

**HOPKINS PLANNING & ZONING COMMISSION  
SPECIAL MEETING AGENDA  
Wednesday, October 14, 2020  
6:30 pm**

THIS AGENDA IS SUBJECT TO CHANGE  
UNTIL THE START OF THE PLANNING & ZONING COMMISSION MEETING

- I. **CALL TO ORDER**
- II. **ADOPT AGENDA**
- III. **NEW BUSINESS**
  - 1. Blake Road Station EAW
- IV. **ANNOUNCEMENTS**
- V. **ADJOURN**

DUE TO THE COVID-19 HEALTH PANDEMIC, THE PLANNING & ZONING COMMISSION'S REGULAR MEETING PLACE IS NOT AVAILABLE TO THE PUBLIC. MEMBERS OF THE PUBLIC WHO DESIRE TO MONITOR THE MEETING REMOTELY OR GIVE INPUT OR TESTIMONY DURING THE MEETING CAN FIND INSTRUCTIONS AT [www.hopkinsmn.com/virtualmeetings](http://www.hopkinsmn.com/virtualmeetings) OR BY CALLING CITY HALL AT 952-548-6342 (DURING NORMAL BUSINESS HOURS 8 AM TO 4:30 PM.)



# MEMO

To: Planning Commission Chair and Members

From: Andi Moffatt, Vice President of Environmental Services with WSB  
Jason Lindahl, City Planner

Date: October 14, 2020

Subject: Blake Road Station Environmental Assessment Worksheet (EAW)

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## **Proposed Action**

Move to adopt Planning & Zoning Commission Resolution 2020-08, recommending the City Council make a negative declaration of need regarding an Environmental Impact Statement for the Blake Road Station Development.

## **Overview**

Pursuant to Minnesota Rule 4410.4300, the City of Hopkins is the Responsible Government Unit (RGU) for the Environmental Assessment Worksheet (EAW) for the proposed Blake Road Station Development (Project). In this role, the City of Hopkins retained Andi Moffatt, Vice President of Environmental Services with WSB to review the EAW prepared by the developer's consultant, Kimley Horn. Per the City Code Article II - Environmental Review Program, after an EAW is prepared, the Planning & Zoning Commission shall review the EAW and recommend to the City Council whether it should require the preparation of an Environmental Impact Statement (EIS). The City Council shall require an EIS when it finds under Minnesota Rule 4410 that an action is major and has potential for significant environmental effects.

Based on the review of the project, reasonably expected environmental impacts, and the findings of fact and conclusions in this memo, it is our assessment that the project does not have the potential for significant environmental effects and that where there may be environmental impacts, they can be addressed through the permitting process. Through future land use review and permitting, the City can consider the information obtained in the EAW process and address mitigation measures as part of approvals or denials of a project. Therefore, staff recommends the Planning & Zoning Commission adopt the attached resolution recommending the City Council make a negative declaration of need regarding an Environmental Impact Statement for the Blake Road Station Development.

## **Attachments**

- Planning & Zoning Commission Resolution 2020-08
- EAW Appendix A – Comments Received
- EAW Appendix B – Response to Comments
- EAW Appendix C – Permits and Approvals Required
- EAW Appendix D – Supplemental Wastewater Information

## **Background**

The purpose of an EAW is to determine whether an Environmental Impact Statement (EIS) is needed. The EAW does not confer approval or denial of a project but rather is a tool to identify issues or impacts that can and cannot be addressed through the permitting process. An EAW was required to be prepared pursuant to Minnesota Rules 4410.4300, subpart 32 – Mixed residential and industrial projects.

The EAW analyzes a standard list of questions based on Minnesota Rule and guidance from the Minnesota Environmental Quality Board (EQB). The EQB is the State's organization that oversees the rules and implementation of Minnesota's environmental review process. The standard list of questions includes reviewing impacts to storm water quality and quantity, habitat, traffic, municipal infrastructure, soils, land use, and a few other topics as noted in the EAW. The full Blake Road Station EAW is available for review on the City's website by [clicking here](#).

## **EAW Review and Comment**

The EAW was provided to the required review agencies and made available to the public on the City's website for the required 30-day comment period beginning on August 31, 2020. The comment period ended September 30, 2020. No public hearing by the Planning & Zoning Commission or City Council is required as part of this process. Comments through the EAW process can help inform the permitting process and future steps for projects like this one. Eight comment letters were received during the comment period and are attached in Appendix A. These comments letters are from the state agencies and members of the public listed below.

- Minnesota Department of Natural Resources
- Minnesota Department of Transportation
- Minnesota Pollution Control Agency
- State historic Preservation Office
- Metropolitan Council
- Hennepin County
- Hopkins Community Housing Team
- Larry Hiscock, Hopkin Resident

The environmental review process requires RGU's to respond to substantive comments related to the required elements of the environmental review. Responses to comments have been prepared for Planning & Zoning Commission and City Council review and are attached in Appendix B.

