two areas, there are 10 sites within 0.5 miles of the proposed Project Site as shown in the MPCA's database. The MPCA's website indicates that these sites have been properly investigated and managed. Therefore, these sites are not expected to adversely impact the Project Site.

Prior to the demolition of the existing farmstead buildings, an asbestos and regulated materials (ARM) assessment will be completed and the MPCA will be notified if asbestos containing material (ACM) are identified during the ARM assessment.

# 9. Ecological Resources

The project is expected to convert approximately 158-acres of agriculture into a residential development. The project may disperse less mobile wildlife species during the construction of the residential development, however, changes in wildlife abundance are not expected to be regionally significant. If a threatened and endangered

species survey is necessary for the project, it will be completed prior to construction to ensure no species are impacted. As part of the development protective buffers will be created along waterways and open space will be reestablished with native vegetation and trees, creating addition ecological benefits.

### 10. Historic Resources

A search of the Minnesota Archaeological Inventory and Historic Structures Inventory did not identify archaeological sites or historic structures known to exist in the project vicinity. Additionally, the State Historic Preservations Office confirmed no resources present on the site.

### 11. Visual Resources

There are no scenic views or vistas on or adjacent to the Project Site. Substantial effects on visual resources are not anticipated in conjunction with the project development.

#### 12. Noise

Local noise levels are expected to increase temporarily during project construction and will impact the nearest sensitive noise receptors including the single family residential homes that border the site to the south.

Construction noise can be mitigated by restricting construction work to daytime hours. Contractors will be required to minimize noise impacts by maintaining equipment properly, including noise controls as specified by manufactures. The project will adhere to the City of Lino Lake's noise rules and standards that indicates noise should occur within specified levels depending on land use and time of day.

After construction, noise levels are expected to be at or near existing levels. Noise associated with the project will be related to residential vehicle noise. A combination of berms, landscaping, and fencing will be used to provide noise mitigation for the adjacent residential developments. Similar to construction noise, the residential use of the property will adhere to the City's noise rules and standards. A noise study will be prepared detailing noise mitigation for the site and submitted with the preliminary plat submittal for the development.

### 13. Transportation

A Traffic Study was completed in 2022 to analyze the PUD Concept Plan and Yield Plan. Generally, the proposed development is expected to have minimal impact on study area traffic operations. Thus, no geometric or traffic control improvements are required from an operations perspective. Traffic impacts will be further analyzed during the City rezoning and preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements. Operations analysis results identify a Level of Service (LOS) which indicates the quality of traffic flow through an intersection. Intersections are given a ranking from LOS A through LOS F. LOS A indicates the best traffic operation with vehicles experiencing minimal delays. LOS F indicates an intersection where demand exceeds capacity, or a breakdown of traffic flow. For through/stop intersections, a key measure of operational effectiveness is side-street LOS. The second component of the traffic operations analysis is a study of vehicular queuing, or the lineup of vehicles waiting to pass through an intersection.

Based on the traffic analysis for the site, each study intersection currently operates at overall LOS B during the weekday a.m. and p.m. peak hours. In addition, no significant side-street delay or queuing issues were observed in the field or in traffic simulations.

While roadway improvements are not required from a traffic operations or regional transportation system perspective, recommendations have been provided to improve the flow of traffic throughout the development and onto the main connecting streets.

# B. Cumulative Potential Effects

Minnesota Rule 4410.1700, Subp. 7 (B) indicates that the second factor the City must consider is whether the proposed project has potentially significant cumulative effects. This includes "whether the cumulative potential effect is significant, whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the project proposer to minimize the contributions from the project." The City's findings are described below.

The potential cumulative effects on public infrastructure would include impacts to the municipal water supply systems, sanitary sewer conveyance and treatment systems, stormwater management, and traffic and transportation. The City of Lino Lakes has planned for the growth and increased capacity to address these cumulative impacts as outlined in their 2040 Comprehensive Plan. Thus the cumulative effects on public infrastructure is not expected to be significant.

Cumulative impacts on natural resources include the loss of agricultural land, loss of wetlands, floodplain alteration, and loss of habitat for wildlife that uses the existing sod farm. Surface water runoff from the site will be discharged prior to discharge into any receiving waters. Additionally, the site is subject to floodplain mitigation requirements due to the alteration of the 100 year floodplain. Stormwater regulations, floodplain mitigation on site, and water quality BMPs are expected to minimize cumulative impacts of post-development runoff on receiving waters.

# C. Extent to Which Environmental Effects are Subject to Mitigation

Minnesota Rule 4410.1700, Subp 7 (C) indicates that a third factor the City must consider is the "extent to which environmental effects are subject to mitigation by ongoing public regulatory authority." The City's findings are described in Table 1 below.

Environmental effects on water quality, wetlands, and traffic are subject to additional approvals and/or mitigation through requirements of local, state, and federal regulations, ordinances, management plans, and permitting processes. Potential environmental effects associated with this project will be mitigated in accordance with applicable rules and regulations. The following permits and approvals are required for the project addressed under the EAW.

Unit of Government	Types of Application	Status
Federal		
U.S. Army Corps of Engineers (USACE)	Clean Water Act Section 404 Permit	To be submitted
State		
Minnesota Department of Health (MDH)	Watermain Extension Permit	To be submitted
Minnesota Department of Natural Resources (MN DNR)	Water Appropriation Permit (Construction Dewatering)	To be submitted
	Conditional Letter of Map Revision (CLOMR)	To be submitted, if necessary
	Permit for the Take of Endangered or Threatened Species	If needed
Minnesota Pollution Control Agency (MPCA)	National Pollution Discharge Elimination System (NPDES)/State Disposal System (SDS) General Permit	To be submitted
	Sanitary Sewer Extension Approval	To be submitted
	Section 401 Water Quality Certification or Waiver	To be submitted
	10-day Demolition Notification	If needed
Local		
Rice Creek Watershed District	Wetland Conservation Act Delineation Boundary Concurrence	To be submitted
	Wetland Impact and Replacement Plan	To be submitted
	Stormwater Management Plan	To be submitted
	Erosion and Sediment Control Plan	To be submitted
	Floodplain Alteration Permit	To be submitted
	Public Drainage System Permit	To be submitted

Table 4 (in EAW). Required Permits and Approvals for the Proposed Project

Unit of Government	Types of Application	Status
Federal		
Anoka County	Access Permit(s)	To be submitted
	Right-of-Way Permit	To be submitted
City of Lino Lakes	Rezoning and Preliminary Plat	To be submitted
	Final Plat Approval	To be submitted
	Municipal Water Connection Permit	To be submitted
	Sanitary Sewer Connection Permit	To be submitted
	Grading Permit	To be submitted
	Building Permit	To be submitted

# D. Extent to Which Environmental Effects can be Anticipated and Controlled

Minnesota Rules 4410.1700, Subp 7 (D) indicates the final factor the City must consider is the "extent to which environmental effects can be anticipated and controlled as a result of other environmental studies undertaken by public agencies or the project proposer, including other EISs." The City's findings are set forth below.

- The proposed project design, plans, EAW, related studies, and mitigation measures apply knowledge, approaches, standards, and best management practices gained from previous experience and projects that have, in general, successfully mitigated potential offsite environmental effects.
- 2. The EAW, in conjunction with this document, contains or references the known studies that provide information or guidance regarding environmental effects that can be anticipated and controlled.
- 3. Other project studies under environmental reviews in Minnesota have included studies and mitigation measures comparable to those included in this EAW.
- 4. There are no elements of the project that pose the potential for significant environmental effects that cannot be addressed by the project design, assessment, permitting, and development processes, and by ensuring conformance with regional and local plans.
- 5. The environmental effects of this development can be anticipated and controlled by the permit application and review processes of the City, Watershed District, and others.
- The City of Lino Lakes finds that the environmental effects of the project can be adequately anticipated and controlled given the results of the environmental review and permitting process.

# 6. RECORD OF DECISION

Based on the EAW, the response to comments, and the Findings of Fact, the City of Lino Lakes, the RGU for this environmental review, concludes the following:

- 1. The EAW was prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minnesota Rules, Parts 4410.1000 to 4410.1700 (2015);
- 2. The EAW satisfactorily addressed the issues for which existing information could have been reasonably obtained;
- 3. Based on the criteria established in Minnesota Rules 4410.1700, the project does not have the potential for significant environmental effects;
- 4. The City makes a "Negative Declaration," and
- 5. An EIS is not required.

# Appendix A

AGENCY AND PUBLIC COMMENTS SUBMITTED TO THE CITY OF LINO LAKES



September 9, 2022

Katie Larsen, City Planner City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014-1182

RE: EAW – Robinson Sod Farm T31 R22 S7, Lino Lakes, Anoka County SHPO Number: 2022-2393

Dear Katie Larsen:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project.

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, and no known or suspected archaeological resources located in the area that will be affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please contact Kelly Gragg-Johnson, Environmental Review Program Specialist, at <u>kelly.graggjohnson@state.mn.us</u> if you have any questions regarding our review of this project.

Sincerely,

Sarang. Barners

Sarah J. Beimers Environmental Review Program Manager

# 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

September 13, 2022

Katie Larsen City Planner City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014-1182

Re: Robinson Sod Farm Environmental Assessment Worksheet

Dear Katie Larsen:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Robinson Sod Farm project (Project) located in Lino Lakes, Anoka County, Minnesota. The Project consists of a new 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 Approvals (Item 8)

In accordance with Minnesota Statutes, the Project should include the MPCA as a regulator of all surface waters as defined by Minn. Stat. § 115.01, subd. 22 Waters of the state. Even though there may be surface waters that are determined to be US Army Corps of Engineers non-jurisdictional or exempt from the Wetland Conservation Act, all surface waters are regulated by the MPCA, and any surface water impact needs to be described in the application and may require mitigation.

The scope of a Clean Water Act Section 401 Certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. In addition, the applicant must also submit to the MPCA the Antidegradation Assessment in accordance with water quality standards Minn. R. 7050.0265 and should review the Antidegradation requirements in 7050.0285.

The 401 Water Quality Certification becomes an enforceable component of the associated federal license or permit, issued under either Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. The scope of a Clean Water Act Section 401 Certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. For further information about the 401 Water Quality Certification process, please contact Bill Wilde at 651-757-2825 or william.wilde@state.mn.us.

### Water Resources (Item 11)

Stormwater

• The EAW states the proposed 158-acre residential development is in a 100-year floodplain. The EAW indicates that soil remediation for the construction will be required due to predominately hydric soils on the site and stormwater ponds will be constructed in lieu of infiltrating stormwater to meet volume reduction requirements.

Katie Larsen Page 2 September 13, 2022

- The EAW should consider climate risks associated with increased rainfall regarding the proposed development that could result in the potential for increased flood risk. Filling of wetlands at the site and adding large areas of impervious surfaces is likely to alter the natural hydrology and increase this risk. Efforts to reduce stormwater volume and provide more climate resiliency should be considered. The Project proposer is strongly encouraged to utilize <u>Low Impact Development</u> strategies such as reducing impervious surfaces through use of narrower streets and sidewalks, stormwater reuse and <u>green infrastructure</u> practices to promote retention of stormwater on the site while also providing other environmental benefits.
- During construction, the MPCA National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit (CSW Permit) requires preservation of the existing 50 feet of natural buffer to wetlands on the site. If the existing buffer must be encroached to complete the construction, then redundant (double) down gradient sediment controls must be utilized to protect the wetlands. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or <u>Roberta.Getman@state.mn.us</u>.

#### Contamination/Hazardous Materials/Wastes (Item 12)

Please be aware that farmsteads have the potential for releases or threatened releases of agricultural chemicals. The Minnesota Department of Agriculture (MDA) is the regulatory agency charged with managing the response and cleanup of fertilizers and pesticides. Information regarding the MDA is available on the website at: <u>https://www.mda.state.mn.us/pesticide-fertilizer/spills-cleanup</u>. For questions regarding agricultural chemicals, please contact Cathy Villas-Horns with the MDA at 651-201-6697. For questions regarding waste pesticide containers, please contact Jane Boerboom with the MDA at 651-201-6540.

