

Minnesota United MLS Stadium and Surrounding Mixed-Use Urban Village

Alternative Urban Area-Wide Review (AUAR)

MITIGATION PLAN

Prepared for the
City of Saint Paul, MN

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July 18, 2016

Mitigation Plan

The Minnesota Environmental Quality Board (EQB) oversees the state environmental review process, including the development of the State Rules that dictate process and content for environmental review processes and documents. To assist project proposers and Responsible Governmental Unit (RGU) staff in navigation of environmental review processes, the EQB also provides guidance documents. From the EQB guidance on AUARs:

AUAR Guidelines: The final AUAR document must include an explicit mitigation plan. At the RGU's option, a draft plan may be included in the draft AUAR document; of course, whether or not there is a separate item for a draft mitigation plan, the proposed mitigation must be addressed through the document.

It must be understood that the mitigation plan in the final document takes on the nature of a commitment by the RGU to prevent potentially significant impacts from occurring from specific projects. It is more than just a list of ways to reduce impacts -- it must include information about how the mitigation will be applied and assurance that it will. Otherwise, the AUAR may not be adequate and/or specific projects may lose their exemption from individual review. The RGU's final action on the AUAR must specifically adopt the mitigation plan; therefore, the plan has a "political" as well as a technical dimension.

Introduction

This Mitigation Plan is submitted as part of the Final AUAR to provide reviewers, regulators and prospective tenants or purchasers of land with an understanding of the actions necessary to protect the environment and limit potential impacts by proposed development projects. The potential impacts and mitigation strategies included in the Draft AUAR have been revised and expanded upon to address Draft AUAR comments.

This Mitigation Plan is intended to satisfy the AUAR rules that require the preparation of a "mitigation plan" that specifies measures or procedures that will be used to avoid, minimize, or mitigate the potential impacts of development within the AUAR area. Although mitigation strategies are discussed throughout the AUAR document, this plan will be formally adopted by the RGU as its action plan to prevent potentially significant environmental impacts.

The primary mechanism for mitigation of environmental impacts is the effective use of ordinances, rules, and related permitting requirements. The Mitigation Plan does not modify the regulatory agencies' responsibilities for implementing their respective regulatory programs, nor create additional regulatory requirements. The Mitigation Plan specifies the legal and institutional arrangements that will assure that the adopted mitigation measures are implemented. The AUAR will be updated every five years to assess the development process and implementation of the mitigation measures. As part of this process, the Mitigation Plan will also be updated, including the addition of new measures and modification of existing measures, as appropriate.

The Mitigation Plan is organized by the AUAR Item numbers. Table 8-1 from Item 8, Permits and Approvals Required, has been revised to address recent permit application activity and Draft AUAR comments and is adopted as part of the Mitigation Plan. In addition, mitigation measures

are presented for Items 9 through 18. The preparers of the AUAR determined that other AUAR Items did not represent significant environmental impacts that required mitigation measures that go beyond existing ordinance and regulatory requirements; or that the necessary mitigation measures were presented under a different AUAR Item.

Item 8: Permits and Approvals Required

Table 8-1 lists all permits that are anticipated to be required for development in the AUAR area. All required permits and approvals will be obtained. Any necessary permits or approvals that are not listed in the table below were unintentionally omitted, and some listed may not be necessary.