## **Findings of Fact and Conclusion**

City staff has worked with our consultant, Andi Moffatt, Vice President of Environmental Services with WSB, to review the EAW prepared by the developer's consultant, Kimley Horn, and the comments received from various state agencies and members of the public. Based on this review and the criteria in Minnesota Rules, Part 4410.1700 and City Code Part III, Chapter 100, Article II – Environmental Review, the City makes the findings of fact listed below and concludes the project does not have the potential for significant environmental effects and EIS is not required for the Blake Road Station Development.

1. Trilogy Real Estate Group is proposing the redevelopment of 6.4 acres of existing commercial uses at the intersection of Excelsior Boulevard and Blake Road South in Hopkins, located

adjacent to the future METRO Green Line Blake Road Station. The proposed project is a multi-modal transit-oriented development that will be constructed in three phases starting in the spring of 2021. After the three phases are complete, the development will have up to 770 multi-family dwelling units, up to 19,000 square feet of retail, and up to 950 parking stalls.

2. An Environmental Assessment Worksheet (EAW) was required for the project in accordance with Minnesota Rules, part 4410.4300, subpart 32 (Mixed residential and industrial-commercial projects).
3. The City of Hopkins is the Responsible Governmental Unit (RGU).
4. The EAW was prepared using the form approved by the Minnesota Environmental Quality Board in accordance with Minnesota Rules, part 4410.1300.
5. The EAW is incorporated by reference in this Record of Decision.
6. The EAW was published in the *EQB Monitor* on August 31, 2020. The EAW was sent to all persons on the EQB Distribution List and was posted on the City's website.
7. The 30-day public review and comment period opened on August 31, 2020 and ended on September 30, 2020. Eight comment letters were received and are included in Appendix A.
8. Based on the comments received, the City does not find any corrections are necessary to the EAW.
9. The proposed project does not have the potential for significant environmental effects based on the above findings and the evaluation of the following four criteria per Minnesota Rules, part 4410.1700, subpart 7:
  - a. Type, extent, and reversibility of environmental effects
  - b. Cumulative potential effects
  - c. Extent to which the environmental effects are subject to mitigation on ongoing public regulatory authority
  - d. 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 Environmental Impact Statements (EISs)

**CITY OF HOPKINS, MINNESOTA  
HENNEPIN COUNTY, MINNESOTA**

**PLANNING & ZONING COMMISSION RESOLUTION 2020-08**

**A RESOLUTION RECOMMENDING THE CITY COUNCIL MAKE A NEGATIVE  
DECLARATION OF NEED REGARDING AN ENVIRONMENTAL IMPACT  
STATEMENT FOR THE BLAKE ROAD STATION DEVELOPMENT**

**WHEREAS**, the City of Hopkins prepared an Environmental Assessment Worksheet (EAW) for the Blake Road Station Development pursuant to Minnesota Rules 4410; and

**WHEREAS**, the EAW was distributed to the agencies and public for the required 30-day comment period August 31, 2020; and

**WHEREAS**, the 30-day comment period ended on September 30, 2020; and

**WHEREAS**, the preparation of the Blake Road Station EAW and comments received on the EAW have generated information adequate to determine whether the proposed project has the potential for environmental impacts; and

**WHEREAS**, the EAW has identified areas where the potential for environmental effects exist, but appropriate measures have or will be incorporated into the project plan and/or permits to reasonably mitigate these impacts; and

**WHEREAS**, the development is expected to comply with all the City of Hopkins and review agency standards; and

**WHEREAS**, based on the criteria established in Minnesota Rules 4410.1700 and the Findings of Fact and Conclusions, the project does not have the potential for significant environmental effects; and

**WHAREAS**, as required by City Code Part III, Chapter 100, Article II – Environmental Review, the Planning & Zoning Commission of the City of Hopkins reviewed all the information in the staff memo dated October 14, 2020 and agreed with the findings detailed in the staff memo; and

**NOW, THEREFORE, BE IT RESOLVED**, that the Planning & Zoning Commission of the City of Hopkins hereby recommends the City Council of the City of Hopkins make a negative declaration of need regarding an environmental impact statement for the Blake Road Station Development.

Adopted this 14<sup>th</sup> day of October, 2020.

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Gerard Balan, Chair

# Appendix A

## Comments Received

# **Appendix B**

## **Response to Comments**

Commenter	Comment	Response
Minnesota Department of Natural Resources	<p>Page 5, Table 4. This table in the EAW should acknowledge that there may be a need for a DNR Water Appropriation Permit should there be a need for construction dewatering of surface water or ground water in volumes that exceed 10,000 gallons per day, or one million gallons per year. This include construction dewatering for placing new utilities to the site, constructing footings for the new buildings, or grading the site.</p>	<p>Under Item 11.b.iii. the EAW states that if dewatering is required for construction, a permit will be obtained from the DNR. The dewatering permit has been added to the permits and approvals table in Appendix C.</p>
	<p>Page 8, Groundwater. The site is located within the Drinking water Supply Management Area of the City of Edina. Pollutants that are spilled in this area will be in the drinking water of the City of Edina within ten years. Potential groundwater pollutants should be handled carefully.</p>	<p>A spill prevention plan will be developed, and proper spill prevention controls will be in place for any vehicle refueling or maintenance that occurs on site during construction.</p>
	<p>Page 9, Stormwater. The large amount of impervious surfaces within the project area will require the use of winter road salt. 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. The runoff from this development flows to Minnehaha Creek, which is already impaired from excess chloride levels. 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 <a href="#">website</a>. 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.</p>	<p>The project proposer will look for ways to minimize chloride use and improve treatment of stormwater runoff to minimize potential impacts to downstream waters. The project will comply with all city, watershed district, and state rules for stormwater management and will prepare a Stormwater Management Plan that will be reviewed by the city and watershed district.</p>