### Other Potential Environmental Effects (Item 20)

Please note that chloride (salt) is a growing issue for lakes, streams, and groundwater around the state. Chloride can come from both de-icing salt and water softener salt. For the proposed Project, the MPCA recommends smart salting practices for de-icing streets and driveways during the winter weather months and water softening best practices be used year-round. Additional resources are available at: <u>https://www.pca.state.mn.us/business-with-us/statewide-chloride-resources</u>. Katie Larsen Page 3 September 13, 2022

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 EAW, please contact me by email at <u>Karen.kromar@state.mn.us</u> or by telephone at 651-757-2508. Sincerely,

Karen Kromar

This document has been electronically signed.

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

KK:rs

cc: Dan Card, MPCA, St. Paul Roberta Getman, MPCA, Rochester Bill Wilde, MPCA, St. Paul Cathy Villas-Horns, MDA, St. Paul Jane Boerboom, MDA, St. Paul



September 13, 2022

Katie Larsen, City Planner City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014

RE: City of Lino Lakes – Environmental Assessment Worksheet (EAW) – Robinson Sod Farm Metropolitan Council Review No. 22797-1 Metropolitan Council District No. 11

Dear Katie Larsen:

The Metropolitan Council received the EAW for the Robinson Sod Farm project in the City of Lino Lakes on August 9, 2022. The proposed development consists of 158 acres with a mix of low, medium, and high density residential development located southeast of Sunset Avenue and 125th Avenue NE (CSAH 14). The EAW addresses two potential site plans for the project: the PUD Concept Plan and the Yield Plan. The PUD Concept Plan is expected to consist of 557 units with 242 single family lots and 315 townhomes and the Yield Plan is expected to consist of 707 units with 263 single family lots, 164 townhomes, and 280 multi-family units.

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 EIS is not necessary for regional purposes.

We offer the following comments for your consideration.

### Item 6 – Project Description – Forecasts (Todd Graham, 651-602-1322)

Either of the two scenarios presented could yield development beyond previous expectations. The communitywide forecast for Lino Lakes continues to offer growing room. However, the allocation of the forecast to sub city zones can be revised as needed.

The EAW site is the northern half of Transportation Analysis Zone #182. At this time, the City's 2040 Comprehensive Plan expects TAZ #182 to gain +340 households and +853 population during 2020-2040. Should the subject development proceed, several hundreds of excess households would result. City staff can request a TAZ allocation adjustment by contacting Council Research staff.

### Item 6 – Project Description – Housing (Hilary Lovelace, 651-602-1555)

Council staff note that any changes to guiding land use, including changes to percent residential and minimum allowable density, may create inconsistency with regional housing policy and impact the City's ability to participate in Livable Communities Act Programs. Please contact Council staff with any questions.

Item 9 – Land Use – Regional Parks and Trails (Colin Kelly, 651-602-1361)

A planned unit of the Regional Parks System – the Central Anoka County Regional Trail – is immediately adjacent to the project site. Council staff encourages Integrate Properties, LLC and the City of Lino Lakes to coordinate with Anoka County prior to and during any future construction activities to ensure there are no permanent impacts to the planned regional trail as a result of either of the two site plan alternatives discussed.

# Item 11aii – Water Resources – Groundwater (Lanya Ross, 651-602-1803)

The project site is located in the North and East Groundwater Management Area (<u>https://www.dnr.state.mn.us/gwmp/area-ne.html</u>) designated by the Minnesota Department of Natural Resources. Given the range of water supply challenges (quantity and quality) that exist in this part of the metro, the Council encourages the City to collaborate with state partners and/or neighboring communities when expanding or developing new water supplies in this area.

### Item 11bii – Water Resources – Stormwater (Joe Mulcahy, 651-602-1104)

This appears to be a difficult site for intensive development due to a predominance of hydric soils, high water table, wetlands, presence of county and private ditches, and location in the 100-year flood plain. Many of the soil associations listed for the site have severe limitations for dwellings with basements and roadways. The EAW states that the project will result in 50-60 acres of impervious surface and runoff will be treated with stormwater basins.

Taken together, these conditions indicate that the site is a poor candidate for the proposed development. If the proposer is determined to pursue this project, they should work closely with the City and Rice Creek Watershed District to address all these concerns before proceeding.

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 Katelyn Champoux, Principal Reviewer, at 651-602-1831 or via email at <u>katelyn.champoux@metc.state.mn.us</u>. As always, you can also contact your Sector Representative, Patrick Boylan, at 651-602-1438 or via email at <u>patrick.boylan@metc.state.mn.us</u>.

Sincerely,

Ungelak. Porris

Angela R. Torres, AICP, Senior Manager Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division Susan Vento, Metropolitan Council District 11 Patrick Boylan, Sector Representative Katelyn Champoux, Principal Reviewer Reviews Coordinator

N:\CommDev\LPA\Communities\Lino Lakes\Letters\Lino Lakes 2022 Robinson Sod Farm EAW 22797-1.docx

Transmitted by Email



Division of Ecological and Water Resources Region 3 Headquarters 1200 Warner Road Saint Paul, MN 55106

September 15, 2022

Katie Larsen, City Planner City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014-1182

Dear Katie Larsen,

Thank you for the opportunity to review the Robinson Sod Farm Environmental Assessment Worksheet (EAW) in Anoka County. The DNR respectfully submits the following comments for your consideration:

- Page 6, Permits and Approvals. Please include a DNR Permit to Take in the list of required permits and approvals. Protected state-listed species have been identified in the project vicinity. The need for a Permit to Take will be determined as the proposer works through the rare plant survey process.
- 2. Page 12, Wastewater. The proposed plan to add 557 and even up to 707 residential units would presumably add a comparable number of residential water softeners due to the water hardness levels of the City of Lino Lakes municipal water supply. Many Minnesota municipalities are wrestling with high chloride levels in their wastewater (See this recent study on sources of chloride in Minnesota). Chloride is one of the components of salt, which is used in forms such as sodium chloride (table salt), calcium chloride and magnesium chloride (road salts). Sodium chloride is commonly used in home water softeners and by water treatment plants to treat "hard" water. Minnesota generally has groundwater with high levels of calcium and magnesium that must be removed through softening in order to improve taste and prevent lime scale buildup in appliances, pipes and water fixtures. The majority of home water softeners use sodium chloride (NaCl) in a softening process that replaces calcium and magnesium ions with sodium, while the chloride ions are discharged in the wastewater and eventually end up in the environment.

Each community needs to determine which tool is appropriate for their situation. This <u>factsheet</u> suggests ways for homeowners to optimize their water softener salt use, while this <u>link</u> provides resources for cities and examples of how other communities in Minnesota are addressing their high chloride levels. We suggest that as this development moves forward, the City of Lino Lakes consider what strategies can be used to minimize chloride use.

- 3. Page 13, Post-Construction Runoff. Blanding's turtles, a protected state-listed threatened species, have been documented within the project area. Stormwater features may be colonized by Blanding's turtles in the area, therefore we recommend incorporating measures to avoid impacting this species into stormwater management. In years when the stormwater features will be dredged to remove excess sediment, please draw down water levels by September 15th in order to allow turtles to find overwintering habitat elsewhere.
- 4. Page 13, Post-Construction Runoff. We recommend that BWSR-approved, weed-free, native <u>seed mixes</u> be used to the greatest degree possible in stormwater features in order to provide pollinator habitat.
- 5. Page 13, Post-Construction Runoff. The planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training both from cities and counties and from private companies have used their knowledge to reduce salt use and save money for their organizations.

We also encourage cities and counties to consider how they may participate in the <u>Statewide</u> <u>Chloride Management Plan</u> and provide public outreach to reduce the overuse of chloride. Here are some <u>educational resources</u> for residents as well as a <u>sample ordinance</u> regarding chloride use.

- 6. Page 20, Rare Features. This section of the EAW lists the rare species identified in the DNR Natural Heritage Review, but does not include or discuss DNR requirements regarding these species. The statement that, "There are no state listed species within the project site" is incorrect. The Natural Heritage Review letter has concerns about two state-listed species that may occur within the site. The lack of known occurrences within the project boundary does not mean that these species do not use the area. Minnesota's Endangered Species Statute (*Minnesota Statutes*, section 84.0895) and associated Rules (*Minnesota Rules*, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit.
  - Swamp Blackberry (*Rubus semisetosus*), a state-listed endangered species, has been documented in the vicinity of the project. A qualified surveyor needs to conduct a botanical survey if any shrub removal is associated with the proposed project. Surveys must be conducted by a DNR approved surveyor (see attached list) and follow the standards contained in the <u>Rare Species Survey Process</u> and <u>Rare Plant Guidance</u>. Project planning should take into account that any botanical survey needs to be conducted during the appropriate time of the year, which may be limited. Please consult with the NH Review Team (<u>Reports.NHIS@state.mn.us</u>) regarding this process.

- Blanding's turtles (*Emydoidea blandingii*), a state-listed threatened species, have been documented in the vicinity of the proposed project. As such, **the following avoidance measures are required**:
  - Avoid wetland impacts during hibernation season, between October 15th and April 15th, unless the area is unsuitable for hibernation.
  - The use of <u>erosion control</u> blanket shall be limited to 'bio-netting' or 'naturalnetting' types, and specifically not products containing plastic mesh netting or other plastic components.
    - Also, be aware that hydro-mulch products may contain small synthetic (plastic) fibers to aid in their matrix strength. These loose fibers could potentially re-suspend and make their way into Public Waters. As such, please review mulch products and not allow any materials with synthetic (plastic) fiber additives in areas that drain to Public Waters.
  - Areas where there will be construction should be checked for turtles before the use of heavy equipment or any ground disturbance.
  - The <u>Blanding's turtle flyer</u> must be given to all contractors working in the area.
  - Monitor for turtles during construction and report any sightings to the <u>DNR</u> <u>Nongame Specialist</u>, Erica Hoaglund (<u>Erica.Hoaglund@state.mn.us</u>).
  - If turtles are in imminent danger they must be moved by hand out of harm's way, otherwise, they are to be left undisturbed.
- If the above avoidance measures are not possible, please contact Samantha Bump (<u>Samantha.Bump@state.mn.us</u>) as further action may be needed.
- For additional information, see the <u>Blanding's turtle fact sheet</u>, which describes the habitat use and life history of this species. The fact sheet also provides two lists of recommendations for avoiding and minimizing impacts to this rare turtle. Please refer to both lists of recommendations and apply those that are relevant to your project. For further assistance regarding the Blanding's turtle, please contact the DNR Regional Nongame Specialist, Erica Hoaglund.

For additional information, see the <u>Blanding's turtle fact sheet</u>, which describes the habitat use and life history of this species. The fact sheet also provides two lists of recommendations for avoiding and minimizing impacts to this rare turtle. Please refer to both lists of recommendations for your project.

7. Page 25, Dust and Odors. If water for dust control is taken from a lake, river, or stream in volumes that exceed 10,000 gallons per day, or one million gallons per year, then a DNR Water Appropriations Permit will be required.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

Melison Collins -

Melissa Collins Regional Environmental Assessment Ecologist | Ecological and Water Resources Minnesota Department of Natural Resources Phone: 651-259-5755 Email: melissa.collins@state.mn.us

CC: Ian Peterson, Integrate Properties

Equal Opportunity Employer

Hi Nicki,

Thank you for your comments. You can learn more about the proposed Robinson Sod Farm development by reviewing the Environment Assessment Worksheet on the City's website at <u>https://linolakes.us/459/Public-Review-Documents</u>. After Council review of the EAW in October, the developer may proceed forward with preliminary plat and development plans. Formal public hearings will be held during the preliminary plat process. I don't have a schedule for that yet as it will depend on when the developer submits their application.