Table 8-1: Anticipated Permit Requirements

Unit of government	Type of Approval	Status
US Fish and Wildlife Service	Consultation regarding Section 7 of the Endangered Species Act (only required if project is federally funded)	Consultation not necessary at this time.
MnDNR	Temporary Water Appropriation Permit for construction dewatering	To be applied for
MPCA	Construction Site Stormwater Permit	To be applied for
	Notification of Intent to Perform a Demolition	To be applied for
MnDOT	Driveway Access Permit & Utility Permits	To be applied for
	Drainage permit	To be applied for
	Permit for use of or work within Snelling Ave. ROW	To be applied for if required
MN Dept. of Health	Water extension permit	To be applied for
	Notification of Asbestos Related Work	To be applied for
Minnesota State Historic Preservation Office	Determination of an Area of Potential Effect	To be submitted
	Determination for NRHP listing eligibility of properties within the Area of Potential Effect	
Metropolitan Council	Sewer extension permit	To be applied for
	Contaminated groundwater discharge permit to sewer	To be applied for if required
	Sewer Permit to Connect	To be applied for
City of St. Paul	AUAR Approval	Anticipated to be submitted to EQB August 2016
	Approval of Master Plan	Anticipated August 2016
	Site Plan Review	Anticipated August 2016
	T4 Zoning Amendment	Anticipated August 2016

	Preliminary Plat	Anticipated August 2016
	Development Agreements	Anticipated August 2016
	Final Plat	Anticipated Fall 2016
	Sign Permit	To be applied for
	Building Permit	To be applied for
	Excavation and Grading Permit	To be applied for
	Certificate of occupancy	To be applied for
	Parkland Dedication	To be applied for
	Ordinance Permit for Construction of Public Improvements	To be applied for
	Right of Way Excavation and Obstruction Permits	To be applied for
	Contaminated groundwater discharge permit to city sewer	To be applied for if required
	Sewer Connection, Repair and Abandonment Permits	To be applied for
	Variance of minimum Floor Area Ratio for a soccer stadium	Applied 7.13.16
	Variance to allow surface parking on a separate lot that may not be shared with another use	Applied 7.13.16
St. Paul Regional Water Services	Plumbing permits	To be applied for
Capitol Region Watershed District	Watershed District Permit for stormwater management and for erosion and sediment control	To be applied for

Item 9: Land Use

POTENTIAL IMPACTS

- The mix of commercial, residential, open space, and institutional uses identified in Scenario 2 are permitted in the T4 zoning district. As noted in question 9a, the T4 zoning district allows entertainment uses. The City of Saint Paul interprets stadiums to be an entertainment use. However, because of the unique scale of stadiums, the City intends to amend its zoning code to allow outdoor sports and entertainment uses in the T4 district. This process is anticipated to be completed in August 2016.

MITIGATION STRATEGIES

- 9-1. The City intends to amend its zoning code to allow outdoor sports and entertainment uses in the T4 district. This process is anticipated to be completed August 2016.

HOW MITIGATION WILL BE APPLIED AND ASSURED

City and regional planning processes will ensure that the project is compatible with existing plans and Metropolitan Council plans and regional systems.

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

Not applicable.

Item 10: Geologic Hazards and Soil Condition

POTENTIAL IMPACTS

- No adverse geologic hazards or soil conditions are expected to be encountered during construction of the AUAR area.

MITIGATION STRATEGIES

- 10-1. If shallow groundwater is encountered in the AUAR area that requires dewatering, a temporary dewatering permit will be required from the Minnesota Department of Natural Resources if the dewatering is expected to exceed 10,000 gallons per day or 1 million gallons per year. Additionally, groundwater will be tested for contamination before dewatering activities begin. If the groundwater is contaminated, State and local agency input will be required to select an appropriate discharge location and/or on-site treatment of contaminated water.

- 10-2. Any wells encountered during construction of the AUAR area that are no longer in use (or are not planned to be used following completion of construction) are required to

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be sealed by a licensed well contractor according to Minnesota Well Code. Wells may be allowed to remain open if an annual Unused Well Permit is obtained and conditions of the permit are followed.

- 10-3. To limit soil erosion, construction plans will include measures that restrict and contain any soil erosion using a variety of methods including silt fencing, seeding, mulching, and limiting the exposure of open soils to wind and rain. Discharge of stormwater will be managed in accordance with the City's National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer systems (MS4) Permit, Stormwater Pollution Prevention Plan (SWPPP) and Construction Site Stormwater Permit to ensure that erosion is limited and that any runoff-receiving water bodies are protected.