Commenter	Comment	Response
	<p>Page 17, Transportation. If the parking spaces beneath the buildings need to be dewatered on a permanent basis, and the volumes exceed 10,000 gallons per day, or one million gallons per year, then a DNR Water Appropriation Permit is required for the dewatering.</p>	<p>If permanent dewatering is required and volumes exceed 10,000 gallons per day or one million gallons per year, a DNR Water Appropriation Permit will be obtained. The dewatering permit has been added to the permits and approvals table in Appendix C.</p>
	<p>The DNR concurs with the EAW's assessment that there are no known occurrences of rare features within a one-mile radius of the proposed project.</p>	<p>Comment noted.</p>
<p>Minnesota Department of Transportation</p>	<p>Consider using raised crossings to slow vehicles and provide a more intact pedestrian realm. Consider utilizing driveways entries similar to MnDOT Standard Plan 5-297.254 that indicate clear ROW priority for sidewalk users and maintain an adequate pedestrian access route.</p>	<p>The project proposer will evaluate using a raised crossing to slow vehicles entering the project site. These details will be finalized as design progresses.</p>
	<p>MnDOT recommends that "Inverted-U" or "Post and ring" type bike racks be utilized for the short term bicycle parking as highlighted in the precedent imagery. Renderings appear to show spiral type bike racks which have some functional downsides such as users needing to lift their bikes over the bottom of the rack.</p>	<p>The project proposer will evaluate the potential to utilize "inverted-U" or "post and ring style" bike racks for the development. These details will be finalized as design progresses.</p>
<p>Minnesota Pollution Control Agency</p>	<p><i>Wastewater</i></p> <p>Item 11.b. states an approximate flow of 212,900 gallons per day. A table itemizing the different land use types, number of units, and design flow per unit should be added.</p> <ul style="list-style-type: none"> <li>• Design wastewater flow calculations should be included for both average daily flow and peak flow.</li> </ul>	<p>Based on the Metropolitan Council's Sewer Available Charge determination standards for the proposed improvements with the proposed uses, the maximum wastewater flows are projected to be approximately 212,900 gallons per day (gpd) at full buildout over the next 10 years. The average daily flow is assumed to be approximately 53,225 gpd. The existing site consists of three retail buildings totaling</p>

Commenter	Comment	Response
	<ul style="list-style-type: none"> <li>An estimate of the actual current flows would also be useful to better describe if there is an increase in flow expected.</li> </ul> <p>The direction of flow, and general sewer route to the wastewater treatment plant (WWTP) should be mapped.</p> <p>The design capacity, current flow, and capacity after the redevelopment should be shown for sewers downstream to the WWTP.</p> <p>Item 11.b. states that flow increases to the lift station serving the site would likely require improvements to the lift station. If flow increases are expected from the proposed Project, a brief description of the necessary lift station improvements should be included.</p> <p>The capacity of the WWTP and capability to accept this increased flow should be discussed.</p>	<p>approximately 95,300 square feet, which equates to 8,561 gpd maximum daily load and 2,140 average daily load.</p> <p>The sanitary sewer service will be provided by the City of Hopkins. The existing system currently has the capacity to handle the increase in wastewater generated by this type of development based on coordination with the City’s Public Works Department. A sewer line to service the three buildings will be stubbed off of the existing sanitary main in Excelsior Boulevard. An existing public sanitary sewer lift station exists in an easement on the south side of the project site, adjacent to Excelsior Boulevard; however, this lift station will not be impacted by the proposed development. The new sewer services will connect out into a gravity main in Excelsior Boulevard such that they will not connect to the lift station. Manholes will be provided every 200 feet to provide access to the main line on the project site for serviceability and monitoring.</p> <p>The project site will be served by the publicly owned Metropolitan Council Metro Wastewater Treatment Plant in Saint Paul. The plant currently treats approximately 172 million gpd, with a total capacity of up to 251 million gpd according to the Metropolitan Council Environmental Services Publications and Resources. Based on the Sewer Availability Charge Guidelines, the estimated wastewater from the proposed mixed-use</p>