Thank you,

### Katie A. Larsen, AICP

City Planner 600 Town Center Pkwy Lino Lakes, MN 55014-1182 Direct 651-982-2426 Fax 651-982-2499 <u>klarsen@linolakes.us</u> logo transparent copy



From: Nicki Roland Ecker <nicole.r.roland@gmail.com>
Sent: Thursday, August 25, 2022 11:29 AM
To: Katie Larsen <KLarsen@linolakes.us>
Subject: Main/Sunset Development

**Caution:** This email originated outside our organization; please use caution.

Hi Katie, how are you?

I saw this article and am wondering how to stay informed about it? This would be a devastating addition to our already under-supported schools and infrastructures. We already have too fast much traffic (ie Birch. Main Main Street), a hodge podge high school building and large class sizes.

We don't want to be the next Woodbury.

The houses in Northpoint (houses stacked on top of another), overcrowded CVE are exactly what we don't want. We want land, green space and to be away from the crowded cities we moved away from.

https://www.bizjournals.com/twincities/news/2022/08/24/integrate-homes-lino-lakes-eden-prairie.html

Thanks for your insight & consideration in keeping Lino Lakes a desirable community for those who already live here.

Nicki

Hi Anna,

Thank you for your comments. You can learn more about the proposed Robinson Sod Farm development by reviewing the Environment Assessment Worksheet on the City's website at <u>https://linolakes.us/459/Public-Review-Documents</u>. After Council review of the EAW in October, the developer may proceed forward with preliminary plat and development plans. Formal public hearings will be held during the preliminary plat process. I don't have a schedule for that yet as it will depend on when the developer submits their application.

Thank you,

### Katie A. Larsen, AICP

City Planner 600 Town Center Pkwy Lino Lakes, MN 55014-1182 Direct 651-982-2426 Fax 651-982-2499 <u>klarsen@linolakes.us</u> logo transparent copy

?

From: Anna J <atjungbauer@gmail.com> Sent: Thursday, August 25, 2022 11:40 AM To: Katie Larsen <KLarsen@linolakes.us> Subject: Robinson Development

**Caution:** This email originated outside our organization; please use caution.

Hi Katie,

I am a Lino Lakes citizen and just read in the business journal about the Robinson development. I am curious how to find out how this will impact all of our city resources adding that many homes and people.

Roads, schools, public safety resources etc.

Can you point me in the right direction to learn more? I hit a pay wall in the article but if I read it right there is still opportunities for this to go to public hearing and city council must approve it.

Myself and some neighbors are concerned with these massive developments being put in, without

the builders being on the hook for the schools for the families their developments bring and the current citizens will only have to then battle over school levy \$ and increased property taxes.

Thanks,

Anna

Morning Justin,

You can learn more about the proposed Robinson Sod Farm development by reviewing the Environment Assessment Worksheet on the City's website at <a href="https://linolakes.us/459/Public-Review-Documents">https://linolakes.us/459/Public-Review-Documents</a>. After Council review of the EAW in October, the developer may proceed forward with preliminary plat and development plans. Formal public hearings will be held during the preliminary plat process. I don't have a schedule for that yet as it will depend on when the developer submits their application.

If you have additional questions, certainly feel free to give me a call.

Thank you,

### Katie A. Larsen, AICP

City Planner 600 Town Center Pkwy Lino Lakes, MN 55014-1182 Direct 651-982-2426 Fax 651-982-2499 <u>klarsen@linolakes.us</u> logo transparent copy

From: Justin Carver <justcarve20@yahoo.com>
Sent: Friday, August 26, 2022 9:09 PM
To: Katie Larsen <KLarsen@linolakes.us>
Subject: Robinson Sod Farm (EAW)

Caution: This email originated outside our organization; please use caution.

Hello Katie,

My friends that live down the street from me have showed me the letter they received from The City of Lino Lakes referencing the potential new build of 707 units on the Robinson Sod Farm. I did not receive such notice.

My address is 65 Century Trail.

I have many questions and concerns with what I've read in this letter.

Can you please call me to discuss when you're available.

Justin Carver

651-307-8183

Thank you!

From:	Morgan C.
To:	Katie Larsen
Cc:	Nick Lahood
Subject:	Robison Sod Farm
Date:	Thursday, August 25, 2022 6:45:36 PM

Caution: This email originated outside our organization; please use caution.

Hi Katie,

I live over on Stallion Lane. I think adding 707 units to that sod field is just outrageous when there was just 2 new developments placed by the elementary and just across the sod field. This will cause overcrowding, and has there been any thought that this could cause an increase into classroom sizes at the elementary school?

The only way I would support this is if there is less units placed and a pool is added which our HOA could have access to.

Thanks, Morgan and Nicholas LaHood 165 Stallion Lane Lino Lakes, MN 55014 Sent from my iPhone

From:	Mike Trudeau
To:	Katie Larsen
Subject:	RE: Robinson Sod farm development question
Date:	Tuesday, August 30, 2022 6:27:10 PM
Attachments:	image001.gif
	image002.jpg

Caution: This email originated outside our organization; please use caution.

Thanks Katie – that is very helpful! does not look like townhomes going in behind me, but perhaps I am reading it wrong. With increased traffic perhaps they will need another exit to the north onto main. Otherwise Robinson Drive will become a mini-highway!

Thanks for your direction – appreciate it! MT

Michael G Trudeau, CFP®, FIC Wealth Advisor

Northstar Advisor Group Edgewater Team CA License: 4150818

?

6776 Lake Dr Ste 160 Lino Lakes, MN 55014

**O** 1-651-288-7580 **C** 1-651-402-9578

**F** 1-651-288-7599

Book a meeting with Michael G Trudeau

### <u>Zoom</u>

From: Katie Larsen <KLarsen@linolakes.us>
Sent: Tuesday, August 30, 2022 9:20 AM
To: Mike Trudeau <Mike.Trudeau@Thrivent.com>
Subject: RE: Robinson Sod farm development question

Morning Mike,

The letter referenced the City website. <u>https://linolakes.us/459/Public-Review-Documents</u>. It's a 438 page documents but don't be intimidated! About 400 pages are the appendices. See page 37 and 38 for the maps.

Let me know if you have any questions. Thanks,

### Katie A. Larsen, AICP

City Planner 600 Town Center Pkwy Lino Lakes, MN 55014-1182 Direct 651-982-2426 Fax 651-982-2499 <u>klarsen@linolakes.us</u> logo transparent copy



From: Mike Trudeau <<u>Mike.Trudeau@Thrivent.com</u>>
Sent: Monday, August 29, 2022 5:37 PM
To: Katie Larsen <<u>KLarsen@linolakes.us</u>>
Subject: RE: Robinson Sod farm development question

**Caution:** This email originated outside our organization; please use caution.

Thank you Katie for your insight!

Can you point me to where I can find the PDFs for the EAW/PUD? I would love to see the figures you are referencing below.

Thanks again! Mike

Michael G Trudeau, CFP®, FIC Wealth Advisor

Northstar Advisor Group Edgewater Team CA License: 4150818

?

6776 Lake Dr Ste 160 Lino Lakes, MN 55014

**O** 1-651-288-7580

**C** 1-651-402-9578

**F** 1-651-288-7599

Book a meeting with Michael G Trudeau

# <u>Zoom</u>

From: Katie Larsen <<u>KLarsen@linolakes.us</u>>
Sent: Monday, August 29, 2022 2:36 PM
To: Mike Trudeau <<u>Mike.Trudeau@Thrivent.com</u>>
Subject: RE: Robinson Sod farm development question

Hi Mike,

Per the EAW, Figure 2. PUD Concept Plan shows a 557 unit development with single family homes behind your Robinson Drive single family homes. Figure 3. Yield Plan shows a 707 unit development with single family homes and townhomes behind Robinson Drive. There are no apartments proposed behind Robinson Drive. Take a look at the EAW concepts and you'll get an idea as to what is being contemplated. As the project moves forward, the developer will submit a PUD Development Stage Plan/Preliminary Plat that will better define the project. Public hearings will be held and notices will be sent again to property owners in the area for additional comments.

Certainly let me know if you have any more questions. Your new building seems to be coming along nicely and is looking good!

Thanks,

# Katie A. Larsen, AICP

City Planner 600 Town Center Pkwy Lino Lakes, MN 55014-1182 Direct 651-982-2426 Fax 651-982-2499 klarsen@linolakes.us

logo transparent copy



From: Mike Trudeau <<u>Mike.Trudeau@Thrivent.com</u>>
Sent: Monday, August 29, 2022 1:40 PM
To: Katie Larsen <<u>KLarsen@linolakes.us</u>>
Cc: Mike Trudeau <<u>Mike.Trudeau@Thrivent.com</u>>
Subject: Robinson Sod farm development question

**Caution:** This email originated outside our organization; please use caution.

Hi Katie,

Thank you for your help with our project off Hodgson. I know it was a lot to develop such a small

parcel, but appreciate your work on it. The building is coming along nicely!

So, I guess I can't be one to complain about a development...right?

I live at 87 Robinson Dr., and got the recent letter RE development of 707 units on the Robinson sod farms (right behind my house).

My question is – will the plans be to include single family housing on the west side of the property, and put the town homes/higher density units on the east side? This would align with having single family abut to single family. Which would likely not harm my property value. However, if an apartment went in behind my home, I would think that would very much hurt my value. Can you give me any insight as to where in the parcel would be anticipated locations of single family/townhomes/apartments?

We built in 2017 knowing this eventually would happen...but there was great concern when we got the letter, to think that an apartment could be behind us vs more nice single family homes. I would strongly encourage the city to put the single family units abutting to the single family that is currently there, and keep the higher density stuff over where the current town homes are, if that is possible.

Let me know what you think, thanks so much! Mike Trudeau

Michael G Trudeau, CFP®, FIC Wealth Advisor

Northstar Advisor Group Edgewater Team CA License: 4150818

?

6776 Lake Dr Ste 160 Lino Lakes, MN 55014

**O** 1-651-288-7580**C** 1-651-402-9578

F 1-651-288-7599

Book a meeting with Michael G Trudeau

<u>Zoom</u>

Please do not use email to request, authorize, or affect the purchase or sale of any security or insurance product or service, to send fund transfer instructions, or to effect any other transactions, as we are not authorized to accept these requests in an electronic format. Any such requests, orders, or instructions that you send will not be accepted and will not be processed. If you need immediate assistance with your brokerage account, please call 800-THRIVENT, and say "Securities Brokerage Services."

Thrivent is the marketing name for Thrivent Financial for Lutherans. Insurance products issued by Thrivent. Not available in all states. Securities and investment advisory services offered through Thrivent Investment Management Inc., a registered investment adviser, member FINRA and SIPC, and a subsidiary of Thrivent. Licensed agent/producer of Thrivent. Registered representative of Thrivent Investment Management Inc. Advisory services available through investment adviser representatives only. Thrivent.com/disclosures.

Thrivent Investment Management Inc. outgoing and incoming email is electronically archived and recorded and is subject to review, monitoring and/or disclosure to someone other than the recipient.

ThriventDisclaimer1299457

# **Keara Fehr**

From: Sent: To: Subject: Mara Lipinski <megror04@yahoo.com> Monday, September 5, 2022 7:07 PM Katie Larsen Robinson Sod Farm

Caution: This email originated outside our organization; please use caution.

