

FINDINGS OF FACT and RECORD OF DECISION

FOR THE

LINWOOD SCHOOL ENVIRONMENTAL ASSESSMENT WORKSHEET

SAINT PAUL, MINNESOTA

February 2, 2017

RGU

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PROPOSER

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FINDINGS OF FACT

1. Project Description:

St. Paul Public Schools is proposing partial demolition, renovation, and construction of an addition on Linwood School at 1023 Osceola Avenue in Saint Paul, MN. The demolition will remove approximately 5,375 square feet of existing building. Approximately 38,972 square feet of floor space will be added to the building. The stated intent of the project is to address overcrowding and update the school to current educational standards.

2. Environmental Assessment Worksheet Preparation and Distribution:

An Environmental Assessment Worksheet (EAW) is required by Minnesota Rules 4410.4300, Subp. 31, which specifies that an EAW must be completed prior to the partial demolition of a property contributing to a State Register Historic District. Linwood School is located in and contributing to the State Register Historic Hill District. The City of Saint Paul is the Responsible Governmental Unit (RGU) for the environmental review process for the Linwood School project. An EAW has been prepared for the proposed project in accordance with the Environmental Review Program of the Minnesota Environmental Quality Board (MEQB) and is herein incorporated by reference.

The EAW was filed with the MEQB on October 3, 2017 and circulated for review and comment to all parties on the Minnesota Environmental Review Program distribution list on October 6,

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2017. A Notice of Availability of the EAW was published in the EQB Monitor and posted on the Saint Paul Early Notification System on October 10, 2016. The thirty-day public comment period ended November 9, 2016. All comments received were considered in determining the potential for significant environmental impacts as a result of the proposed project. Written comments received on the proposed project are shown in a separate Responses to Comments, attached to this Finding of Fact and Record of Decision as **Attachment A**. The Responses to Comments and is hereby provided to all individuals and entities on the MEQB distribution list or who submitted comments on the EAW. Distribution of all documents is via email, except to those agencies listed on the MEQB distribution list as receiving hardcopy documents. Documents are also available for download from the City's website at stpaul.gov/linwoodschool EAW, and additional hardcopies are available upon request.

3. Minnesota Rules 4410.1700 Subp. 7 described the following criteria for determining the need for an Environmental Impact Statement (EIS):
 - A. Type, Extent, and Reversibility of Environmental Effects:
Minnesota Rules 4410.1700 Subp. 7 (A) states that the RGU must consider the "type, extent, and reversibility of environmental effects." This criterion is addressed in Findings 4, 5, and 6, below.
 - B. Cumulative Potential Effects:
Minnesota Rules 4410.1700 Subp. 7 (B) states that the RGU must consider "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." The City's findings are set forth below. This criterion is addressed in Finding 7 below.
 - C. Extent to Which the Environmental Effects are Subject to Mitigation:
Minnesota Rules 4410.1700 Subp. 7 (C) states that the RGU must consider the "extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority." This criterion is addressed in Finding 8, below.
 - D. Extent to Which Environmental Effects can be Anticipated and Controlled:
Minnesota Rules 4410.1700 Subp. 7 (D) states that the RGU must consider 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". This criterion is addressed in Finding 8, below.
4. Linwood School is considered contributing to the Historic Hill District, and therefore the proposed demolition of historic portions of the building constitutes an adverse impact to the building itself, and by extension to the Historic Hill District. While not reversible, the impact is limited in scope, and the project will preserve majority of the historic structure, including the primary façade, will not result in the loss of historic integrity of the structure or district, and will be perceptible only from within direct line-of-sight of the proposed project site.

5. On December 14, 2016, Saint Paul Public Schools staff and their agents meet with staff of the Minnesota State Historic Preservation Office (MnHPO) to initiate consultation with MnHPO pursuant to Minnesota Statute 138.665, which requires that subdivisions of state government to consult with MnHPO prior to undertaking a project which affect properties listed on the State or National Registers of Historic Places in order to identify ways to avoid or minimize impacts. In a letter dated On January 13, 2107, MnHPO recommended that a *Minnesota Architecture-History Form* be completed and archival 35mm photographic documentation of the Linwood School be created prior to any demolition work. MnHPO further stated that Based upon design revisions to the proposed addition to Linwood School provided by agents of the Saint Paul Public Schools on January 10, 2017 MnHPO has concluded that the overall design of the addition is now consistent with the Secretary of the Interior's *Standards for Rehabilitation* and would therefore not result in further adverse impact to the Historic Hill District.
6. While the proposed partial demolition of the Linwood School will result in permanent loss of portions of the historic building, the nature and extent of the impacts is limited. Completion of a *Minnesota Architecture-History Form* and creation of archival 35mm photographic documentation of the Linwood School prior to any demolition, and 2) construction of an addition consistent in compliance with the design revisions provided to MnHPO on January 10, 2017 will provide sufficient mitigation for the loss of portions of the historic structure and will minimize the overall impact of the project to historic resources.
7. The proposed project will not result in cumulative environmental impacts. The proposed partial demolition of and addition to Linwood School is a discreet project, is not part of a phased or connected action, and will not induce other projects. The proposed project will not result in cumulative environmental impacts. Any future projects involving demolition of properties within the Historic Hill District will be subject to environmental review under Minnesota State law and rule.
8. Anticipated project-specific environmental effects have been evaluated as part of preparation of the EAW, and recommendations for mitigation of impacts to historic resources have been made. The proposed project will be subject to standard permitting reviews, including a site plan review and a review of variances from zoning standards regarding building height and setbacks. A traffic study documenting existing conditions and operations plans, signage, and other such items as deemed appropriate by City of Saint Paul staff shall be reviewed and approved as a condition of site plan approval for the project. The information gathered through the Linwood School EAW will be included in the public record for those reviews. Any approval resulting from the reviews noted above shall require the mitigation measures identified herein as conditions of approval.

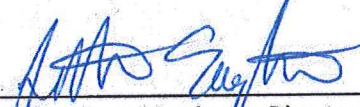
RECORD OF DECISION

Based on the EAW, comments received during the public comment period ending November 9, 2016, the January 15, 2017 communication from the Minnesota Historic Preservation Office, the Responses to Comments, and Findings of Fact, the RGU City of Saint Paul, as the RGU for this environmental review, hereby concludes the following:

1. The City of Saint Paul has fulfilled all applicable procedural requirements for determining the

adequacy of the Linwood School EAW and the need for an Environmental Impact Statement for the proposed partial demolition of Linwood School.

2. Pursuant to Minnesota Rules Part 4410.1700, Subpart 5, a copy of this RGU Record of Decision is being provided, within 5 days, to all persons on the MEQB distribution list, to persons and entities commenting, and to persons who requested a copy. This Record of Decision will also be made available on the City of Saint Paul's website.
3. Pursuant to Minnesota Rules Part 4410.1700, Subparts 6 and 7, the proposed project has been evaluated by the public and the City of Saint Paul to determine potential environmental effects. Based on the findings and record in this matter, the City of Saint Paul has determined that the proposed Linwood School project does not have the potential for significant environmental effects.
4. The City of Saint Paul, acting as the Responsible Governmental Unit, makes a negative declaration. The proposed project does not require the preparation of an environmental impact statement.



Jonathan Sage-Martinson, Director,
City of Saint Paul, Planning and
Economic Development

February 2, 2017
Date