

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

Transmitted by Email

March 11, 2021

Tim Gladhill
Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN 55303

Dear Mr. Gladhill,

Thank you for the opportunity to review the Riverstone South EAW. The DNR respectfully submits the following comments for your consideration:

1. Page 2, Project Description; Appendix E, Tree Survey. While we appreciate that over 7 acres of forest will remain, we would prefer that as much of the remaining 16.17 acres of woodland be preserved as possible. According to the tree survey, 2,305 significant trees were identified of 28 different species. This region of the state once had vast areas of contiguous forest and wetlands, which in the more recent past has been converted to non-forested/natural land uses. It's important to preserve this natural heritage to the greatest extent possible. Albeit small and fragmented, these remnant forests are still ecologically important and can better buffer activities from other land-uses as well as provide more habitat for the plants and animals if larger sections are left intact.
2. Page 6 & 7, Floodplain. We are pleased that the lowest levels of the homes will be above the flood protection elevations.
3. Page 15, Stormwater. The development should consider using water from the "Lake" for irrigating landscaping in the development. The use of water from a constructed stormwater facility (not previously a wetland, stream, or lake) is exempt from the need for a DNR Water Appropriation Permit.
4. Page 16, Stormwater. 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 applicator participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. 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.

5. Page 22, Section 13.a. Tree trimming and removal is strongly discouraged from April 1 through July 15 unless all cuts and wounds on oaks (*Quercus* spp.) are painted within 10 minutes with a water soluble paint or shellac. The outer three growth rings and bark should be totally covered with paint. Information about oak wilt prevention can be found at the DNR's [website](#).
6. Page 22, Section 13.a. Consider incorporating native, pollinator-friendly landscaping into open park space and stormwater features.
7. Page 24, Section 13.c. As the EAW states, Blanding's turtles (*Emydoidea blandingii*), a state-listed threatened species, have been documented in the vicinity of the proposed project. This project has the potential to impact this rare turtle through direct fatalities and habitat disturbance/destruction due to excavation, fill, and other construction activities associated with the project. 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. As such, **the following avoidance measures are required:**
 - The [Blanding's turtle flyer](#) must be given to all contractors working in the area.
 - 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 its 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.
 - Monitor for turtles during construction and report any sightings to the DNR Nongame Specialist, Erica Hoaglund (Erica.Hoaglund@state.mn.us).
 - 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 Lisa Joyal (lisa.joyal@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 for your project.** For further assistance regarding the Blanding's turtle, please contact the DNR Regional Nongame Specialist, Erica Hoaglund.

For specific recommendations pertaining to roads, refer to Curb Design and Small Animals, Preventing Entanglement, & Reducing Wildlife Vehicle Collisions in [Chapter One of the Minnesota Department of Transportation's Best Practices Manual](#).

8. Page 28, Dust. Please note that taking water from the Mississippi River for dust control in volumes that exceed 10,000 gallons of water per day requires approval under a DNR Water Appropriation Permit. In addition, the owner of the land from which the water is taken is required to give permission to the company to use their land to take water from the river.
9. Page 28, Dust. We appreciate that water will be used for dust control instead of calcium chloride.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Collins". The signature is written in black ink on a light blue rectangular background.

Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5755
Email: melissa.collins@state.mn.us

CC:

Equal Opportunity Employer

March 9, 2021

Tim Gladhill
Deputy City Administrator
City of Ramsey
7550 Sunwood Dr NW
Ramsey, MN 55303

RE: Riverstone South Environmental Assessment Worksheet
T32 R25 S29 & S30, Ramsey, Anoka County
SHPO Number: 2021-0893

Dear Tim Gladhill:

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

We have reviewed the information included in the EAW as well as the submitted cultural resources survey report titled *Phase I Archaeological Survey of Proposed Housing Development in Ramsey, Anoka County, Minnesota* (October 27, 2020) as prepared by Nienow Cultural Consultants. Based on the results of the survey, we conclude that there are no properties listed in the National or State Registers of Historic Places and no known or suspected archaeological properties 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 Specialist, at kelly.graggjohnson@state.mn.us if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

MnDOT Drainage Permits Checklist

Purpose of the MnDOT Drainage Permit

MnDOT Metro District regulates activities that impact its drainage systems and its MS4 regulated area. The purpose of the Drainage Permit is to protect State of Minnesota investment in infrastructure including but not limited to roadways, storm water treatment basins, ditches and storm sewer systems. Excess storm water and/or sediment laden storm water added to MnDOT's drainage systems leads to degradation of these assets. Negative impacts include but are not limited to: sediment deposition, loss of flood storage capacity and also loss of hydraulic conveyance capacity. These impacts may cause premature flooding of the road surface and/or erosion damage on State right-of-way.