Commenter	Comment	Response
		<p>development is anticipated to consist primarily of normal domestic sewage. The 10-year plan is expected to generate approximately 212,900 gpd (0.213 million gpd). The Metro Wastewater Treatment Plant can treat the volume and composition of wastewater generated by the proposed project without pretreatment or other plant facility improvements.</p> <p>The average daily and peak flow information is included in Appendix D.</p>
	<p><i>Stormwater</i></p> <p>The Project is a re-development with plans to install raingardens and an underground filtration system for stormwater treatment. The site is currently impervious with green space to be added. The MPCA encourages the Project proposer to also incorporate trees, perhaps in the form of tree trenches, into the site plan to help mitigate stormwater runoff.</p> <p>Because the site will discharge to an impaired water within one mile, the EAW should include the additional best management practices, such as stabilizing soils immediately and within seven days, which will be required by the National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit.</p>	<p>The proposed project will include boulevard trees and other plantings within the project site. The project proposer and the City will evaluate if tree trenches can be incorporated into the site design.</p> <p>The EAW states that the project will require a National Pollutant Discharge Elimination System (NPDES) permit. A Stormwater Pollution Prevention Plan (SWPPP) will be developed in accordance with the NPDES permit and will include best management practices such as stabilizing soils immediately and within seven days.</p>

Commenter	Comment	Response
	<p><i>Contamination/Hazardous Materials/Wastes</i></p> <p>The Phase II Environmental Site Assessment determined the presence of contamination at the Project site. The MPCA recommends the Project be enrolled in the MPCA Brownfields Program to obtain the necessary technical assistance in managing the contamination. Information regarding the Brownfields Program can be found at: <a href="https://www.pca.state.mn.us/waste/brownfields">https://www.pca.state.mn.us/waste/brownfields</a>.</p> <p>Please note that for petroleum spills that are five or more gallons, the Project proposer or their contractors are required to contact the State Duty Officer at 651-649-5451 or 800-422-0798. Information on reporting spills and leaks is available on the MPCA website at: <a href="http://www.pca.state.mn.us/index.php/view-document.html?gid=2807">http://www.pca.state.mn.us/index.php/view-document.html?gid=2807</a>.</p>	<p>The project proposer will work with MPCA regarding contamination and cleanup of the project site as the site is redeveloped.</p> <p>If a petroleum spill of five or more gallons occurs on site during construction, the State Duty Officer will be contacted as required.</p>
	<p><i>Noise</i></p> <p>The MPCA appreciates the discussion of noise in this EAW but would like to add some comments.</p> <ul style="list-style-type: none"> <li>• Though the City of Hopkins has some noise-related ordinance language, particularly exempting construction noise, the Project is still subject to the state noise standards defined at Minn. R. ch. 7030.</li> <li>• Although construction noise is temporary in nature, we typically recommend that construction activities take place during daytime hours (7:00 am to 10:00 pm), and that construction equipment be muffled, as appropriate.</li> </ul>	<p>The City and project proposer acknowledge that the project is subject to state noise standards.</p> <p>Equipment will be muffled as appropriate and the contractor will consider other measures to further minimize noise during construction.</p>

Commenter	Comment	Response
	<ul style="list-style-type: none"> <li>At this time, it seems unlikely that there will be any long-term impacts (additions) to area noise from the Project post-construction. Increased local traffic, light rail trips, and other retail uses, however, may impact the noise levels both current and future residents experience in the area. So long as the multi-family dwellings are constructed to attenuate noise appropriately (as suggested in the EAW), there should be no reason to believe tenants will experience levels of noise above the state standards while in their homes.</li> </ul>	
State Historic Preservation Office	<p>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 properties in the area that will be affected by this project.</p> <p>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.</p>	Comment noted.

Committer	Comment	Response
Metropolitan Council	<p>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.</p> <p>We offer the following comments for your consideration.</p>	Comment noted.
	<p><i>Item 9b – Planned Land Use</i></p> <p>Although no change in guiding land use is necessary, the project would result in greater development than the City’s 2040 comprehensive plan anticipated. The project is located in the southeast corner of Transportation Analysis Zone (TAZ) 1407, where the City’s comprehensive plan allocated a gain of 673 jobs and a loss of 50 households by 2040. In contrast, the project as proposed would result in as many as 770 housing units, which are anticipated to be built in phases through 2031. This compares to a citywide forecasted growth of only 800 households from 2020-2040.</p> <p>Should development proceed and outpace forecasted growth, the Council expects that the City initiate a commensurate forecast increase through a comprehensive plan amendment. The City could include the forecast adjustment as part of an unrelated comprehensive plan amendment or submit the amendment separately. The Council recommends that the City request to increase its official forecasts by 800 households and 1,700 population, with assignment of this growth to TAZ 1407. Please be advised that a future forecast increase for the 2021-2030 decade will result in an increase in the City’s allocation of affordable housing need.</p>	The City will continue to monitor growth in the vicinity and will coordinate with the Metropolitan Council accordingly.