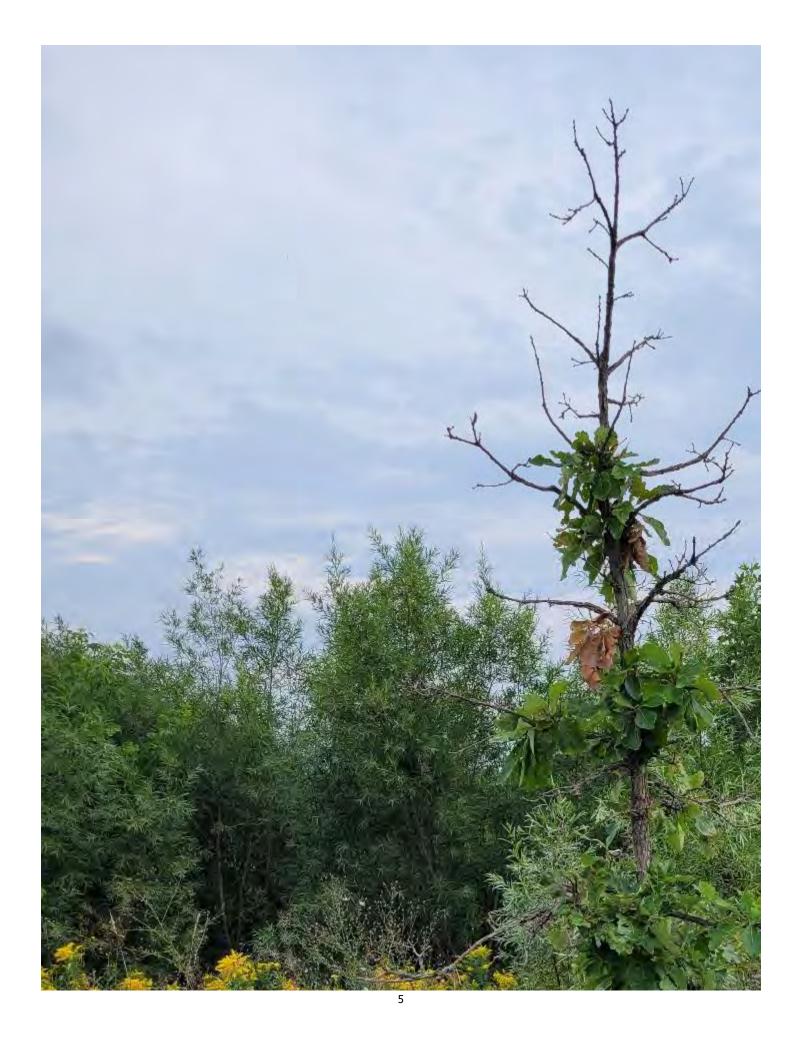
Hello Katie,

I have a few comments regarding the potential development of the Robinson Sod Farm. I don't think it would be wise to create such a large development when the city of Lino Lakes has a hard time keeping up with maintaining the current small development. In fact, the city has point blank told us that they have so many trails to maintain that they forget about ours. They don't mow the boulevard as often as they should (subsection 904 states this should be less than 8 inches), they have trail over hang that isn't cut back, they don't replace dead trees (which we were informed this summer is the city's job), and they rarely snow blow in the winter (subsection 907.03, public nuisances affecting peace and safety-snow must be removed 12 hours after snowfall has stopped, the city has never done this). The pictures below are only a sampling and does not include all.



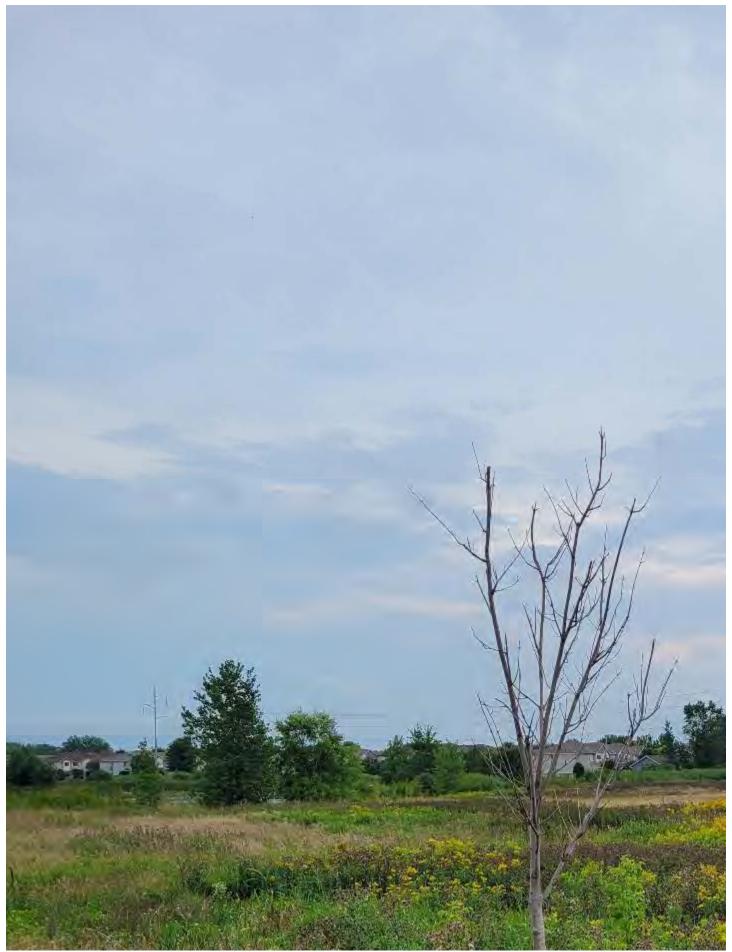














Thank you, Current resident

Sent from Yahoo Mail on Android

**Caution:** This email originated outside our organization; please use caution.

Doug and Cindy Hansen 296 Carl Street Lino Lakes, MN 55014

September 12, 2022

Katie Larsen City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014

Dear Ms. Larsen,

Please accept this as public comment in response to the Environmental Assessment Worksheet for the proposed Robinson Sod Farm development.

In review, the proposal is for approximately 700 municipal sewer and water systems in this development. In Lino Lakes, we already are prohibited from watering 6:00 am to 6:00 pm - 365 days a year and even tighter restrictions are in place from May through September. Just recently, the DNR gave notice to the City requesting that Lino Lakes implement a total irrigation ban. Due to high levels of manganese found in its wells, Lino Lakes was forced to shut one down and operate two wells at a lower pumping rate to service our city. With the Robinson Sod Farm development, over 700 units will be added to this already stressed system.

We would like assurance that the City of Lino Lakes and Council have a prudent approach including an aggressive water management plan that can handle this addition. We were shocked to discover that Lino Lakes, as a city of this size, is just in the preliminary phase of a water treatment plant.

The City of Blaine is experiencing the results of rapid development, dealing with well interference and may incurred the cost of replacing well pumps and/or drilling new wells in Blaine and Ham Lake for private well owners. We would hate to see the same outcome for the Lino Lakes taxpayers.

Another Environmental Impact that must be considered is the nature path that is used daily not only by Carl Street residents but, also residents from surrounding developments. Carl Street has been a main walking and bike path for decades for people of all ages along with their pets. It is a safe zone since it is not a main thoroughfare and traffic is limited. The alternative is Lilac Street which does not have a continuous sidewalk or a bike path. Children have to ride their bikes with traffic - which is posted at 50 mph - to cross from one development to another. With the Robinson development, there is the proposed access to Carl Street and in one plan the distruction of two well established cul-de-sacs on Carl Street and making it a main thoroughfare. In developments where the City of Lino Lakes has planned for a road to be continued, they have posted signs to indicate their intent. This has not been the case on the two Carl Street cul-de-sacs. The only posted signage was put up only a few years ago with concerns of pet waste and prohibiting motorized vehicles.

People are not the only ones using the Carl Street walking path. Two sets of Sandhill Cranes literally walk side by side down the middle of Carl Street and continue on the path while a pair of Bald Eagles watch from our Cottonwood tree. Endangered Monarch butterflies, bees, and hummingbirds have been thriving in my gardens and down the path as they have pollinated this area spreading milkweed, bee balm and their other favorites. Hawks circle above hunting the inhabitants of the area between the two cul-de-sacs and overflow pond. The five deer that surrounded our car on Christmas Eve surprised us all!

The residents of Carl Street are aware of these activities and drive accordingly and very cautiously. If Carl Street is connected with the Robinson development or is forced to have two cul-de-sacs removed and the street connected, this path will be destroyed and traffic, including heavy trucks, will be going 50 mph endangering all living things. It has been proven that even if posted 30 mph, vehicles will be going closer to 50 mph as in the other cases in Lino Lakes. If the City forces the connection of the Robinson development with Carl Street, we can only pray that a child riding a bike or a vehicle driver will not be distracted or looking at a plane instead of watching where they are going and there is a fatality.

It is our understanding that there was only a 2 day study of Carl Street. This neighborhood has data for for over 30 years. As Anoka County and the City of Lino Lakes are aware, this is a designated Air Park.

This is a serious safety and environmental concern. If Carl Street access is granted, it will have a detrimental impact on the existing surrounding residential developments. As it is now, it is a nature walk. Three neighbors each mow three different areas including the path and the North side of Carl Street. We planted 5- 5 foot pine trees on the south side of the path to add to the aesthetics of this nature walkway 9 years ago. Prior to purchasing our property in 2013, the City Engineer told us that the City of Lino Lakes had no intentions of connecting any future residential development from the sod farm to Carl Street. He said that the intent was to come out directly to 4<sup>th</sup> as the 2010 posted plan showed.

We continue to maintain this path without any reimbursement from the City of Lino Lakes or Anoka County. We do it for our community. We do it for those who also live outside of our Carl Street development to enjoy as they use this walking path daily. This is an "Environmental Impact" that is immeasurable and will be taken away from all if Carl Street is used as any type of access for the Robinson Sod Farm development.

Acknowledgement of receiving this email would be appreciated.

Sincerely,

Doug and Cindy Hansen

September 12, 2022 Katie Larsen, City Planner City of Lino Lakes 600 Town Center Pkwy Lino Lakes, MN 55014-1182

Dear Ms. Larsen,

Below please see our questions in response to the Robinson Sod Farm Environmental Assessment Worksheet (EAW) dated August 23, 2022.

- During the morning traffic rush there may be over 1,000 vehicles using the Carl Street and 4<sup>th</sup> Avenue intersection, per the EAW projections. Did the traffic study take into consideration the potential intersection density at 4<sup>th</sup> Avenue and Carl Street?
- 2. Was a comprehensive traffic impact study conducted to evaluate the potential traffic backup on Carl Street during the busy morning and evening hours?
- 3. Do the Anoka County traffic projections and studies align with those from Alliant Engineering?
- 4. Did the City of Lino Lakes or Alliant Engineering take into consideration the current aquifer depletion issue taking place on the Lino Lakes border in Blaine?
- 5. Does the City of Lino Lakes plan to warrant the costs of the wells for current property owners near the potential project?
- 6. Did the City of Lino Lakes or Alliant Engineering investigate the possibility for flooding due to the high-water table and the redistribution of water?
- 7. Did the City of Lino Lakes or Alliant Engineering initiate a study to determine if "Quiet Enjoyment of Life" would be impacted or violated by the proposed street connection?
- 8. Did the City of Lino Lakes or Alliant Engineering consult Anoka County to determine property value losses if the cul-de-sac is removed?
- 9. Does Anoka County plan to reassess property value losses and adjust home values and taxes accordingly if Carl Street is connected.
- 10. Did the City of Lino Lakes or Alliant Engineering consult with Rice Creek Watershed District on the disruption to the waterways, ditches, and wetlands within the impact area?
- 11. Many pedestrians, dog walkers, and bicyclists use the path at the end of the cul-de-sac because they feel safe on Carl Street. Children cannot bike or walk on Lilac or 4<sup>th</sup> St because they both are busy with traffic speeds far over the posted limits. Has this been taken into consideration and are the proposed traffic areas in compliance with the Local Road Research Board (LRRB)?
- 12. How will the ACD-10-22 main trunk and BR2 be preserved and protected?
- 13. How will the vegetation and water conservation be enhanced in the disturbed waterways in the project boundaries?
- 14. Where in the EAW report can we find information from the MN Dept of Agriculture, the Dept of Hydrogeology or Climatology regarding the sequela of years of accumulation of fertilizers and pesticides from the sod farm land upon our disturbed soil, ground water, and well water?
- 15. In 1977 the Carl Street residents were assured there would be no Carl St connection and the culde-sac would remain. In 1986, 2006, and now, despite the developer's original concept plan

where Carl Street is not mentioned as a variable, would you please clarify as to why Carl Street is repeatedly targeted for change, negatively affecting our property values, safety, well-being, wildlife, creek, and vegetation ?