Technical Requirements of the MnDOT Drainage Permit

The permit applicant shall demonstrate that offsite runoff coming to MnDOT drainage system and/or right-of-way will not increase as a result of the proposed project. This is quantified as a "no increase in discharge" criteria for the 2-year, 10-year and 100-year storm events. Compliance is demonstrated by applying hydraulic/hydrologic software models. HydroCAD and XPSWMM are the approved models to compare the pre and post project discharge values. Typically, HydroCAD is sufficient to model most proposed projects. However, XPSWMM may be required if the project contains extensive storm water pipe systems connected to MnDOT storm sewer or if HydroCAD cannot in MnDOT's judgment effectively model pressure flow, complex junctions and/or backwater effects that are present. The 2-year, 10-year and 100-year storm events shall be based upon Atlas 14 runoff amounts per the NOAA website.

In addition, Drainage Permit Applicants shall meet all applicable water quality treatment requirements established by the local Watershed District(s) and the MPCA.

Permit applicants should anticipate that specific projects that seek to divert runoff to another sub-watershed or watershed will be denied. It is MnDOT practice to avoid such watershed diversions whenever practicable.

Submittal Requirements:

- Readable/legible watershed maps that show pre and post project drainage conditions. These two separate contour maps shall be large enough in scale so that approximate flow paths can be determined for verifying the Time of Concentrations used in the models. The drainage/watershed maps shall include enough detail so that Curve Numbers used in the hydraulic models may be verified by MnDOT.

- Surface water flow direction and storm water pipe water flow direction shall be indicated on the pre and post project watershed maps.
- Minimum recommended watershed map scale is 1"=100'. Project applications submitted with smaller scales (e.g., 1"=500') may be rejected and returned to the applicant. The same would apply for project watershed maps that do not include topographic contours or basic land use information such as the location of buildings, pavement and "green space". Watershed maps submitted as pdf files or CAD files shall be readily printable at scales that allow for good readability.
- Pre and post project watershed maps shall be clearly linked to the drainage models such that the names of the sub-watersheds, ponds and drainage structures are the same in the models as shown on the watershed maps. In addition, watershed and sub-watershed boundaries shall be clearly shown.
- Submission of the actual pre and post project HydroCAD or XPSWMM models is required: pdf copies of the drainage model simulations are unacceptable. In the event that the models cannot be transferred readily by electronic mail or electronic repository site, a hardcopy CD shall be provided.
- Curve numbers shall be determined per NRCS methodology and should be modified as needed based upon detailed knowledge of soil type and specific conditions on site. HydroCAD modeling software includes NRCS guidance for determining curve numbers based upon land use and condition.
- Time of concentration (Tc) computations and assumptions that in MnDOT's assessment clearly overestimate or underestimate this critical runoff parameter will be rejected. Two common assumptions that lead to overestimating Tc include: using the "Lag/CN" method to determine peak runoff from watersheds that have a relatively long and/or diverse flow path, and assuming that sheet flow occurs for a distance exceeding 100 feet. Conversely, pre-project Tc shall not be underestimated to offset post project increases in peak discharge.
- Available freeboard for existing and proposed treatment ponds shall be shown on the watershed maps as well as the normal and 100-year high water levels. All proposed pond treatment systems along MnDOT right-of-way shall have a minimum freeboard of 2.0 feet between the road surface and the proposed 100-year HWL.
- Infiltration basins, filtration basins and ponds adjacent to MnDOT right-of-way shall be designed to provide at least 2 feet of elevation difference between the 100-year HWL and the crest of the basin berm. The berm crest shall be at least 5 feet wide. The emergency overflow shall be lined from crest to toe of slope with Turf Reinforcement mat or Category 6 or 7 Erosion Control Blanket.