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans should require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

Any groundwater issues identified and/or anticipated in future development activities as well as associated mitigation measures will be reported in AUAR updates throughout the development timeline of the site.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

If applicable, the Minnesota DNR would need to permit dewatering.

Item 11: Water Resources

POTENTIAL IMPACTS

Surface Waters

- The AUAR area is fully urbanized and does not contain any surface waters.

Groundwater

- See Item 10.

Wastewater

- Saint Paul Public Works, Sewer Utility does not anticipate any capacity issues within the publicly-owned sanitary sewer system.

Stormwater

- For Scenario 2, a portion of the stadium is proposed to be constructed well below existing grades, thus precluding gravity conveyance. For this area, stormwater storage and pumping will likely be needed.
- The Capitol Region Watershed District (CRWD) rate control requirements should require minimal stormwater control, as the existing site is largely impervious, resulting in little if any increase in impervious coverage. The City's rate control requirement will result in more significant need for stormwater management. A preliminary hydrologic model of the proposed site (under either scenario) provides an estimated 100-year runoff rate of 270 cfs. This is based on the Atlas 14 100-year, 24-hour rainfall of 7.46 inches. The City's rate control requirement calls for this to be reduced to 56 cfs. This is a preliminary number and subject to further analysis and review.

MITIGATION STRATEGIES

- 11-1. As the AUAR area develops, evaluation of wastewater flow generation versus capacity of the existing City sanitary sewer system will be performed. Improvements to the City system will be implemented as needed.
- 11-2. As the AUAR area develops, stormwater Best Management Practices (BMPs) will be implemented to satisfy City, CRWD, and State requirements. Such BMPs could include stormwater storage for rate control; infiltration, filtration, or bioretention for volume control and water quality treatment; rainwater/stormwater harvesting for reuse for volume control and water quality treatment as well as to reduce potable water demand; and temporary erosion and sediment control features such as vegetative restoration, storm drain inlet protection, construction entrance protection, and silt fence.
- 11-3. An effort will be made to address enhanced stormwater management that incorporates shared, stacked-function green infrastructure (SSGI) approaches. The Proposers and appropriate stakeholders will work out the details of these approaches in the future.
- 11-4. Stormwater detention and pumping and/or conveyance to other BMPS will be used to manage stadium runoff.
- 11-5. The existing Saint Paul Regional Water Services (SPRWS) water supply system has the available capacity to serve the AUAR area. However, lower pressures of 38-42 psi in the system may necessitate booster pumps for facilities that require greater water pressure. Multi-story structures will need booster pumps to service upper floors with sufficient water pressure.

HOW WILL MITIGATION BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of

approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

Any stormwater issues identified and/or anticipated in future development activities as well as associated mitigation measures will be reported in AUAR updates throughout the development timeline of the site.

INVOLVEMENT BY OTHER AGENCIES

Not applicable.

Item 12: Solid Wastes, Hazardous Wastes, Storage Tanks

POTENTIAL IMPACTS

The potential to encounter contaminants is the same under the two development scenarios. Potential impacts of these contaminants include:

- The building demolition will generate an estimated 25,600 tons of debris and remove approximately 650,000 square feet of bituminous parking area.
- A release of petroleum hydrocarbons and volatile organic compounds from the previous site activities to the soil and/or groundwater.
- The range of municipal solid waste (MSW) generated per year based upon the development scenarios is 2,900 to 3,400 tons.
- Potential environmental impacts to the northern portion of the AUAR area have not been investigated.