- 16. The trajectory of land development leads to increased noise, cutting down of trees, causing damage and instability to wildlife, clean water, vegetation, pollinator insects, soil and other ecosystems. Will this result in the formation of "heat islands" caused by those losses and the absorption of more heat by impervious pavement including sidewalks, parking areas and adverse effects on our climate, air and water quality?
- 17. Did the City of Lino Lakes or Alliant Engineering consult with the FAA regarding traffic proximity to the Lino Air Park airstrip?
- 18. Did the City of Lino Lakes or Alliant Engineering conduct a traffic analysis relevant to headlight penetration onto the Lino Air Park airstrip as this can cause temporary flash blindness? This will be a safety hazard to pilots.
- 19. Has the risk of increased traffic on Carl Street in proximity to the Lino Air Park been considered secondary to vehicle drivers being distracted while watching airplanes take off and land, thus not watching our children playing or residents walking or biking down Carl Street?
- 20. How was a 2-day traffic study on Carl Street "valid" both in methodology and analysis assuring "statistical significance levels?"
- 21. When is the Planning & Zoning commission conducting a hearing and vote on changing the Robinson property zoning from agricultural to residential?

Please acknowledge that this letter is received in its entirety and entered into the record. Please provide a timeline in which we can expect a response to our questions.

Regards,

Carl Street Families, Lino Lakes residents

From:	Katie Larsen
То:	Keara Fehr; Alison Harwood
Subject:	FW: Robinson Sod Farm project
Date:	Monday, September 12, 2022 4:25:12 PM

From: Ann Rudie <lukerudie@gmail.com>
Sent: Monday, September 12, 2022 4:03 PM
To: Katie Larsen <KLarsen@linolakes.us>
Subject: Robinson Sod Farm project

**Caution:** This email originated outside our organization; please use caution.

I live in the Century Farm development and have concerns about the safety of the young children in my neighborhood with Robinson becoming a thru street to the new development.

The quiet surroundings and variety of wildlife make this a great place to live. This will certainly change with this massive project.

What has the city done to study the impact of this increase in traffic?

How will the city address the ongoing water quality problem with a project of this size and will new residents be made aware of the manganese issue?

Lexington Cove, Nature's Refuge, Oakwood Ponds and the townhomes near the Kwik Trip on Lexington south of County 14 are all new. Is there a demonstrated need for more housing? I'm opposed to this project because of the traffic volume increase. Ann Rudie

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Caution:** This email originated outside our organization; please use caution.

Doug and Cindy Hansen 296 Carl Street Lino Lakes, MN 55014

September 12, 2022

Katie Larsen City of Lino Lakes 600 Town Center Parkway Lino Lakes, MN 55014

Dear Ms. Larsen,

Please accept this as public comment in response to the Environmental Assessment Worksheet for the proposed Robinson Sod Farm development.

In review, the proposal is for approximately 700 municipal sewer and water systems in this development. In Lino Lakes, we already are prohibited from watering 6:00 am to 6:00 pm - 365 days a year and even tighter restrictions are in place from May through September. Just recently, the DNR gave notice to the City requesting that Lino Lakes implement a total irrigation ban. Due to high levels of manganese found in its wells, Lino Lakes was forced to shut one down and operate two wells at a lower pumping rate to service our city. With the Robinson Sod Farm development, over 700 units will be added to this already stressed system.

We would like assurance that the City of Lino Lakes and Council have a prudent approach including an aggressive water management plan that can handle this addition. We were shocked to discover that Lino Lakes, as a city of this size, is just in the preliminary phase of a water treatment plant.

The City of Blaine is experiencing the results of rapid development, dealing with well interference and may incurred the cost of replacing well pumps and/or drilling new wells in Blaine and Ham Lake for private well owners. We would hate to see the same outcome for the Lino Lakes taxpayers.

Another Environmental Impact that must be considered is the nature path that is used daily not only by Carl Street residents but, also residents from surrounding developments. Carl Street has been a main walking and bike path for decades for people of all ages along with their pets. It is a safe zone since it is not a main thoroughfare and traffic is limited. The alternative is Lilac Street which does not have a continuous sidewalk or a bike path. Children have to ride their bikes with traffic - which is posted at 50 mph - to cross from one development to another. With the Robinson development, there is the proposed access to Carl Street and in one plan the distruction of two well established cul-de-sacs on Carl Street and making it a main thoroughfare. In developments where the City of Lino Lakes has planned for a road to be continued, they have posted signs to indicate their intent. This has not been the case on the two Carl Street cul-de-sacs. The only posted signage was put up only a few years ago with concerns of pet waste and prohibiting motorized vehicles.

People are not the only ones using the Carl Street walking path. Two sets of Sandhill Cranes literally walk side by side down the middle of Carl Street and continue on the path while a pair of Bald Eagles watch from our Cottonwood tree. Endangered Monarch butterflies, bees, and hummingbirds have been thriving in my gardens and down the path as they have pollinated this area spreading milkweed, bee balm and their other favorites. Hawks circle above hunting the inhabitants of the area between the two cul-de-sacs and overflow pond. The five deer that surrounded our car on Christmas Eve surprised us all!

The residents of Carl Street are aware of these activities and drive accordingly and very cautiously. If Carl Street is connected with the Robinson development or is forced to have two cul-de-sacs removed and the street connected, this path will be destroyed and traffic, including heavy trucks, will be going 50 mph endangering all living things. It has been proven that even if posted 30 mph, vehicles will be going closer to 50 mph as in the other cases in Lino Lakes. If the City forces the connection of the Robinson development with Carl Street, we can only pray that a child riding a bike or a vehicle driver will not be distracted or looking at a plane instead of watching where they are going and there is a fatality.

It is our understanding that there was only a 2 day study of Carl Street. This neighborhood has data for for over 30 years. As Anoka County and the City of Lino Lakes are aware, this is a designated Air Park.

This is a serious safety and environmental concern. If Carl Street access is granted, it will have a detrimental impact on the existing surrounding residential developments. As it is now, it is a nature walk. Three neighbors each mow three different areas including the path and the North side of Carl Street. We planted 5- 5 foot pine trees on the south side of the path to add to the aesthetics of this nature walkway 9 years ago. Prior to purchasing our property in 2013, the City Engineer told us that the City of Lino Lakes had no intentions of connecting any future residential development from the sod farm to Carl Street. He said that the intent was to come out directly to 4<sup>th</sup> as the 2010 posted plan showed.

We continue to maintain this path without any reimbursement from the City of Lino Lakes or Anoka County. We do it for our community. We do it for those who also live outside of our Carl Street development to enjoy as they use this walking path daily. This is an "Environmental Impact" that is immeasurable and will be taken away from all if Carl Street is used as any type of access for the Robinson Sod Farm development.

Acknowledgement of receiving this email would be appreciated.

Sincerely,

Doug and Cindy Hansen

September 12, 2022

Steven L Anderson 7795 Clydesdale Circle Lino Lakes, MN 55014

Re: Robinson Sod Farm EAW

To Whom It May Concern;

As a local resident who has witnessed the consequences of the overstressed drainage system in the area (flooded yards and buildings, neighbor conflicts, expensive private drainage systems, etc) I can attest to the fragility of this area in regards to development. The Carlos Avery and its fragile and complex water system is close by, and our local ditch system was designed many years ago to allow development on a limited scale. The drainage restructuring required for this housing proposal with many buildings, paved streets, driveways, patios, etc will negatively impact local residents and their properties. Without the water retention of the sod farm and the increased runoff and potential for flooding, the project could conceivably change the flood status of the area, and threaten existing homes, buildings and properties that were built decades ago.

My second objection, but by no means the lesser, is the environmental impact. The sod farm and the surrounding wetlands and ditches are major nesting/rearing grounds for many species of migratory and local waterfowl, songbirds, deer and predators from raptors to coyotes. The area has been a resting spot for migrating trumpeter and tundra swans, terns, bitterns and more. The Audubon Society's IBA (Important Bird Area) map of Carlos Avery includes the sod farm and the entire Rice Creek Chain of Lakes as one of the most important bird sanctuaries in the midwest. I also argue that our local treasures, Rice Creek and the chain of lakes would be irreparably damaged by the increased herbicide, pesticide, and salt runoff from the new development. Not only the quality of life of animals, but of the existing human residents will be compromised. I strongly recommend that the sod farm become an extension of the Carlos Avery, or some other special green space or park, which are sorely lacking and being diminished at a rapid pace in Anoka county.

Lastly there is the traffic problem that has developed in recent years, and the one that will evolve from the proposed project; from quiet neighborhoods our community streets have been turned into high-speed thoroughfares too dangerous to allow bicycles and pedestrians. Other than condemning property, removing sidewalks and widening these streets, there is no remedy with the existing situation: never mind with hundreds more housing units on the way.

After careful thought and discussion, I remain deeply opposed to the proposed housing development on the sod farm. Please consider utilizing this property as an investment in our future, and keep it a community green space for all of us.

Thank you,

Steven L Anderson

Scott Zbikowski 7765 Clydesdale Circle Lino Lakes, MN 55014

Re: Robinson Sod Farm EAW

To Whom It May Concern;

I am located approximately one half block south of the proposed Robinson Sod Farm Development. I have three main concerns over the proposed development as follows:

1. The impact of the deletion of natural drainage/absorption into the soil. Being that the proposed development has a relatively low elevation with poor drainage. There is great concern that drainage ditch ACD 10-22-32 will be greatly stressed. The Anoka County Rice Creek Water Shed area, ditch ACD 10-22-32, including the proposed Robinson Sod Farm Development is over 100 years old. It was not designed for high density housing. The square feet of housing, driveways, streets and sidewalks greatly effects the natural absorption of natural rainfall.

2. Additional traffic impact. The addition of 707 housing units using two automobiles per household making only one trip per day adds a minimum of 2,828 (2 vehicles x 707 x out going trip x incoming trip) vehicle movements per day onto our existing roadway system. Departing to the north onto County Road 14 (Main Street) is a two lane road with no sidewalks. Assuming that the majority of the traffic will be heading south each day from the development toward the cities, the main roads to be used to exit the area will be County Rd 53, (Sunset Road), or 4<sup>th</sup> Street. Both roads are two lane roads with **no sidewalks**. This is a great safety concern for our area. Departing south (on the west side of development) on County Road 53 routes all the traffic through the already busy single lane rounabout to 109<sup>th</sup> to Lexington to 35W. South (on the east side) routes the traffic onto 4<sup>th</sup> street to CR 153 (Lilac St) to Apollo Drive to Lake Drive to 35W. Three of these roads are to be improved prior to the proposed Robinson Sod Farm Development.

3. I am a member of the Lino Lakes Airpark Association located approximately 1 block to the south of the proposed development. The airpark has been here since the 1950's. It was improved in the late 70's and again improved in 2005/2006. It is an active runway in what was and is in a rural area. Carl Street and ditch ACD 10-22-32 has served as a low density boundary on the north side of our airpark. There must be no access from the development onto Carl Street. Carl Street has two dead ends and must remain that way to minimize traffic next to the airpark. No connection to Carl Street and no connection of east to west dead ends of Carl Street. This is a must for safety concerns of our airpark.

**Please take into consideration the above drainage and safety concerns of the existing area.** Thank you, Scott Zbikowski

From:	Katie Larsen
To:	Keara Fehr; Alison Harwood
Cc:	Michael Grochala
Subject:	FW: EAW Sod Farm
Date:	Wednesday, September 14, 2022 4:53:39 PM
Attachments:	Final-EAW Robinson-Sod-Farm 892022.pdf

From: Lisa Olsen <olsenlisa@comcast.net>
Sent: Wednesday, September 14, 2022 4:48 PM
To: Katie Larsen <KLarsen@linolakes.us>
Subject: EAW Sod Farm

**Caution:** This email originated outside our organization; please use caution.

Dear Katie,

I've made some comments on the EAW that I am attaching. Also, I wanted you to please add Ernie and Lisa Olsen to the signatures that were sent previously by the residents of Carl Street. We were a little late in responding to them so our names didn't get added to the list.