Commenter	Comment	Response
	<p><i>Item 11b – Stormwater</i></p> <p>Council staff recommends that the developers and the City consider the utilization of green roofs and biosolar (green roof + solar) systems as stormwater BMP features integrated with proposed ground-level stormwater BMPs.</p> <p>MPCA’s online “Stormwater Manual,” which offers guidance for designing and calculating stormwater retention and detention values:  <a href="https://stormwater.pca.state.mn.us/index.php/Green_roofs">https://stormwater.pca.state.mn.us/index.php/Green_roofs</a></p> <p>The Council’s “Surface with Purpose” tool offers technical assistance for projecting green roof stormwater retention capabilities:  <a href="https://metrocouncil.org/Communities/Planning/Local-Planning-Assistance/Solar/Surface-with-Purpose-Interactive.aspx">https://metrocouncil.org/Communities/Planning/Local-Planning-Assistance/Solar/Surface-with-Purpose-Interactive.aspx</a></p>	<p>The project proposer states they will evaluate the potential for incorporating green design elements into the proposed project design and the buildings will be designed to be rooftop solar ready. The City strongly recommends the project proposer incorporate any such items into their land use application. Such items would help support the project proposer’s request for a Planned Unit Development (PUD) approval.</p>
	<p><i>Item 12 – Contamination/Hazardous Materials/Waste</i></p> <p>The site lies within the Drinking Water Supply Management (DWSMA) for the city of Edina and is near the Emergency Response Area (ERA) for Edina wells numbered 12 and 13. ERAs are equivalent to the one-year time of travel to these wells. While any contamination at the development site is unlikely to immediately impact the City of Edina’s drinking water supply, it would be useful for the City of Hopkins to coordinate wellhead protection activities with the City of Edina. The TCE detected on site is a concern. Proper tracking and removal of detected contamination to limit any mobilization that may impact drinking water sources is essential. Hopkins may also want to consider a chloride management plan for the site to</p>	<p>The City of Hopkins will continue to monitor and coordinate wellhead protection activities with the City of Edina.</p> <p>Water demand calculations are included in Appendix D. City staff has concluded that the existing domestic water system has capacity for the proposed project demand.</p>

Commenter	Comment	Response
	<p>limit any potential impacts of road salt on groundwater and surface water resources.</p> <p>Potential impacts of the development on water demand for the City of Hopkins are not discussed in the EAW. The site proposes 752 additional multi-family housing units. If the current estimated persons per household for the City are applied to this site, an estimated 1,579 residents may be added at capacity. The Hopkins Local Water Supply Plan, which is part of the City's 2040 comprehensive plan, estimates an additional 1,800 people to be added to the City's serviced population by 2040, the majority of which would be part of the Blake Road Station Development. Although increased demand of this magnitude is unlikely to dramatically impact the City's drinking water resources or infrastructure, it would be useful to consult with the Hopkins utility staff to ensure that demand can be met and that water use efficiency is considered a priority for the site. Council staff recommend that any irrigated land that is included on the site be controlled by smart irrigation technology that considers local rainfall and temperature data to limit the need for outdoor water during the summer months, when groundwater resources may be the most stressed.</p>	
	<p><i>Item 16a – Stationary Source Emissions</i></p> <p>The EAW states: <i>"No stationary source emissions are anticipated; therefore, no mitigation is required."</i> However, the project will utilize boilers, exhaust stacks, natural gas, and electricity. All of these are sources of greenhouse gas emissions and air pollutants. In the response to Item 20, the EAW states: <i>"The project will enroll in the Xcel Energy</i></p>	<p>Comment noted. As stated, the project will enroll in the Xcel Energy Design Assist (EDA) program to optimize energy design strategies. Energy efficiency with performance functionality will be aggressively deployed to achieve sustainable conservation and ongoing reduction of the project's carbon footprint. Rain gardens, solar</p>

Commenter	Comment	Response
	<p><i>Design Assist (EDA) program to optimize energy design strategies. Energy efficiency with performance functionality will be aggressively deployed to achieve sustainable conservation and ongoing reduction of the project's carbon footprint.</i> Council staff encourage revising the response to include the mitigation efforts planned.</p>	<p>ready rooftops, and energy efficient buildings will be designed and constructed for the proposed development.</p>
	<p><i>Item 16b – Vehicle Emissions</i></p> <p>The EAW states: “Motor vehicles emit a variety of air pollutants including carbon monoxide (CO), hydrocarbons, nitrogen oxides, and particulates.”</p> <p>As also recommended above under Item 11b, Council staff recommends that the developers and the City consider the utilization of green roofs and biosolar (green roof + solar) systems as stormwater BMP features integrated with proposed ground-level stormwater BMPs. Increasing rooftop vegetation leads to decreased ambient temperature, decreased energy use, and directly removes NO<sub>2</sub>, all of which reduce the formation of ozone and mitigates for the air pollutants and emissions this development will increase or introduce to this site. Please see links to the MPCA and Council resources identified above under Item 11b.</p> <p>Council staff recommends the adoption and integration of either electric vehicle charging infrastructure, or electric vehicle-ready charging infrastructure, to complement the TOD nature of this development, and to mitigate for those vehicle emissions. Guidance can be found in the Great Plains Institute’s “Becoming Electric Vehicle Ready” guideline document. Such actions would be in direct</p>	<p>The buildings will be designed to accommodate rooftop solar. Electric vehicle charging stations will also be installed as part of the development. The City strongly recommends the project proposer incorporate any such items into their land use application. Such items would help support the project proposer’s request for a Planned Unit Development (PUD) approval.</p>