MITIGATION STRATEGIES

- 12-1. Complete a pre-demolition Hazardous Building Materials Survey of the existing buildings in accordance with Minnesota Department of Health (MDH) and Minnesota Pollution Control Agency (MPCA) requirements prior to the start of demolition activities to determine if any regulated materials are present. An Abatement Plan will be prepared to address the removal and proper disposal of regulated materials identified in the Hazardous Building Materials Survey.
- 12-2. Demolition wastes will either be recycled or disposed in the proper facilities.
- 12-3. The southern portion of the AURA area will be enrolled in the MPCA's Voluntary Investigation and Clean-up (VIC) Program and Petroleum Brownfields Program (PBP).
- 12-4. A Response Action Plan and Construction Contingency Plan (RAP/ CCP) has been prepared by a third party (Braun Intertec) and approved by the MPCA. The RAP summarizes environmental response actions and includes procedures for managing contaminated media, subsurface vapors and other environmental mitigation measures during construction. The CCP includes measures for handling unknown contaminated materials that may be encountered during construction.
- 12-5. Manage MSW according to MPCA and other regulatory requirements.

- 12-6. Investigate the northern portions of the AURA area prior to redevelopment. Prepare RAP/CCP based on results of the investigation. Complete a pre-demolition Hazardous Building Materials Survey of the existing buildings in accordance with MDH and MPCA requirements prior to the start of demolition activities to determine if any regulated materials are present.
- 12-7. In the event hazardous materials are encountered (or suspected) during excavation of the man-made fill on site, an environmental investigation to determine the type and volume of these materials will be required, including a plan to safely excavate and properly dispose of the materials encountered. The RAP/CCP Plan submitted to MPCA in April 2016 details appropriate methods to handle and dispose of any such materials that are encountered.
- 12-8. A RAP/CCP will be prepared prior to development of the northern portion of the AUAR area. If contamination is encountered that precludes residential uses then the AUAR will be updated with a revised land use program.

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through demolition permit requirements and standards of the City, MPCA, MDH, Occupational Safety and Health Administration, and other applicable regulatory agencies. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

The MPCA will be contacted if residual petroleum contamination is discovered.

Item 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources

POTENTIAL IMPACTS

- Scenarios 1 and 2 would have similar impacts, including no effect on fish, wildlife, plant communities, rare features and ecosystems.
- Neither Scenario 1 nor Scenario 2 will have a significant adverse effect on federally or state-listed threatened and endangered species within the AUAR area.
- A small number of trees are present within the AUAR area, which may be utilized by Northern Long-Eared Bats (NLEB). Under the Final 4(d) Rule of the ESA, tree clearing is not prohibited as there are no records of NLEB maternity roost trees or a hibernaculum within the AUAR area or a 0.25-mile buffer.

- Urban wildlife may be impacted by the removal of trees throughout the AUAR area and disturbance to unmaintained grasses; however these habitat generalist species are typically adaptive to development activities. Scenario 2 will result in slightly more maintained green space (1.13 acres) than is proposed in Scenario 1.
- Construction activities in grassland, roadsides, shrubland, or tree habitats within the AUAR area may result in the taking of migratory birds, eggs, young and/or active nests, if present.
- Construction activities that involve soil disturbance can result in the introduction and spread of invasive species.
- The MNDNR recommends in its comment letter dated March 23, 2016 that native plants be used for landscaping, including areas such as entrances, roadsides, property borders, parking separation, and infiltration zones.

MITIGATION STRATEGIES

- 13-1. Tree clearing will occur between mid-August and mid-April to minimize impacts on NLEB and migratory birds. If tree clearing during this window cannot be avoided, additional steps, including but not limited to field surveys, will be completed.
- 13-2. If project activities will receive general obligation bond funding from the State of Minnesota, building and other construction designs must adhere to the Minnesota B3 Guidelines, which include strategies for developing bird-safe buildings and meet other sustainability goals. These guidelines can also be used on a voluntary basis on any project.
- 13-3. For construction of the stadium and appurtenant areas, best efforts shall be made to meet the intent of the Saint Paul Sustainable Building Policy.
- 13-4. When future projects receive more than \$200,000 from the City of Saint Paul or Saint Paul HRA, that entity will determine whether or not the projects need to comply with the Saint Paul Sustainable Building Policy.
- 13-5. BMPs and ESCDs will be used during construction activities to prevent sediment-laden stormwater runoff from the AUAR area.