- Best management practices (BMP's) including infiltration/filtration sites, storm water ponds, etc. shall be clearly labeled on the pre and post project watershed maps.
- Plan sheets submitted as watershed maps shall be evaluated as such. They shall be readable and legible and meet all the same requirements including clear delineation of watershed boundaries, readable map scale, and land use shown by an aerial photo background map, or that is clearly depicted based on details on the plan sheet or sheets submitted.
- Project plan sheets relevant to the Drainage Permit are required and include: existing site conditions, the proposed grading plan as well as proposed site drainage system plans and profiles. The plans shall include applicable wetland impact/mitigation features and temporary sediment and erosion control measures for the project. In addition, erosion control blanket will be used to stabilize disturbed area on MnDOT right-of-way unless other methods such as rip-rap treatment are called for in the plans and approved by MnDOT.
- Pond and basin special structures including weirs and orifices shall be consistent with what is used in the HydroCAD or XPSWMM models submitted and include relevant calculations/details.
- A table summary of existing versus proposed site discharge to MnDOT drainage system/right-of-way is required for the 2-year, 10-year and 100-year Atlas 14 rainfall events.
- Post project storm water discharge to MnDOT ditches or other open channel shall be limited to flow velocities of 6 fps or less for a 50-year Atlas 14 rainfall event.
- Project discharge points that will connect to MnDOT ditch or channel shall be located such that they do not cause erosion or conflict with the grade of the existing ditch or channel.
- Proposed access road culverts on MnDOT right-of-way shall be designed for the 10-year Atlas 14 rainfall event unless they are part of a significant drainage ditch along the roadway in which case a 100-year or 50-year design will apply.
- Direct connections to MnDOT storm system shall be avoided. Connection to open ditch, or channel is preferred. If direct storm sewer connections cannot be avoided, it is the applicant's responsibility to provide a good connection typically via a new structure. Furthermore, MnDOT offers no warranty that there will not be a hydraulic backwater effects on the new storm line upstream that is connected to MnDOT's existing storm sewer.

- For all disturbed areas that sheet flow to MnDOT right-of-way and any disturbed areas within MnDOT right-of-way, either Erosion Control Mat or Bonded Fiber Matrix shall be used for temporary/permanent erosion control.
- Silt fence shall not be used for erosion control at the proposed project site perimeter. Rather, continuous Wood Chip or compost Sediment Control Logs shall be implemented.

Permit applicants are encouraged to contact MnDOT Metro Water Resource Engineering with questions/concerns. Questions posed early in the permit application process help to avoid project delays. This is particularly true for large project Drainage Permits with significant complexity.

February 24, 2021

Tim Gladhill
Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN 55303

SUBJECT: MnDOT Review # EAW21-003
Riverstone South Project EAW
SE Quad US 10/US 169 & Bowers Drive NW
Ramsey, Anoka County

Dear Mr. Gladhill:

Thank you for the opportunity to review the **Riverstone South EAW**. MnDOT has reviewed the documents and has the following comments:

Because so many of the comments refer to the previous letter I've attached a copy of that letter.

Noise:

Same comments as in previous letter for Development Review P20-081.

If you have any questions regarding MnDOT's noise policy please contact Natalie Ries in Metro District's Noise and Air Quality Unit at Natalie.Ries@state.mn.us or 651-234-7681.

Traffic:

No comments at this time, but MnDOT wants to continue to be involved as designs develop in the future.

If you have any questions regarding this comment please contact Ashley Roup in Metro Traffic Unit at 651-234-7815 or ashley.roup@state.mn.us.

Multimodal:

Same comments as in previous letter for Development Review P20-081.

For questions regarding these comments, contact Jesse Thorsen, Metro Multimodal, at Jesse.Thorsen@state.mn.us or 651-234-7788.

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Water Resources:

Same comments as in previous letter for Development Review P20-081.

For questions regards these comments, contact Jason Swenson, Metro Water Resources, at jason.swenson@state.mn.us or 651-234-7539.

Permits:

Same comments as in previous letter for Development Review P20-081.

Permits can be applied for at this site: <https://olpa.dot.state.mn.us/OLPA/>. Please upload a copy of this letter when applying for any permits.

Please direct questions regarding permit requirements to Buck Craig of MnDOT's Metro Permits Section at 651-775-0405 or Buck.Craig@state.mn.us.

Review Submittal Options

MnDOT's goal is to complete reviews within 30 calendar days. Review materials received electronically can be processed more rapidly. Do not submit files via a cloud service or SharePoint link. In order of preference, review materials may be submitted as:

1. Email documents and plans in PDF format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. Documents can be zipped as well. If multiple emails are necessary, number each message.
2. PDF file(s) uploaded to MnDOT's external shared internet workspace site at: <https://mft.dot.state.mn.us/metrodevreviews.dot@state.mn.us>. Contact MnDOT Planning development review staff at for uploading instructions, and send an email listing the file name(s) after the document(s) has/have been uploaded.