Commenter	Comment	Response
	<p>support of the following policies in the City's 2040 comprehensive plan:</p> <ul style="list-style-type: none"> <li>• GOAL 4: Protect and improve indoor and outdoor air quality <ul style="list-style-type: none"> <li>○ Support a reduction in vehicle emissions by improving travel efficiency and promoting non-auto modes of transportation, including walking, biking, and public transportation alternatives.</li> <li>○ Support expanded use of vehicles that do not rely on fossil fuels.</li> <li>○ Foster air quality improvements to preserve the natural environment and sustain community health and enjoyment.</li> <li>○ Expand use of energy-efficient and alternative fuel vehicles, including through the city fleet.</li> </ul> </li> </ul>	
	<p><i>Item 18a – Transportation</i></p> <p>Metro Transit appreciates the City's and the developer's continued engagement to ensure that the project is integrated with, and meets the needs of, future transit service including the METRO Green Line.</p>	<p>Comment noted.</p>
	<p><i>Item 20 – Other Potential Environmental Effects</i></p> <p>The proposed development increases the existing urban heat island (UHI). The development would slightly decrease the site's impervious surface footprint (8%) but more than triple the thermal mass of concrete from three 1.5-story buildings to three 7-story buildings (proposed). Doing so increases the demand on the electrical grid to meet cooling load requirements, increases the cost of</p>	<p>The project proposer will work with the City of Hopkins on additional resiliency efforts to be incorporated into the project if they are deemed financially feasible. The buildings will be designed to be rooftop solar ready. Electric vehicle charging stations will also be installed as part of the development. The City strongly recommends the project proposer incorporate any such items</p>

Commenter	Comment	Response
	<p>operating due to higher cooling load demands, and increases the volume of NO2 and ozone formation.</p> <p>Council staff recommends that the developers and City consider mitigation of UHI effects by installing green roofs, vertical green walls (example: Mozaic Art Park Ramp’s eastern exterior wall), cool roofs, planting and maintaining trees, incorporating trees into site design, and constructing cool, reflective, and permeable pavements (See Metropolitan Council, “Keeping Our Cool: Extreme Heat in the Twin Cities Region”).</p> <p>Council staff recommends that the developers and City consider integrating solar panels, BioSolar systems, solar-ready construction, or green roof-ready construction into the design of the proposed buildings. Solar panels may be sited on the roof and exterior walls of the buildings. The City may look to the rooftops of The Liberty Apartments complex in Golden Valley as a current example. If the site is not suitable for on-site solar development, the developers may pursue a subscription to a Community Solar Garden through the cost-free technical assistance provided by programs like GreenStep Cities, SolSmart, and CERTs. Such actions would be in direct support of the following policies in the City’s 2040 comprehensive plan:</p> <ul style="list-style-type: none"> <li>• GOAL 2: Reduce the overall disposal of solid waste and increase reuse and recycling to conserve environmental resources <ul style="list-style-type: none"> <li>○ Support the development and use of renewable energy sources in Hopkins, including solar, wind, geothermal, biomass, and other alternatives.</li> </ul> </li> </ul>	<p>into their land use application. Such items would help support the project proposer’s request for a Planned Unit Development (PUD) approval.</p>

Commenter	Comment	Response
	<ul style="list-style-type: none"> <li>○ Promote balance between the benefits of urban forests and the benefits of enabling solar development.</li> <li>○ If opportunity arises, participate in the creation of local community solar gardens for residents and businesses who have limited on-site solar resources or do not own land or buildings, on sites such as the landfill.</li> <li>○ Encourage development projects to evaluate on-site solar opportunities and incorporate solar system installation into designs.</li> </ul>	
Hennepin County	<p>Hennepin County transportation has reviewed the above document, along with the traffic study again.</p> <p>We had previously reviewed and discussed our comments to the traffic study with the city and your consultant, and have no additional comments to make at this time.</p> <p>I understand that discussions regarding the right-in right-out access on both Blake Road and Excelsior Blvd continue, and that the county and Hopkins are continuing to plan for turning back Blake Road to the city.</p>	Comment noted. Coordination with Hennepin County regarding access and roadway jurisdiction will continue.
Hopkins Community Housing Team	Thank you for this opportunity to provide comment on the Environmental Assessment Worksheet (EAW) for the proposed Blake Road Station development. We are deeply concerned that the draft proposal and the EAW fail to take into consideration “vulnerable populations” adjacent to the development as well as the displacement of neighborhood-serving and minority-owned businesses, will accelerate increasing rents displacing long-time	Minnesota administrative rules govern the required elements of an EAW and the Minnesota Environmental Quality Board (EQB) publishes a standard form for the preparation of an EAW. The EAW was prepared in accordance with state rules and EQB guidelines. Environmental justice