- 13-6. To the maximum extent practicable, native plants will be used for landscaping within the AUAR area to prevent the introduction and spread of invasive plants and noxious weeds.
- 13-7. Minnesota statutes (Chapter 18) and local ordinances regulate management of noxious weeds and invasive species. Best management practices (BMPs) during construction activities and operation within the AUAR area will be implemented to minimize the introduction or spread of noxious weeds and invasive species at the site.

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

Not applicable.

Item 14: Historic Properties

POTENTIAL IMPACTS

- Scenarios 1 and 2 propose full development of the AUAR area, including demolition of all existing buildings. Two buildings in the AUAR area that are eligible for NHRP listing would be demolished: the Midway National Bank and the Midway Shopping Center West Building.
- No impacts to archeological sites or traditional cultural properties are anticipated.

MITIGATION STRATEGIES

- 14-1. Because the site is entirely built and paved, a Phase I archeological survey cannot be completed until demolition begins. However, once pavement is removed, the site will be monitored by a qualified archeologist to ensure no archeological features exist.
- 14-2. The City of Saint Paul will review the Central Corridor Final EIS and update the State Historic Preservation Office (SHPO) of any changes relating to historic structures since that document's publication. This includes changes to both federal and state procedures for evaluating standing structures, noting whether any buildings have been razed or altered since the previous evaluation, and whether any buildings in the indirect and direct Area of Potential Effect are eligible for NRHP listing. After the APE is agreed upon with SHPO and other concerned parties, the City of Saint Paul will complete the aforementioned analysis.

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans should require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

The City of Saint Paul will work with the Minnesota State Historic Preservation Office to comply with requirements for preservation of historic structures. The City of Saint Paul will complete a Phase 1 archeological survey after pavement is removed from the site before construction begins.

Item 15: Visual

POTENTIAL IMPACTS

- No visual impacts are anticipated in Scenario 1.
- Buildout of Scenario 2 could result in visual effects related to light trespass from stadium field lighting. There will be a glow from the reflected light but it will be limited and no light pollution will impact the surrounding areas.

MITIGATION STRATEGIES

- 15-1. The stadium's planned design locates sports light fixtures underneath the stadium's canopy. Figure 15-1 in the Final AUAR depicts anticipated mounting conditions of light fixtures to direct glow toward the playing field. Fixtures will have internal shielding and external glare shrouds and will be aimed to optimize the lighting on the playing field. All fixtures will be aimed down so that no direct lighting will leave the confines of the stadium.
- 15-2. All development in the AUAR area shall be consistent with Sec. 63.116 of its Zoning Code or the project proposer will need to obtain a variance

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

Not applicable.

Item 16: Air

POTENTIAL IMPACTS

- No stationary source emissions are anticipated through development of the AUAR area.
- Under the build scenarios there may be localized areas where ambient concentrations of MSATs would be higher than under the no build conditions. However, the magnitude and duration of these potential differences cannot be reliably quantified, as noted in the Technical Memorandum, due to incomplete or unavailable information in forecasting project-specific health impacts. On a region-wide basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will cause substantial reductions over time that in almost all cases the MSAT levels in the future will be significantly lower than today.

MITIGATION STRATEGIES

- 16-1. No exceedances of air pollutant concentrations resulting from the proposed project are anticipated; therefore, no mitigation measures are necessary.
- 16-2. No exceedances are anticipated under the construction phase. However, a series of Best Management Practices (BMPs) will be implemented during construction to control dust. These will include the following preventive and mitigative measures:
- Minimization of land disturbance during site preparation to the extent practical
 - Use of watering trucks to minimize dust
 - Stabilization of dirt piles in accordance with applicable Minnesota Pollution Control Agency standards
 - Use of dust suppressants on unpaved areas as appropriate for weather conditions
 - Minimization of unnecessary vehicle and machinery idling
 - Revegetation of any disturbed land post-construction in accordance with applicable Minnesota Pollution Control Agency standards

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

Not applicable.