If you have any questions concerning this review, please contact me at (651) 234-7797.

Sincerely,



Cameron Muhic
Senior Planner

Copy sent via E-Mail:

Buck Craig, Permits
Mark Fairbrother, Water Resources
Anthony Wotzka, Area Engineer
Matthew Wernet, Surveys
Mackenzie Turner Bargaen, Multimodal
Natalie Ries, Noise
Russell Owen, Metropolitan Council

Lance Schowalter, Design
Jason Swenson, Water Resources
Michael Lynch, Right-of-Way
Ashley Roup, Traffic
Jesse Thorsen, Multimodal
Jason Junge, Transit

From: [Tegdesch, Elizabeth \(MPCA\)](#)
To: [Tim Gladhill](#)
Cc: [Kromar, Karen \(MPCA\)](#); [Card, Dan \(MPCA\)](#); [Getman, Roberta \(MPCA\)](#); [Findorff, Michael \(MPCA\)](#); [Char, Fawkes \(MPCA\)](#)
Subject: MPCA Comment Letter - Riverstone South
Date: Monday, March 8, 2021 2:55:08 PM
Attachments: [Riverstone South Comment Letter.pdf](#)

Attached are the Minnesota Pollution Control Agency's comments on the Riverstone South Project Environmental Assessment Worksheet.

Please acknowledge receipt of this comment letter to Karen Kromar at Karen.kromar@state.mn.us

Thank you.

Elizabeth Tegdesch
Environmental Review
651-757-2100
Elizabeth.tegdesch@state.mn.us

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December 30, 2020

Tim Gladhill
Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN 55303

SUBJECT: MnDOT Review # P20-081
Riverstone South
SE Quad US 10/US 169 & Bowers Drive NW
Ramsey, Anoka County

Dear Mr. Gladhill:

Thank you for the opportunity to review the **Riverstone South** development. MnDOT has reviewed the documents and has the following comments:

Noise:

MnDOT's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from this highway could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation. Minnesota Rule 7030.0030 states that municipalities having the authority to regulate land use shall take all reasonable measures to prevent the establishment of land use activities, listed in the MPCA's Noise Area Classification (NAC), anywhere that the establishment of the land use would result in immediate violations of established State noise standards.

MnDOT policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures in such developed areas. The project proposer is required to assess the existing noise situation and take the action deemed necessary to minimize the impact to the proposed development from any highway noise.

If you have any questions regarding MnDOT's noise policy please contact Natalie Ries in Metro District's Noise and Air Quality Unit at Natalie.Ries@state.mn.us or 651-234-7681.

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Traffic:

MnDOT recommends a traffic impact study be completed due the final development plan generating close to 2,500 trips per day and the possible impacts to US 10, neighboring roads and accesses. The preferred access for the development to US 10 would be through the new interchange at Armstrong.

If you have any questions regarding this comment please contact Ashley Roup in Metro Traffic Unit at 651-234-7815 or ashley.roup@state.mn.us.

Multimodal:

When pedestrian facilities (i.e. the sidepath along US 10/US 169) are impacted due to maintenance or construction, pedestrian accommodations must be provided to the maximum extent feasible.

These accommodations should be made detectable and must have accessibility features up to the level of the disturbed route. Signage and devices, as necessary, must be provided to direct pedestrians safely through the work zone. Guidance for pedestrian accommodations through work zones can be found here: <http://www.dot.state.mn.us/trafficeng/workzone/apr.html>. The new street connection should include curb ramps in accordance to [MnDOT Standard plan 5-297.250](#) and should match the width of the existing facility.

Because of the density of homes proposed with this development, constructing sidewalks along both sides of the internal street network should be considered. Also consider constructing a sidepath/trail along the south side of Riverdale Drive for its full length to expand the non-motorized network and connect to the sidepath along US 10/US 169.

For questions regarding these comments, contact Jesse Thorsen, Metro Multimodal, at Jesse.Thorsen@state.mn.us or 651-234-7788.

Water Resources:

When Bowers Drive is constructed as a cul-de-sac, the existing entrance culvert between the south trail and US 169 westbound should be removed and returned to a ditch section. When the connection of the proposed Riverdale Drive with US 169 westbound is made, an entrance culvert should be added between the trail and US 169 westbound; a 15" Reinforced Concrete Pipe (RCP) entrance culvert may be large enough based on the existing entrance culverts located east of the new intersection. The "Lake" identified in Outlot G doesn't show an outlet. Although the High Water Level (HWL) indicates the lake will contain a 100-yr event, an outlet would be prudent for the possibility of back-to-back 100-year events or a super-event. Although Pond 300 in Outlot B is identified as a concept, if incorporated, then hydraulics information will be required to ascertain any impacts to MnDOT right-of-way.