Commenter	Comment	Response
	<p>neighbors and community-serving businesses, and that the cumulative impact of this project with the 325 Blake Road development and other potential developments in the Blake Road station area will be harmful to a surrounding neighborhood that fits the definition of an Environmental Justice Community. Additionally, we are concerned that more could be done to engage the surrounding neighbors to understand the opportunity and the consequences, and to inform the community of potential mitigation measures.</p> <p>As documented by the Southwest Corridor-wide Housing Inventory completed by Hennepin County’s Southwest LRT Community Works, housing in the Blake Road station area of Hopkins is primarily naturally occurring affordable housing. This report counts 16 multi-family rental developments (of 12+ units) within the Blake Road station area in Hopkins. For the 13 (out of 16) market-rate properties for which rents were known at the time of the study, all are affordable at 60% AMI or less, with most affordable at 50% AMI.</p> <p>According to the Housing Inventory, “the Blake Road station area had the highest population with nearly 5,400 persons” within a half-mile radius. The report also notes that the Blake Road station area has one of the highest populations of people of color (52%), the highest percent (26%) of people 19 years old and younger, and was one of only four that averaged over two people per household.</p> <p>While housing in the Blake Road neighborhood has provided a more affordable place to live for many Hopkins residents, with much of this housing being market-rate,</p>	<p>analysis is not required for projects without federal funding or approvals.</p> <p>State administrative rules also include standards and criteria for the decision on the need for an Environmental Impact Statement (EIS), based on the potential for significant environmental effects. State rules defines environment as land, air, water, minerals, flora, fauna, ambient noise, energy resources, and artifacts or natural features of historic, geologic, or aesthetic significance. Through the EAW, it was determined that the project does not pose a potential for significant environmental effects, therefore an EIS is not warranted.</p> <p>As stated in the EAW, the site located at 325 Blake Road was purchased by the Minnehaha Creek Watershed District (MCWD) in 2011 with the intent to use 4 to 6 acres of the site for stormwater management and use the remaining land for redevelopment. MCWD and the City of Hopkins have been working together to prepare the site for redevelopment and anticipate going out for developer selection in the near future, with the intent for redevelopment to begin in 2021. The City has not yet approved a redevelopment plan for the 325 Blake Road site; however, as indicated in the 2040 comprehensive plan, the site is zoned for an Activity Center. After a development proposal is submitted for this site,</p>

Commenter	Comment	Response
	<p>there is no guarantee that the rental prices will remain at more affordable levels into the future. As new market-rate buildings like the proposed Blake Road Station development arrive in the neighborhood, nearby properties, both housing and commercial, will face increasing pressure.</p> <p>Therefore, our concerns regarding the EAW include the following:</p> <ol style="list-style-type: none"> <li>1. The proposal and EAW do not reflect the City of Hopkins' expressed commitment to racial, cultural, and economic diversity nor the priority of racial equity referenced in the 2040 Comprehensive Plan,</li> <li>2. The proposal and the EAW do not reflect community-wide input supporting affordable housing, fears of gentrification, nor the priorities of adjacent neighborhood residents stating that affordable housing is their top priority,</li> <li>3. The proposal and the EAW do not address the displacement of neighborhood and community-serving businesses, the displacement of minority-owned businesses, nor the priorities expressed by adjacent neighborhood residents for access to such businesses,</li> <li>4. The EAW is incomplete because it does not perform a Cumulative Potential Effect analysis of the proposed development on the vulnerable populations immediately adjacent to the development. Nor does it consider the CPE of both the Blake Road Station development and 325 Blake Road on the surrounding vulnerable populations.</li> </ol>	<p>the project will be addressed via the regulatory permitting and approval processes and will be individually mitigated to ensure minimal cumulative impacts occur.</p> <p>Public comment on the proposed project has been solicited in multiple ways. The project proposer created a project website (<a href="https://blakeroadstationdevelopment.com">https://blakeroadstationdevelopment.com</a>) in June 2020 with project information and a method for contacting the developer to ask questions and provide comments. The project proposer has met with community groups upon request.. The City has also provided information about the proposed project on their website, including the concept plan and EAW. The City is following the required process for public review for the environmental document, and additional opportunities for commenting on the proposed project are available as part of the land use application review.</p>

Committer	Comment	Response
	<p>5. And we are concerned that the adjacent community that will be most burdened by the project are unaware of the proposed project, the impacts, potential mitigation measures nor the opportunity to comment on the EAW.</p> <p>Given these concerns, we request the following:</p> <ol style="list-style-type: none"> <li>1. That a supplemental Cumulative Potential Effects analysis be conducted to understand the impacts on the surrounding community that stand to be disproportionately burdened and meet the definition of an Environmental Justice community. The CPE must also include mitigation measures.</li> <li>2. A full Environmental Impact Assessment be conducted with a focus on the social and economic impacts this proposed development along with the other significant Transit Oriented Developments in the station area will have on existing affordable housing and on low and moderate income households. Low and moderate income households were to be key beneficiaries of the METRO Green Line Extension in the form of affordable, reliable transportation to regional employment centers. The benefit of the line is lost if they are displaced to communities lacking public transportation.</li> <li>3. Extend the comment period to allow for additional public comment and for the City of Hopkins to distribute flyers to the affected community soliciting further input and/or host a socially distant event outdoors to educate the community and gather further comment.</li> <li>4. That the City of Hopkins and developer conduct a racial impact analysis to minimize burdens and maximize</li> </ol>	