Item 17: Noise

POTENTIAL IMPACTS

- Calculated sound levels from the stadium permanent seating bowl sound system and crowd noise, are not expected to exceed the City of St. Paul daytime noise level standard at the closest noise-sensitive uses.
- Daytime noise levels would exceed standards for residential uses proposed in Scenario 2 at locations north and east of the stadium (see Figure 17-2 in the Final AUAR). During nighttime hours, the sound system may exceed the applicable sound level limit, depending on how long an event extends beyond 10:00 pm and how loudly the sound system is operated. Crowd noise may also exceed the City's nighttime limits.
- The measured ambient levels indicate that sound from stadium sporting events, even when compliant with the City regulations, can be expected to be audible at the homes and properties nearest the site.
- Modeled traffic noise levels exceed state daytime and nighttime L₁₀ and L₅₀ standards for NAC-1 at residential receptor locations west of the AUAR area and Snelling Avenue under future No Build and Build conditions.
- Modeled traffic noise levels exceed state daytime L₁₀ standards for NAC-2 at one commercial receptor location at the Snelling Avenue/University Avenue intersection under existing, future No Build, and future Build conditions. Modeled traffic noise levels at other commercial receptor locations surrounding the AUAR area would be below state daytime and nighttime standards for NAC-2 under future No Build and Build conditions. Therefore, mitigation measures at modeled receptor locations surrounding the AUAR area were not evaluated.

MITIGATION STRATEGIES

- 17-1. The overall system loudness should be electronically limited so that levels in the spectator seating cannot exceed levels that are compliant with the City standards. The calculations assume a maximum of 90 dBA at the spectator seating to limit the noise level at the closest residences to 65 dBA L₁₀.
- 17-2. Sporting events will be scheduled so that regulation play is completed by 10 pm or MN United FC will need to obtain a sound level variance.
- 17-3. Plaza amplified sound sources are to be configured and operated at levels which are consistent with the City noise standards.
- 17-4. Any amplified music associated with stadium events, such as small musical groups performing pre-game in the seating bowl or exterior plaza, must be limited in loudness to comply with the City noise ordinance.

- 17-5. Continuous pre-game and half time stadium sound system levels will likely have to be lower than in game announcements, in order to meet the City noise regulations.
- 17-6. Future development on the stadium site will be designed with the understanding of the activities occurring at and noise levels generated by the stadium. Construction of Class II receptor uses within the 65 dBA, L₁₀ contour will require mitigation through decreased stadium sound levels or other means, such as a sound level variance.
- 17-7. The AUAR area is anticipated to be redeveloped in a phased manner to accommodate a mixed-use development including retail and service commercial, hospitality, residential, office, and open space uses. As shown in Figure 17-3 in the Final AUAR, locating outdoor use areas towards the interior of residential, hospitality, and office buildings will help prevent traffic noise impacts at these future uses. Locating outdoor uses in this manner results in greater setback distances from adjacent roadways (e.g., modeled L₁₀ noise levels at approximately 50 feet from University Avenue and Pascal Street were projected to be below state daytime L₁₀ standards for NAC-1). The buildings themselves also function to shield the outdoor use areas from traffic noise generated on nearby roadways.