A drainage permit is required. The development will need to maintain or reduce existing drainage flow rates to MnDOT right of way. The submitted information appears to accomplish this, although the most current plan information will need to be reviewed during the permit application process.

Drainage calculations and supporting information related to contributing flow to MnDOT right-of-way may be requested. If requested during that review, existing and proposed drainage area maps and hydraulic calculations for the 10 and 100 year flows would be required.

For questions regards these comments, contact Jason Swenson, Metro Water Resources, at jason.swenson@state.mn.us or 651-234-7539.

Permits:

In addition to the previously mentioned Drainage permit, an Access permit from the City will be required for the new street connection, and a Miscellaneous Work permit will be required for the removal of Bowers Drive. Any other use of, or work within or affecting, MnDOT right of way will also require a permit.

Permits can be applied for at this site: <https://olpa.dot.state.mn.us/OLPA/>. Please upload a copy of this letter when applying for any permits.

Please direct questions regarding permit requirements to Buck Craig of MnDOT's Metro Permits Section at 651-775-0405 or Buck.Craig@state.mn.us.

Review Submittal Options

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If you have any questions concerning this review, please contact me at (651) 234-7797.

Sincerely,



Cameron Muhic
Senior Planner

Copy sent via E-Mail:

Buck Craig, Permits
Mark Fairbrother, Water Resources
Anthony Wotzka, Area Engineer
Matthew Wernet, Surveys

Lance Schowalter, Design
Jason Swenson, Water Resources
Michael Lynch, Right-of-Way
Ashley Roup, Traffic

Mackenzie Turner Borgen, Multimodal
Natalie Ries, Noise
Russell Owen, Metropolitan Council

Jesse Thorsen, Multimodal
Jason Junge, Transit

March 11, 2021

Tim Gladhill, Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN 55303

RE: City of Ramsey - Environmental Assessment Worksheet (EAW) - Riverstone South
Metropolitan Council Review No. 22532-1
Metropolitan Council District No. 9

Dear Mr. Gladhill:

The Metropolitan Council received the EAW for the Riverstone South project in the City of Ramsey on February 2, 2021. The proposed project is located south of Highway 169 and east of Bowers Drive NW. The proposed development consists of 78.63 acres with 243 units comprising of 165 detached single-family homes and 78 detached townhomes, and parkland with tree preservation. Site development will include installation of municipal sewer and water, mass grading, and stormwater management practices.

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 9 – Land Use (Jerome Benner II, 651-602-1494)

The proposed development site is guided as Low Density Residential (LDR) in the City's 2040 Future Land Use Plan. As such, the allowed density range for this land use is 3 to 4 units per acre, which is consistent with the guiding land use for the proposed 165 detached single-family dwellings. The EAW states that a portion of the site will be reguided to Medium Density Residential (MDR), which allows for a density range of 4 to 6 units per acre, in order to accommodate the 78 townhomes proposed for this site at 7 units per acre. In addition to the land reguiding correctly identified in the Permits and Approvals section of the EAW (Item 8), the comprehensive plan amendment must also address consistency between the proposed density (7 units/acre) and permitted density ranges currently defined by land use categories. The proposed density is not currently permitted by any defined land use category. Furthermore, the comprehensive plan amendment must state the exact number of acres that would be reguided as a part of the amendment.

Item 9 – Land Use (Todd Graham, 651-602-1322)

The EAW site is a small part of TAZ #62 which is located along a 2-mile long strip of land between the Mississippi River and Highway 10. The City's 2040 Comprehensive Plan expects this zone to gain 524 households and 3,000 population during the 2020-2040 planning period. Should the Riverstone South development go forward, Council staff recommend reexamining the TAZ allocation, considering a larger number of

households. The Council and the City can modify the TAZ allocation at the time of the amendment described above.