We feel strongly that extending Carl Street will absolutely destroy our existing neighborhood and does not seem like a responsible thing for the city to do to the residents currently living here. We currently get about 2 or 3 cars a day on our end of Carl Street – imagine going to 2500 trips per day. This road means a lot to the people living here as well as residents on the other side of 4<sup>th</sup> Avenue who walk here daily with their children and pets. Also, there's an abundance of wildlife that crosses the road. Please don't destroy our neighborhood.

We are also concerned about our wells and mound system being destroyed. This is a mostly retired neighborhood and we can't afford the cost if our wells and mounds are ruined. Please take extra

caution in this.

Again, please don't extend Carl Street.

Respectfully, Lisa and Ernest Olsen 306 Carl Street

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

## 4. Reason for EAW Preparation: (Check One)

Required	Discretionary
EIS Scoping	□Citizen petition
図Mandatory EAW	□RGU discretion
	□Proposer initiated

If EAW or EIS is mandatory give EQB rule category subpart number(s) and name(s): 4410.4300 Subp 19. Residential Development

### 5. Project Location

County:	Anoka	
City/Township:	Lino Lakes	
PLS Location (¼, ¼, Section, Township, Range):	NE ¼ and NW ¼ of the NW ¼ of Section 7, Township 31, Range 22; NW ¼ and SW ¼ of the NE ¼ of Section 7, Township 31, Range 22	
Watershed (81 major watershed scale):	Mississippi River – Twin Cities	
GPS Coordinates:	Approximately 45° 11' 39.82"N, 93° 07' 57.33"W	
Property ID:	07-31-22-22-0001, 07-31-22-21-0001, 07-31-22-12-0001, 07-31-22-13-0001, 07-31-22-22-0002	

## 6. Project Description

a. Provide the brief project summary to be published in the EQB Monitor, (approximately 50 words).

The Robinson project is a proposed low, medium, and high density residential development on an existing 158-acre agricultural area in the City of Lino Lakes, Anoka County, Minnesota. wo site plan alternatives have been developed for the project:

- PUD Concept Plan The PUD concept plan is expected to consist of 557 dwelling units of the following types:
  - 242 single family detached homes
  - o 315 townhomes
- Yield Plan The yield plan, considered close to the maximum density allowed under future year 2040 land use plans, is expected to consist of 707 dwelling units of the following types:
  - 263 single family detached homes
  - o 164 townhomes
  - o **580 multi-family units**

See Appendix A, Figures 2 and 3 for the PUD concept plan and yield plan.

# Summary of Comments on Title

Page: 5
Number: 1 Author:         Date: Indeterminate
Image: Second
Number: 3 Author: Subject: Highlight Date: Indeterminate
Number: 4 Author: Date: Indeterminate This many multi-family units will make this area into a high crime zone. Please don't do this!
Image: Source         Date: Indeterminate

The project is located to the southeast of Sunset Avenue and 125<sup>th</sup> Ave NE (Main Street, CSAH 14). The project will include new roads, stormwater features, and the installation of municipal sewer and water systems (Appendix A, Figure 1).

b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion include a description of the existing facility. Emphasize: 1) construction, operation methods and features that will cause physical manipulation of the environment or will produce wastes, 2) modifications to existing equipment or industrial processes, 3) significant demolition, removal or remodeling of existing structures, and 4) timing and duration of construction activities.

The proposed project includes the construction of a new single-family and multi-family residential housing development. This includes a range in units from the PUD concept plan of 557 units to the Yield plan of 707 units which are made up of single-family lots (55', 65', and 75' wide), row townhomes, rowhomes, and structured multi-family housing that will be associated with public access roads and private driveways. The proposed unit count on the site falls within the density range for the property provided in the City of Lino Lakes 2040 Comprehensive Plan.

The project site is comprised of five parcels which are summarized below (Table 1).

Parcel ID	Parcel Size (Acres)	Current Use	Project Details
07-31-22-22-0001	37.51	Agriculture	No existing infrastructure
07-31-22-21-0001	39.84	Agriculture	No existing infrastructure
07-31-22-12-0001	39.79	Agriculture	Existing farmstead to be removed
07-31-22-13-0001	39.91	Agriculture	No existing infrastructure
07-31-22-22-0002	1.44	Residential	Existing residence to remain

#### Table 1. Parcels within the Project Site for Residential Development

Roadway access into the development will occur through Main Street and Sunset Ave as dictated by Anoka County. Other roadway access points have been provided to the property through the Century Farm development to the south at Cardinal Way, Robinson Drive, Century Trail, and Darl Street. Additionally, a pedestrian trail has been stubbed to the property from Century Farm Addition to the south, just west of the Cardinal Way Street connection to encourage recreational use. Please don't make Carl Street into an access point. This will absolutely destroy our neighborhood. This is currently The development will create substantial stormwater basin areas that will be an amenity to the various housing types proposed within the project. The main Anoka County ditch system (ACD-10-22-23 Main Trunk and Br2) will be preserved and protected while the newly created stormwater basins will provide for stormwater management goals and infrastructure improvements.

The entire site will be mass graded in one phase to allow for the creation of the stormwater basins. Development of the neighborhood clusters with utilities and streets will be completed in multiple phases based on market demand. The developer will be responsible for site grading, utilities, sanitary sewer, water supply, roadway infrastructure, stormwater, and erosion control. Management of the site will fall to the individual owners and homeowner's association once construction is completed on site.

Number: 1 Author:	Date: Indeterminate	
Number: 2 Author: Please don't make	Date: Indeterminate	
Number: 3 Author:	Date: Indeterminate	
Carl Street into an access point. This will absolutely destroy our neighborhood. This is currently a rural road.		
Number: 4 Author:	Date: Indeterminate	

This is going to destroy the water table and impact our well and mound systems.

Mass grading is anticipated to begin winter 2023 with the first phase of utilities and streets completed by July 2023. Home construction is anticipated to begin July 2023 with a full build out of the community taking place over four to five years depending on market conditions.

#### c. Project magnitude:

#### Table 2a. Project Magnitude Data – PUD Concept Plan (557 Units)

Total Project Acreage	158 acres
Linear project length	16,000 linear feet public roadway 6,800 linear feet private roadway
Number and type of residential units: PUD Concept Plan	45 75-feet wide Single Family Lots 117 65-feet wide Single Family Lots 80 55-feet wide Single Family Lots 191 Row Townhomes 224 Back-to-back & Row Townhomes 557 total residential units
Commercial building area (in square feet)	N/A
Industrial building area (in square feet)	N/A
Institutional building area (in square feet)	N/A
Other uses – specify (in square feet)	Stormwater ponds: 840,708 Lake: 270,072
Structure height(s)	Back-to-back townhomes will be three stories tall
3 story structures are going to make our one or on and a half story homes look bad.	e (25) tories above a garage A Row townhomes will be two or three stories tall. Utructured multi family housing will be two stories tall. Single Family Homes will be one or two stories tall.

#### Table 3b. Project Magnitude Data – Yield Plan (707 Units)

Total Project Acreage	158 acres	
Linear project length	13,600 linear feet public roadway 14,700 linear feet private roadway	
Number and type of residential units: Yield Plan	148 80-feet wide Single Family Lots 286 Row Townhomes 172 Back-to-back & Row Townhomes <u>1 Existing Home on New Lot</u> 707 total residential units	
Commercial building area (in square feet)	N/A	
Industrial building area (in square feet)	N/A	
Institutional building area (in square feet)	N/A	
Other uses – specify (in square feet)	Stormwater ponds: 932,184	
Structure height(s)	Back-to-back townhomes will be three stories tall (2 stories above a garage). Row townhomes will be two or three stories tall. Dtructured multi family housing will be two stories tall.	

Number: 1 Author:	Date: Indeterminate
Number: 2 Author:	Date: Indeterminate
Number: 3 Author:	Date: Indeterminate
Number: 4 Author:	Date: Indeterminate
Number: 5 Author:	Date: Indeterminate going to make our one or one
3 story structures are and a half story home	e going to make our one or one
Number: 6 Author:	Date: Indeterminate
Number: 7 Author:	Date: Indeterminate
Number: 8 Author:	Date: Indeterminate
Number: 9 Author:	Date: Indeterminate
N10.4 .4	
Number: 10 Author:	Date: Indeterminate ioned above in type of
	vnhomes are bad enough;
don't add multi-family	housing to this
neighborhood.	
Number: 11 Author:	Date: Indeterminate
-	
Number: 12 Author:	Date: Indeterminate



*d.* Explain the project purpose; if the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

The purpose of the proposed project is to develop a residential neighborhood in the City of Lino Lakes. Based on the City of Lino Lakes' 2040 Comprehensive Plan, the City has designated this area of the community for future residential growth to meet the projected housing demands of current and future residents. It is the intent of the developer to create a low density, medium, and high residential neighborhood that contributes to the city's housing goals and objectives.

e. Are future stages of this development including development on any other property planned or likely to happen? □Yes ☑No

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

There are no future stages of this development that are planned or likely to occur.

f. Is this project a subsequent stage of an earlier project? □Yes ⊠No

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

The project is not a subsequent stage of an earlier project.

### 7. Cover Types

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

Land Cover Type	Before (acres)	After (acres) – Yield Plan
Cropland	130	0
Residential	0	74
Grassland	1	2
Stormwater basin	0	21
Wooded/forested	0	0
3Vetlands <sup>1</sup>	<mark>46</mark>	<u>s</u>
Lawn/Landscaping <sup>2</sup>	2	34
Facility Operation	3	0
Road Right-of-Way	6	20
Public Trail	0	1
TOTAL	158	158
<sup>1</sup> Wetlands are calculated from the National Wetl	and Inventory (NWI). R wetland delineation has n	ot been conducted on site yet. The mappe

<sup>10</sup> NWI features overlap with the private and public drainage features present on site. Wildlife preserve should be considered <sup>10</sup> <sup>2</sup> The lawn/landscaping acreage after development does not reflect the lawn associated with each residential home. This is included in the residential cover type

See Appendix A, Figures 4 and 5 for a graphic representation of this data.

Number: 1 Author:	Date: Indeterminate
Number: 2 Author:	Date: Indeterminate
	Date: Indeterminate
Number: 3 Author:	
Number: 4 Author:	Date: Indeterminate
<u>INumber: 5</u> Author:	Date: Indeterminate
Number: 6 Author:	Subject: Highlight Date: Indeterminate
Number: 7 Author:	Date: Indeterminate
Number: 8 Author:	Date: Indeterminate
Tamber & Addior.	
<u>Number: 9</u> Author:	Date: Indeterminate
Number: 10 Author:	Date: Indeterminate

Wildlife preserve should be considered

## 9. Land Use

#### a. Describe:

*i.* Existing land use of the site as well as areas adjacent to and near the site, including parks, trails, prime or unique farmlands.

The existing land use on site is sod farm agriculture. Anoka County Ditch 10-22-32's main trunk and branch 2 run through the site. The site is surrounded by agriculture, rural residential, single-family residential, multi-family residential, and undeveloped land.

The closest parks to the project include:

- Parks less than 1 mile from the project site include:
  - o Pentury Farm North Park (undeveloped): 500 feet to the south Will this be developed? 1
  - Behm's Park: 2000 feet to the south
  - Highland Meadows Park: 0.5 mile to the east
  - Parks within approximately 1 mile of the project include:
    - o Blaine's Lochness Park: southwest
    - o Blaine Wetland Sanctuary: southwest
    - o Lino Park: east
    - o Rice Creek Chain of Lakes Regional Park Reserve: southeast
    - o Blaine Lexington Athletic Complex: southwest

There is a city trail that stubs into the south end of the property.