HOW MITIGATION WILL BE APPLIED AND ASSURED

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INVOLVEMENT BY OTHER AGENCIES, IF APPLICABLE

Item 18: Transportation

POTENTIAL IMPACTS

- Need to accommodate transportation modes internal and around the proposed site and provide access to the existing public roadway system
- Access to Snelling Avenue from the site and the signalized intersection spacing between Spruce Tree and University of Avenue
- Pascal street operations and access to the site
- Poor operations of the Hamline Avenue and Marshall Avenue intersection under full build development
- Traffic operations along Snelling Avenue from Selby Avenue to University Avenue with each phase of development
- Actual site trip generation and encouraging use of transit
- Event traffic operations and management of 20,000 capacity crowd at the soccer stadium and with potential expansion to 25,500.

MITIGATION STRATEGIES

- 18-1. Construct an internal roadway system to serve transportation modes, including sidewalks (minimum of eight feet) and bikeways (as appropriate). Provide a minimum of 400 bike racks at year of stadium opening. Complete with each phase of development.
- 18-2 Relocate the traffic signal on Snelling Avenue from Spruce Tree to Shields Avenue. Spruce Tree intersection would be modified to a right-in/right-out access. Relocation does not need to occur until such time as development of portions of the site for purposes other than the stadium and associated parking occurs. Extend the northbound left-turn lane at University Avenue. Subject to final approval of the City of Saint Paul and MnDOT of roadway design and lane configuration, at the time the traffic signal is relocated to Shields Avenue, Shields Avenue east of Snelling Avenue should be constructed to provide three-lanes of approach for westbound with two left-turn movements; left-turn lane, left-thru lane and right turn lane. Pedestrian movements should be accommodated on the north side in a 20 foot crosswalk. Complete with internal roadway development.
 - a) Consider median fencing along Snelling Avenue between Shields Avenue and University Avenue to encourage use of the traffic signals for pedestrian crossings.
- 18-3 Install a traffic signal at Pascal Street and Shields Extension intersection when enough development traffic meets warrants. Re-stripe Pascal Avenue to provide a three-lane roadway (one thru lane in each direction with left-turn lane) with the additional space as a bike-lane or shoulder and retain additional right-of-way for future roadway considerations. Install a permanent traffic signal at Pascal Street and Saint Anthony. Complete with the phased development.
- 18-4 Add an Eastbound right-turn lane during the peak hours by restricting 100 feet of parking along Marshall Avenue at Hamline Avenue. Completed with phased development and not needed in year of opening.
- 18-5 Update the traffic study and signal timing along Snelling as needed with each phase of master plan development.
- 18-6 Implement TDMP (Travel Demand Management Plan) strategies with future re-development and promote TOD (Transit Oriented Development) and complementary land uses.
- 18-7 Form a Transportation Management Committee (TMC) responsible for development of a Transportation Management Plan (TMP) for stadium events. TMC should meet regularly as needed to complete TMP prior to stadium opening, as needed during first year of operation, and at least twice a year thereafter. Potential participants include MN United FC, RK Midway, City of Saint Paul, Metro Transit, Ramsey County Public Works, MNDOT, and community representatives.