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 Jerome Benner II, Principal Reviewer, at 651-602-1494.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Raymond Zeran, Metropolitan Council District 9
Eric Wojchik, Sector Representative
Jerome Benner II, Principal Reviewer
Reviews Coordinator

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March 8, 2021

Tim Gladhill
Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN 55303

Re: Riverstone South Environmental Assessment Worksheet

Dear Tim Gladhill:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Riverstone South project (Project) in the city of Ramsey, Anoka County, Minnesota. The Project consists of a new residential development. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

Water Resources (Item 11)

- Since the Project will disturb 50 acres or more and discharges to the Mississippi River, which has construction-related impairments and is also classified as a Scenic and Recreational and Restricted water, the Stormwater Pollution Prevention Plan (SWPPP) for the Project will require submittal to the MPCA prior to obtaining National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit (CSW Permit) coverage.
- The EAW does not discuss additional erosion and sediment control best management practices (BMPs) required during construction for special waters identified as restricted. The Project will need to implement parts 23.9, 23.10 and 23.11 of the CSW Permit and include the applicable requirements in the SWPPP. Please direct questions regarding CSW Permit requirements to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.
- The primary stormwater treatment for the Project appears to be the proposed ponds, including one pond referred to as a 26 foot deep “lake” to be constructed on the site. The Project proposer needs to be aware that the lake will not meet MPCA stormwater treatment system requirements. A pond constructed to treat stormwater can be no more than 10 feet deep per CSW Permit requirements. Any deeper and the stormwater pond will stratify and the bottom of the pond will lose all oxygen and become anoxic. Any phosphorus that is attached to the sediments that have settled out and are now on the bottom of the pond will be released and discharged during the next rain event. Also, a constructed stormwater pond built in an upland area would be considered a treatment facility and can’t be classified as a lake. The lake cannot serve as both a lake and a stormwater treatment pond.
- The CSW Permit requires that 1 inch of the water quality volume is treated via a volume reduction method, such as infiltration, unless site conditions prohibit per one of the reasons listed in the CSW Permit. A wet sediment pond is not a volume reduction practice. The EAW does include plans for infiltration basins, which should be the primary method of treating stormwater from the new impervious surfaces. Ponds that meet CSW Permit requirements can act as pre-treatment practices and extend the life of the infiltration basins. It is important to note that the infiltration “bench” shown on the Project plan may not meet the requirements of the CSW Permit if good soils are present and standard infiltration practices can be constructed. The MPCA recommends the Project

- designer contact MPCA construction stormwater engineering staff prior to submitting their permanent treatment plans to the MPCA. You may contact Mike Findorff at 651-757-2357 or Mike.Findorff@state.mn.us.
- The Project Proposer is strongly encouraged to utilize infiltration along with green infrastructure practices to mimic the natural hydrology of the site and reduce runoff. Examples include preservation of existing trees, maximizing open space, planting native vegetation instead of turf and a reduction in impervious area by constructing narrower streets and sidewalks or using permeable pavements. Stormwater can also be harvested and reused for irrigation. These practices can help to mitigate the cumulative effects of increasing development in the area and provide greater resilience to increasing extreme precipitation and manage downstream flooding. These practices also provide additional benefits in relation to climate change.

Noise (Item 17)

The MPCA appreciates the proposer's attention to construction and other noise for the Project. At this time, the MPCA feels that the considerations made by the Project proposer are sufficient, and that it is unlikely that there will be noise issues if the mitigation measures described on p. 29 of the EAW are included in the final site plans and buildout. For noise related questions, please contact Fawkes Char at 651-757-2327 or Fawkes.Char@state.mn.us.

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

Sincerely,

Karen Kromar

This document has been electronically signed.

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

KK:bt

cc: Dan Card, MPCA, St. Paul
Roberta Getman, MPCA, Rochester
Mike Findorff, MPCA, St. Paul
Fawkes Char, MPCA, St. Paul

From: [GraggJohnson, Kelly \(ADM\)](#)
To: [Tim Gladhill](#)
Subject: SHPO No. 2021-0893; Riverstone South EAW
Date: Tuesday, March 9, 2021 10:51:44 AM
Attachments: [image003.png](#)
[2021-0893.pdf](#)

Good Morning,

Here is the SHPO comment letter for the Riverstone South EAW. Please let me know if you have any questions.

Best Regards,

Kelly



Kelly Gragg-Johnson (she/her) | **Environmental Review Specialist**

State Historic Preservation Office

(651) 201-3285

kelly.graggjohnson@state.mn.us

The SHPO office is closed to visitors and unable to accommodate in-person research and deliveries. Mail is being delivered to the office via USPS, FedEx and UPS. Our office will continue to take file search requests via DataRequestSHPO@state.mn.us. Check [SHPO's webpage](#) for the latest updates and we thank you for your continued patience.

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