Commenter	Comment	Response
	benefits for low-income communities and Black, Indigenous and Communities of Color.	
Larry Hiscock	<p>Thank you for the opportunity to provide comment on Environment Assessment Worksheet (EAW) for the proposed Blake Road Station Development. I have been a strong advocate for the METRO Green Line Extension for over 10 years because of the potential to build a competitive region through economic growth and reducing inequities. A key opportunity to reduce entrenched racial and economic disparities in our region is through Equitable Transit Oriented Development. Extensive work was done in the planning process to engage environmental justice communities and make recommendations to address regional disparities. I am deeply concerned that the EAW does not provide cumulative impact analysis of the potential benefits and burdens experienced by “vulnerable populations” or environmental justice communities.</p> <p>The Environmental Assessment Worksheet (EAW) is incomplete by not including a Cumulative Potential Effects (CPE) analysis taking into consideration the economic, social and environmental effects of the development on minority-owned business, renters, low-to-moderate income people, and people of color. Additionally, the EAW does not consider the cumulative impact of both the Blake Road Station development and the potential redevelopment of 325 Blake Road site. The analysis should look at benefits, burdens, impacts on social determinants of health, displacement of existing businesses and future</p>	<p>See response above regarding public comment opportunities, environmental justice, 325 Blake Road and the need for an EIS.</p> <p>Other comments not related to EAW requirements will be addressed outside of the environmental review process in a separate letter to the commenters including affordability, commercial uses and racial equity.</p>

Commenter	Comment	Response
	<p>displacement as a result of increased property values along with mitigation measures.</p> <p>The benefits of a \$2 billions public investment in the METRO Green Line must extend beyond creating private value for property owners and amenities for individuals that can afford to live near the line. A key justification for the line was its ability to connect low- and moderate-income people to employment centers, produce affordable housing and build healthy communities accessible to all. City of Hopkins is already experiencing gentrification and the METRO Green Line Extension will accelerate the process.</p> <p>Questions and Requests for the Responsible Government Unit:</p> <ol style="list-style-type: none"> <li>1. How was input gathered from community and specifically environmental justice communities in the surrounding area? How many individuals from the immediate community provided feedback on the EAW.</li> <li>2. Formally, I request that a full environmental justice analysis be conducted looking at the cumulative impacts of this projects and nearby projects will have on social determinants of health, benefits/burdens, future displacement of existing businesses and residents as a result of increased property values along with mitigation measures.</li> <li>3. An additional request is for more engagement of the surrounding community that is directly impacted by this development. Extending the comment period should be included.</li> </ol>	

Commenter	Comment	Response
	<p>4. Request: That the City of Hopkins and developers use the Equitable Development Scorecard and/or the GARE Racial Equity Tool to maximize benefits and mitigate burdens for communities experiencing racial disparities.</p> <p>5. The Hopkins 2040 Plan explicitly references equity, inclusion and affordable housing strategies. What effort will be made to ensure this development will advance those goals?</p> <p>6. This project alone will have a transformative impact on the area and will have a catalytic effect on the surrounding market. Another significant development is being considered at 325 Blake Road. Will a full Environmental Impact Statement be conducted? The significance of the project appears to warrant additional analysis.</p>	

# Appendix C

## Permits and Approvals Required

*Permits and Approvals Required*

<b>Unit of Government</b>	<b>Type of Application</b>	<b>Status</b>
Minnesota Department of Health	Watermain permit	To be applied for
Minnesota Department of Labor and Industry	Plumbing permit	To be applied for
Minnesota Department of Natural Resources	Water appropriation permit	To be applied for, if needed
Minnesota Pollution Control Agency	National Pollutant Discharge Elimination System (NPDES) permit	To be applied for
Minnehaha Creek Watershed District	Stormwater permit	To be applied for
Hennepin County	Right-of-way permit	To be applied for
	Driveway permits	To be applied for
City of Hopkins	Planned unit development (PUD) and site plan approval	To be applied for
	Rezoning	To be applied for
	Building permits	To be applied for
	Demolition permit	To be applied for
	Erosion control, grading, and stormwater permit	To be applied for
	Right-of-way permit	To be applied for
	EIS need decision	In process
	Traffic Impact Analysis	In process; to be updated as needed through permitting and PUD process
Preliminary and final plat	To be obtained, if needed	

# Appendix D

## Supplemental Wastewater Information

Blake Excelsior Estimated Flow based on SAC Determination Guidelines

Proposed	Unit/SF	SF	SAC
Retail	19,000	3050	7
Residential	770	1	770
Total SACS			777
1SAC = 274 gpd			274
Maximum Total Estimated Flow (gpd)			212898
Average - Factor of 4 (gpd)			53225

Existing	Unit/SF	SF	SAC
Retail	95,298	3050	31
Residential	0	1	0
Total SACS			31
1SAC = 274 gpd			274
Maximum Total Estimated Flow (gpd)			8561
Average - Factor of 4 (gpd)			2140