- 18-8 Develop a Transportation Management Plan (TMP) for year of opening of the stadium that includes event traffic control, parking plan, transit plan, shuttle service to remote parking, routing/wayfinding plan, communication/education plan, and incident management/safety plan. TMP would be a living document updated based on modifications to the site or expansion of the stadium.
- 18-8.1 Event Traffic Control Plan should address quantity and locations of traffic control agents, location, sizing and configuration of pedestrian/transit/shuttle staging areas and movement paths, needed road closures, and event signal timing.
- 18-8.2 Parking Plan features:
 - 18-8.2.1 Parking on-site and within a mile of the stadium should be reserved and purchased with game tickets. Strategies for ensuring high vehicle occupancy for these spaces, such as requiring multiple ticket purchases to access on-site parking, should be explored.
 - 18-8.2.2 Agreements for use of existing off-street parking facilities within walking distance of the stadium for event parking should be considered. Pre-sale of parking at these locations should be considered, and patrons should be directed to access by routes that do not pass through the intersection of Snelling and I-94.
 - 18-8.2.3 Locations of remote/shuttle parking locations should be communicated to all patrons. Pre-sale of parking at these locations should be considered.
 - 18-8.2.4 Off-site parking locations for patrons travelling via LRT and BRT should be identified and communicated to all patrons.
- 18-8.3 Transit Plan features:
 - 18-8.3.1 The TMC should work with Metro Transit to identify preferred alternatives for movement and queueing of transit riders on the AUAR site. Modification of alternatives may need to occur as redevelopment of the site occurs.
 - 18-8.3.2 The TMC should work with Metro Transit to evaluate the feasibility of continued operation of LRT and BRT at peak frequency (10-minute headways) through end of event departure periods, availability of 3-car LRT trains through end of event departures, and availability of supplemental bus or train service on LRT, BRT and regular route transit during events.
- 18-8.4 Shuttle/Remote Parking:
 - 18-8.4.1 The TMP should plan for service to accommodate 7,000-8,000 patrons for games at year of opening. This number can be reduced as additional off-street parking within walking distance is identified.
 - 18-8.4.2 The TMP should designate shuttle staging areas and patron boarding and alighting areas at or near the stadium site
- 18-8.5 The Routing and Wayfinding Plan should identify and provide directions to LRT and BRT stations, regular route transit locations, parking within walking distance, and bike parking facilities. The TMC should consider the use of Changeable Message Signs (CMS) on the freeway, local streets, and on-site.
- 18-8.6 The Communication and Education Plan should emphasize the limited availability of on-site and nearby parking, and encourage the use of transit, remote parking/shuttles, and private charters.

HOW MITIGATION WILL BE APPLIED AND ASSURED

Mitigation will be regulated through the City's development approval and permitting process. All zoning approvals, including but not limited to master plans, plats, and/or site plans will require implementation of relevant mitigation measures, as identified in this plan, as a condition of approval by the City. Implementation of mitigation measures will be assured through any and all development agreements with the city and/or through the withholding or revocation of building permits and/or certificates of occupancy until such time as all relevant mitigation measures have been addressed and/or financial sureties sufficient to ensure completion of mitigation measures have been obtained.

The Traffic Management Committee will conduct on-going traffic monitoring to assess traffic volume growth and any operational issues that may develop in and around the AUAR area. This monitoring program is intended to notify the City, County, MnDOT and other agencies of the need to further evaluate intersections, accesses and roadway segments within the AUAR area for their operational impacts on the transportation system.

GENERAL IMPLEMENTATION TOOLS:

- The proposed development will require an amendment to the City's current Zoning Ordinance and other City Code and permit requirements.
- Development of this project will require the approval of a site plan for the proposed stadium and appurtenant areas and a master plan for the entirety of the AUAR area. Future phases of development pursuant to the master plan will require site plan approvals.
- Enforcement of the permitting requirements of all applicable local, state, and federal agencies.
- Update the AUAR if the following conditions or assumptions change in accordance with MN Rules 4410.3610, subp. 7:
 - Five years have passed since the RGU adopted the original environmental analysis document and plan for mitigation or the latest revision. This item does not apply if all development within the area has been given final approval by the RGU.
 - A comprehensive plan amendment is proposed that would allow an increase in development over the levels assumed in the environmental analysis document.
 - Total development within the area would exceed the maximum levels assumed in the environmental analysis document.
 - A substantial change is proposed in public facilities intended to service development in the area that may result in increased adverse impacts on the environment.
 - Development or construction of public facilities will occur on a schedule other than that assumed in the environmental analysis document or plan for mitigation so as to substantially increase the likelihood or magnitude of potential adverse environmental impacts or to substantially postpone the implementation of identified mitigation measures.
 - New information demonstrates that important assumptions or background conditions used in the analysis presented in the environmental analysis document

are substantially in error and that environmental impacts have consequently been substantially underestimated.

- o The RGU determines that other substantial changes have occurred that may affect the potential for, or magnitude of, adverse environmental impacts.