The majority of the site is not considered prime farmland or soils of statewide importance based on the USDA NRCS Web Soil Survey. Further discussion about soils within the project site is provided in Item 10.

*ii.* Plans. Describe planned land use as identified in comprehensive plan (if available) and any other applicable plan for land use, water, or resources management by a local, regional, state, or federal agency.

The site is split up into four planned land uses based on the City of Lino Lake's 2040 Comprehensive Plan. The planned land use for the west and south ends of the site is Low Density Residential (1.6 - 3.0 units per acre). The planned land use for the central and northern end of the project is a mix of Medium Density Residential (4.0 - 6.0 units per acre), High Density Residential (6.0 - 8.0 units per acre), and Planned Residential / Commercial (8.0 - 10.0 units per acre) with opportunities for neighborhood scale retail, service, and office uses (Appendix A, Figure 6; City of Lino Lakes, 2020).

The site is required to meet the requirements of the surface water management plans of the City of Lino Lakes, Rice Creek Watershed District, and the MPCA NPDES General Permit. Stormwater basins are incorporated throughout the development.

what assurance do we have that our wells and mound systems won't be affected? 3

Number: 1 Author: E Will this be developed? Date: Indeterminate

<u>Number: 2</u> Author: Date: Indeterminate

Number: 3 Author: Date: Indeterminate what assurance do we have that our wells and mound systems won't be affected?



2

The National Hydrography Map (NHD) identifies ditches throughout the property that correspond with the NWI riverine features identified on site and the Anoka County ditch.

The Minnesota Pollution Control Agency (MPCA) Impaired Waters Map does not identify any impaired waterways or basins within the project site and within 1 mile of the project site.

ii. Groundwater – aquifers, springs, seeps. Include: 1) depth to groundwater; 2) if project is within a MDH wellhead protection area; 3) identification of any onsite and/or nearby wells, including unique numbers and well logs if available. If there are no wells known on site or nearby, explain the methodology used to determine this.

Groundwater levels vary across the site. In the soil boring testing locations, groundwater ranged from approximately 5 to 10 feet below the soil surface. However, it should be noted that the observation periods for the borings were relatively short, and project planning can expect groundwater levels to fluctuate based on seasonal and annual factors such as flooding, irrigation, precipitation, freeze/thaw, and surface drainage modifications.

Based on the MN DNR Minnesota Spring Inventory, there are no springs or seeps located within the project site.

The project site is not located within a MDH wellhead protection area. The project site is within 0.5 mile of the Minnesota correctional facility – Lino Lakes drinking water supply management area (DWSMA) and within approximately 1.5 mile of the City of Blaine's (East) DWSMA.

There are two wells located on site. Their unique well numbers are 231862 and 444819 (Appendix A, Figure 11; Appendix B). See Table 6 below for more information on the wells. On site wells will be sealed in accordance with MDH requirements.

Well No.	Surface Elevation (ft)	Use	Depth (ft)	Cased Depth (ft)	Depth to Static Water Level (ft)	Aquifer	Within Project Site?
231862	900	N/A	720	196	N/A	Multiple	Yes
444819	899	Domestic	200	185	45	Jordan	Yes
* Data wa	* Data was taken from the MDH's Well Index (https://mnwellindex.web.health.state.mn.us/)						

#### Table 7. Water Wells Located Within the Project Site

- b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects in Item b.i. through Item b.iv. below.
  - *i.* Wastewater For each of the following, describe the sources, quantities and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site.
    - 1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

Number: 1 Author: Date: Indeterminate

Number: 2 Author: Date: Indeterminate Nearby wells on Carl Street are not mentioned, but are definitely present and in jeopardy. Lino Lakes residential water demand from 2016 to 2020 was 65 gallons per person per day of water. Based on a three person household, it is estimated that the PUD Concept Plan will use approximately 108,615 gallons per day of water and the Yield Plan will use approximately 137,865 gallons per day of water.

Measures to avoid, minimize, or mitigate environmental effects of groundwater consumption include many approaches that will result in a reduction of overall water demand. These include utilization of smart irrigation technology, water conservation, water use efficiency improvements, limitations on irrigation, stormwater reuse for irrigation, low water use landscaping, and use of low flow fixtures.

#### iv. Surface Waters

 Wetlands - Describe any anticipated physical effects or alterations to wetland features such as draining, filling, permanent inundation, dredging and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed, and identify those probable locations.

An on-site field wetland delineation has not been completed at this time, but will occur during the summer of 2022.

Any wetlands identified within the project site are regulated at the state level by the Wetland Conservation Act (WCA) which is administered by the Minnesota Board of Water and Soil Resources (BWSR). Rice Creek Watershed District is the WCA Local Government Unit (LGU) where the project site is located. At the federal level, wetlands are regulated under Section 401/404 of the Federal Clean Water Act (CWA) that is administered by the MPCA (Section 401 Certification) and the U.S. Army Corps of Engineers (Section 404 Permit). There are no MN DNR public waters, public water wetlands, or public watercourses within the project. Thus, an MN DNR public waters permit will not be necessary for this project site.

#### Potential Impacts to Wetlands on Site

Based on the potential PUD and yield concept plans, it is possible that permanent wetland fill could occur on site. The permanent wetland fill could potentially be eight acres in size; however, this estimate is only based on desktop mapping from the Minnesota National Wetland Inventory and is subject to change based on the wetland delineation that is still in progress and needs to be approved. Based on the results of the field wetland delineation, the concept plan may need to be altered to avoid and minimize wetland impact where feasible.

An Approved Jurisdictional Determination (AJD) will likely be obtained, if necessary, from the Army Corps of Engineers once the delineation is finalized and impacts are known on site.

The sod farm currently has a lot of wildlife and migratory bird population. This needs to be considered.

Number: 1 Author: Date: Indeterminate The sod farm currently has a lot of wildlife and migratory bird population. This needs to be considered. An asbestos and regulated materials (ARM) assessment will be completed prior to the demolition of the farmstead and an a 10-day demolition notification will be made to the MPCA/MDH if asbestos containing material (ACM) is identified during the ARM assessment. If ACM and/or other regulated solid waste is identified during the ARM assessment requiring removal, generated solid waste will be disposed of at an MPCA permitted landfill.

In addition to the brownfield and tank release identified, there are **10** sites within 0.5 miles of the proposed project site as shown in the MPCA's database (Appendix A, Figure 12; Table 7). Six are construction stormwater permits associated with residential development or drainage improvement, and four are associated with petroleum tanks, hazardous waste, and underground tanks. Information on the MPCA's website indicates that these sites have been properly investigated and managed. Therefore, these sites are not expected to adversely affect the project site.

The Minnesota Department of Agriculture's (MDA) What's in My Neighborhood database indicates that there are a sites within 0.5 miles of the project site.

#### Table 8. What's in My Neighborhood Sites within 0.5 Miles of the Project Site

2

Site ID	Туре	Name	Status	Within Project Site
107252	Aboveground tanks, underground tanks, brownfields*	Robinson Landscaping	Active, Inactive*	Yes
226150	Construction stormwater	Century Farm North 7 <sup>th</sup>	Active	No, within 0.5 miles
157490	Construction stormwater	Morell Borrow Pit	Active	No, within 0.5 miles
212682	Construction stormwater	Century Farm North 6 <sup>th</sup> Addition	Active	No, within 0.5 miles
141380	Construction stormwater	Anoka County Ditch 10-22-32 Maintenance 3	Inactive	No, within 0.5 miles
191075	Petroleum remediation, leak site	Caroll Busch Residence	Inactive	No, within 0.5 miles
107177	Underground tanks	Goldade Richard J	Inactive	No, within 0.5 miles
21238	Hazardous waste generator, minimal quantity, petroleum remediation*, leak site*	A & L Sod Inc	Active, Inactive*	No, within 0.5 miles
224787	Construction stormwater	Level Street NE Improvement project	Inactive	No, within 0.5 miles
228696	Construction stormwater	CSAH 14 from Lexington to Opal Street	Active	No, within 0.5 miles
139362	Hazardous waste	Blaine House Demo	Inactive	No, within 0.5 miles
Source: MPCA's "What's in My Neighborhood" Database https://pca-gis02.pca.state.mn.us/wimn2/index.html				

Number: 1 Author:	Date: Indeterminate		
<u>Number: 2</u> Author:	Subject: Highlight	Date: Indeterminate	
Number: 3 Author:	Date: Indeterminate		

**PAGE 20** 

 Project related generation/storage of hazardous wastes - Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize or mitigate adverse effects from the generation/storage of hazardous waste including source reduction and recycling.

During construction, the project will follow the NPDES permit requirements and city ordinances to avoid and minimize effects from the storage of hazardous waste. Generation of small quantities of household hazardous waste will occur when residents are living on the property. Anoka County provides free recycling and disposal of hazardous wastes at the Household Hazardous Waste Facility located in the nearby city of Blaine.

# 13. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

a. Describe fish and wildlife resources as well as habitats and vegetation on or in near the site.

The habitats and vegetation present on site primarily consist of agriculture. Parcel 1 of the project site also consists of landscaped lawn and mature deciduous trees around the existing residential property.

Based on desktop analysis, there are private and public ditches that run throughout the property. Additionally, there are potentially farmed wetland features present on site. Therefore, there is potential habitat available for fish species on the project site.

Due to the disturbed nature of the project site, common wildlife species adapted to agriculture and suburban environments, such as white-tailed deer, songbirds, and small mammals (squirrels, rabbits, raccoons), are likely to occur within the project site. covote, moles, fox, blue heron, sandhill crane, beaver, muskrats, turtles, falcon, owls, crows, garter snake, veodchucks, turkey, skunk, eagles, turkey vultures

b. Describe rare features such as state-listed (endangered, threatened or special concern) species, native plant communities, Minnesota County Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-\_\_\_\_) and/or correspondence number (ERDB \_\_\_\_\_\_) from which the data were obtained and attach the Natural Heritage letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe the results.

#### <u>State</u>

The MN DNR NHIS database was queried (License agreement # 181676) to determine whether known locations of rare plant, animal species, or other significant natural features are known to occur within an approximate one-mile radius of the project site. A MN DNR NHIS concurrence request letter was sent to the MN DNR to concur with the findings of the NHIS database query. The MN DNR issued their NHIS review letter in May 2022 and their findings are described in Appendix C.

The NHIS review identified eight vegetation species and one reptile species occurring within one mile of the site. There are no state listed species within the project site. These species include:

Number: 1 Author: Date: Indeterminate coyote, moles, fox, blue heron, sandhill crane, beaver, woodchucks, turkey, skunk, eagles, turkey vultures

Number: 2 Author: Date: Indeterminate muskrats, turtles, falcon, owls, crows, garter snake,

## 15. Visual

a. Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

The existing views from the site include agriculture, residential development, wetlands, open field, and forested areas.

This project will not create any unusual visual impacts. The visual effect will transition views from predominately open flat agriculture land to single family homes and townhomes, public access roads, and stormwater basins. The project will not include intense lighting that will cause glare and the residential developments will not produce vapor plumes. The outdoor lighting along the streets will be strategically placed to benefit the residents as they navigate the development and will not direct any light towards sensitive areas. The visual effects from Carl Street will transition from seeing wildlife and having a rural atmosphere to 3 story high buildings, totally devastating the

Landscape plantings will be included find the development per the City of Lino Lakes landscape ordinance. This will include tree and shrubs plantings along portions of the site's perimeter. The landscape plantings will help soften the visual transition between the open space and residential developments adjacent to the site.

#### 16.Air

a. Stationary source emissions - Describe the type, sources, quantities and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants, criteria pollutants, and any greenhouse gases. Discuss effects to air quality including any sensitive receptors, human health or applicable regulatory criteria. Include a discussion of any methods used assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that will be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.

The proposed residential subdivision will generate small sources of stationary source emissions through home heating and cooling through natural gas and electricity. This will result in direct and indirect sources of stationary greenhouse gas emissions (GHG) at a small quantity. Emissions are expected to be similar to those of the single-family and multi-family residential units adjacent to the site.

The Minnesota Environmental Quality Board (EQB) is currently working on a pilot program to understand how to integrate GHG quantification and assessment into the Environmental Review documents. However, the requirements and methods are not required for the document yet. Thus, the GHG for this document will be qualitative.

The primary GHG's are carbon dioxide  $(CO_2)$ , nitrous oxide  $(N_2O)$ , methane  $(CH_4)$ , sulfur hexafluoride  $(SF_6)$ , and two classes of compounds called hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs). Carbon dioxide is the most abundant GHG and has the largest effect on the climate. Emissions are reported as carbon dioxide equivalent (CO2-e) tons and are stated in terms that reflect their global warming potential (GWP) (MPCA, 2021).

1

Number: 1 Author: Date: Indeterminate The visual effects from Carl Street will transition from seeing wildlife and having a rural atmosphere to 3 story high buildings, totally devastating the view

## 17. Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area, 2) nearby sensitive receptors, 3) conformance to state noise standards, and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

The existing noise levels and sources in the area are those typical of residential development and agriculture farming. The nearest noise receptors to the site are single family residential homes and a sod farm. The nearest noise receptors will experience noise levels during construction that are elevated in comparison to existing noise levels. Grading and excavation activities on site will require heavy construction equipment.

Noise levels will temporarily increase during construction of the site then return to existing levels during operation consistent with the zoned residential purpose of the property. Noise levels on site will vary depending on where construction is occurring on site, time of operation, and distance between receptors and construction equipment.

Construction noise can be mitigated by restricting construction work to daytime hours. Contractors will be required to minimize noise impacts by maintaining equipment properly, including noise controls as specified by manufactures. The project will adhere to the City of Lino Lake's noise rules and standards that indicates noise should occur within specified levels depending on land use and time of day.

If Carl Street is extended, noise and traffic levels will be untolerable for current Carl Street residents. <sup>[1]</sup> <sup>[2]</sup>fter construction, noise levels are expected to be at or near existing levels. Noise associated with the project will be related to residential vehicle noise. A combination of berms, landscaping, and fencing will be used to provide noise mitigation for the adjacent residential developments. Similar to construction noise, the residential use of the property will adhere to the City's noise rules and standards. A noise study will be prepared detailing noise mitigation for the site and submitted with the preliminary plat submittal for the development.

## 18. Transportation

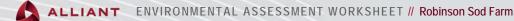
a. Describe traffic-related aspects of project construction and operation. Include: 1) existing and proposed additional parking spaces, 2) estimated total average daily traffic generated, 3) estimated maximum peak hour traffic generated and time of occurrence, 4) indicate source of trip generation rates used in the estimates, and 5) availability of transit and/or other alternative transportation modes.

Alliant completed a Traffic Impact Study for the residential development (See Appendix F). The Traffic Study analyzes the traffic impacts of the proposed development by estimating trips generated by the project and evaluating the potential need for transportation or roadway improvements for the development.

1) The majority of the proposed development site is currently undeveloped agricultural land with no parking spaces, though one business is present with a limited supply of parking. The proposed development will consist of approximately 707 residential dwelling units (149 single-family

3

Number: 3 Author: Date: Indeterminate Traffic noise will be terrible if you extend access to Carl Street.



detached homes and 558 townhomes). Assuming two parking spaces per dwelling unit, the proposed additional parking supply is approximately 1,400 spaces, primarily in the form of attached garages.

2) The proposed development is expected to generate approximately 1,656 daily vehicle trips when fully constructed and occupied. Carl Street currently gets only about 10 vehicle trips per day - 2

3) The proposed development is expected to generate approximately 376 vehicle trips during the daily peak hour when fully constructed and occupied. The daily peak hour is the p.m. peak hour, which is expected to occur at some point within the 4:00-6:00 p.m. timeframe.

4) The Institute of Transportation Engineers Trip Generation Manual, 11th Edition, was used to estimate the trip generation potential for the proposed development.

5) Currently, the project area is not served by scheduled transit routes. Metro Mobility and Transit Link are shared-ride, curb-to-curb minibus or van services which do serve the project area. Weekday express bus service to downtown Minneapolis and the University of Minnesota campus currently originates from the 95th Avenue park-and-ride along I-35W in nearby Blaine. Weekday express bus service is also available to downtown Saint Paul and currently originates from the County Road 14 park-and-ride in eastern Lino Lakes. While these transit services will be available to future residents of the proposed development, they are not expected to have a significant impact on vehicular ingress and egress at the development site.

Connections to sidewalks and trails are available through the adjacent Century Farm North residential neighborhood. Continued growth of the residential sidewalk and trail network will also occur within the proposed development. Trails will be extended through the west and southeast portions of the proposed development as well as along Robinson Drive and Century Trail. A future trail is planned along Main Street.

b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: http://www.dot.state.mn.us/accessmanagement/resources.html) or a similar local guidance.

<sup>4</sup>he anticipated vehicular trip generation for the proposed development exceeds 250 peak hour trips and 2,500 daily trips. Therefore, a traffic impact study was prepared for the proposed development.

- The Robinson Property residential development is proposed to be constructed on approximately 157 acres of agricultural land located in the southeast quadrant of the Main Street/Sunset Avenue intersection in Lino Lakes, MN. The traffic impacts of proposed development trips on surrounding study intersections were analyzed for year 2025 and year 2040 conditions. The following conclusions are offered for consideration:
  - Results of the existing traffic operations analysis indicate that all study intersections currently operate at overall LOS A during the weekday a.m. and p.m. peak hours. In addition, no side-street delay or queuing issues were observed in the field or traffic simulations.

Number: 1 Author:	Date: Indeterminate
Number: 2 Author:	Date: Indeterminate
Carl Street currently	gets only about 10 vehicle trips per day -
this new level would	be intolerable.
— N. J. 2 A.J.	
Number: 3 Author:	Date: Indeterminate
Number: 4 Author:	Date: Indeterminate
Number: 5 Author:	

Please don't include access to Carl Street - it will DESTROY our rural neighborhood. It's impossible to comprehend going from 3 cars a day to 2500 a day.



- Results of the year 2025 and year 2040 no build traffic operations analysis indicate that all study intersections are expected to operate at overall LOS A during the weekday a.m. and p.m. peak hours. In addition, no side-street delay or queuing issues were observed in traffic simulations.
- Results of the year 2025 and year 2040 build traffic operations analysis indicate that all study intersections are expected to operate at overall LOS B or better during the weekday a.m. and p.m. peak hours. In addition, no side-street delay or queuing issues were observed in traffic simulations.
- The proposed development is expected to have limited impact on study area traffic operations or the regional transportation system. Therefore, no geometric or traffic control improvements are required from an operations perspective.

#### There will be a huge impact to Carl Street residents if Carl Street is made accessible. It is currently a dead-end road.

*c.* Identify measures that will be taken to minimize or mitigate project related transportation effects. What measures will be taken for Carl Street?

While roadway improvements are not required from a traffic operations or regional transportation system perspective, the following recommendations should be considered:

- Dedicated eastbound right-turn and westbound left-turn lanes are proposed at the Main Street/North Access (Century Trail) intersection. A dedicated northbound right-turn lane is proposed at the Sunset Avenue/West Access intersection. A dedicated southbound left-turn lane is proposed at the Sunset Avenue/Robinson Drive intersection. While these turn lanes are not required from an operations perspective, they would be expected to provide a safety benefit in minimizing the potential for rear-end crashes.
- Caution should be exercised when placing development signing and/or landscaping near proposed site accesses so as to not create a new sight obstruction.
- Turning movements should be reviewed to ensure design vehicles such as school buses and garbage trucks have adequate accommodations to negotiate internal proposed development roadways.
- Establish appropriate traffic control at proposed development internal roadway intersections consistent with local jurisdiction policies to minimize driver confusion and the potential for conflicts.

See Appendix F for the Traffic Study.

Number: 1 Author:	Date: Indeterminate	
Number: 2 Author:	Date: Indeterminate	
There will be a huge impact to Carl Street residents if Carl Street is made accessible. It is currently a dead-end road.		

Number: 3 Author: Date: Indeterminate What measures will be taken for Carl Street? September 14, 2022

Katie Larsen, City Planner City of Lino Lakes 600 Town Center Pkwy Lino Lakes, MN 55014-1182

#### Dear Ms. Larsen,

We understand there has been an Environmental Assessment Worksheet (EAW) submitted for the Robinson Sod Farm dated August 23, 2022. We are writing to express major concerns about this environmental proposal from a personal property perspective. Our house located at 314 Carl Street is directly across from the proposed development. In 2003, when the previous owners began building the house, they installed a wood foundation which was approved by the Lino Lakes inspector. With a wood foundation, you must be diligent to keep it dry and since 2003, there have been absolutely no issues with the foundation in terms of moisture. Before we purchased the home in 2020, we hired a structural engineer to go over the foundation with a fine tooth comb. He found NO issues which are documented in our survey results, but he could not stress enough the importance of keeping water away from our foundation.

Upon the review of the EAW and our wood foundation, we are bringing forth the following concerns:

- We are concerned that the alteration of 100 plus year drainage complexes in the area will negatively impact the established 100 year floodplain. In other words, right now, the sod farm and surrounding drainage ditches can handle the water drainage and runoff, but with this huge development and the potential rise in the water table, will that continue to be true?
- We are concerned that our wood foundation home will incur water damage which would be detrimental. We understand this has already happened to homes in Blaine with the new development off of Lexington and 109<sup>th</sup>. There are also other homes with wood foundations nearby. Along with moisture in the home comes potential health risks associated with black mold. I am currently a cancer patient and I do not need any additional potential health risks in my life. Has the City of Lino Lakes or Alliant Engineering contacted the Corp of Engineers or the appropriate governing body to determine how the established 100 year floodplain will be impacted by massive water redistribution?

Please acknowledge that this letter is received in its entirety and entered into the record. Please provide a timeline in which we can expect a response to our questions.

Regards,

Kevin and Tammy Dunrud 314 Carl Street Lino Lakes, MN 55014 September 15, 2022

Reilly S Anderson 7795 Clydesdale Circle Lino Lakes, MN 55014

Re: Robinson Sod Farm Development

To Whom It May Concern;

I am writing to express my concern and opposition to the proposed Robinson Sod Farm Development. As a local resident, I cherish the green spaces and wildlife the local area has to offer. I frequently see migratory waterfowl, turtles, and predatory birds that use the sod farm as a habitat corridor and nesting area. In fact, the sod farm is included in the Audobon Society's Important Bird Map, and currently acts as additional sanctuary for wildlife outside of Carlos Avery Wildlife Management Area. Going forward with the proposed housing development threatens to further fragment the habitats of birds and other wildlife within Anoka county, and will add new stressors to the local environment. As summer weather becomes increasingly extreme and unpredictable, newly constructed impervious surfaces will further stress the local aging drainage systems, threatening the homes and properties of existing area residents with flooding, many of which were built many years ago.

Furthermore, the already out-of-control issue of high volume, high speed local traffic raises major concerns as to how traffic will be managed in the area. This relatively quiet part of Lino Lakes is already turning into a more hazardous and congested area, with commuters racing through the neighborhoods. The proposed new roads and feeder routes will be ineffective in mitigating this problem. In recent years, the neighborhood has become dangerous for bicyclists and pedestrians- a simple trip to the mailbox is treacherous. The addition of this proposed high density housing will add a critical amount of new motor traffic that will exceed the local infrastructure's ability to provide safe streets.

After review of the EAW and careful discussion with others in the neighborhood, I am opposed to the proposed development and believe that preserving the farm is in the best interest of the city, its residents and the local environment. Please consider the needs of current residents near the Robinson Sod Farm and oppose this development which will serve to benefit big money investors and realtors, instead of our families and environment.

Sincerely,

**Reilly Anderson** 

# Appendix B

CITY OF LINO LAKES RESOLUTION FINDING OF NO NEED FOR EIS