



REQUEST FOR CITY COUNCIL ACTION

Agenda Date: 05/11/2015
Agenda Item: 14.e

Department Approval

V. Paul Bette

City Manager Approval

Samuel Truogler

Item Description: Request by the Community Development Department to approve the Roseville Environmental Review Worksheet related to the HR LLC (TPI Hospitality) project at 2750 Cleveland Avenue

BACKGROUND

1 On December 8, 2014, the City Council approved the Roseville Environmental Review
2 Worksheet (ERW) as the replacement for the voluntary Environmental Assessment Worksheet
3 (EAW) process that was previously required for all projects within the Twin Lakes
4 Redevelopment Area. The ERW is similar to the EAW in its provision of project details and
5 environmental considerations and is administered by the Planning Division.
6 On March 11, 2015, the Planning Division received the HR LLC (TPI Hospitality) ERW related
7 to the hotel developments at 2750 Cleveland Avenue (Attachment A). The ERW was emailed to
8 appropriate staff at the U.S. Fish & Wildlife Service (FWS), Minnesota Pollution Control
9 Agency (MPCA), Minnesota Department of Natural Resources (DNR), and the Ramsey County
10 Traffic Engineer.
11 DNR and FWS replied that they had no comment after their review of the ERW. The Ramsey
12 County Traffic Engineer commented that the County's main concern is the proposed right
13 in/right out access to Cleveland Avenue and that County representatives have met with the
14 developer and have denied access to Cleveland Avenue. Therefore, page 4 of the Environmental
15 Review Document should reflect the access denial. The MPCA provided a review similar in
16 nature to an EAW review (Attachment B) and asked for more general information and/or
17 clarification. The MPCA did not request additional environmental analysis or investigation.
18 The project is still required to proceed through the appropriate MPCA environmental clean-up
19 approval process. Other comments from the MPCA were alerting the applicant to requirements
20 related to storm water treatment and erosion control that will be addressed by the City Engineer
21 and the Rice Creek Watershed through the approval of construction plans.
22 Given the comments from the MPCA, the City Planner requested the applicant respond to a
23 number of the MPCA comments; those responses are attached (Attachment C).

PLANNING DIVISION RECOMMENDATION

25 Per Resolution 11198 the City Council is required to approve the ERW in order to allow staff to
26 issue permits related to the project. Since none of the agencies contacted have indicated a need
27 for additional environmental review and identified no significant issues, the Planning Division is
28 recommending that the City Council acknowledge the information provided in the HR LLC (TPI
29 Hospitality) ERW and the applicant's response to the MPCA's comments meet this requirement,
30 thus allowing staff to begin the process of issuing permits related to the project.

31

32 **SUGGESTED CITY COUNCIL ACTIONS**

33 By Motion, accept the HR LLC (TPI Hospitality) ERW and the applicant's responses to MPCA  
34 comments as satisfying the ERW requirements established in Resolution 11198 and direct staff  
35 to approve permits when such necessary information and project details comply with City and  
36 State Codes.

**Prepared by:** City Planner Thomas Paschke - 651-792-7074 | [thomas.paschke@ci.roseville.mn.us](mailto:thomas.paschke@ci.roseville.mn.us)

Attachments: A: HR LLC (TPI Hospitality) ERW C: HR LLC (TPI Hospitality) response  
B: MPCA comments



CITIES **EDGE** ARCHITECTS

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**Attachment A**

# **ENVIRONMENTAL REVIEW WORKSHEET APPLICATION AND PROCESS**

## **Hampton Inn & Home 2 Roseville, MN**

1. **Project Title:** Hampton Inn (29639) and Home2 (24277), Roseville, MN

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2. **Proposer:**

Cities Edge Architects  
Jesse Messner / Project Manager  
103 15<sup>th</sup> Ave, Suite 300  
Willmar, MN 56201  
608-644-2280  
jmessner@citiesedgearchitects.com

3. **Project Location:** (street address and/or Ramsey County Parcel Identification Number)

Hampton Inn: 2050 Iona Lane

Home2: 2020 Iona Lane

4. **Project Description:**

A. Provide a brief project summary (approx. 50 words)

**Hampton Inn:** The project will consist of the construction of a five (5) story wood frame Hampton Inn with 100 guest units on the NW portion of the site.

**Home2:** The project will consist of a five (5) story wood frame center loaded Home2 with 102 guest units on the SE corner of the site. A storm water management plan will be developed to accommodate the entire site which will utilize a surface retention pond and underground retention.

B. Provide a complete description of the proposed project and related new construction, including infrastructure needs. Emphasize: 1) construction, operation methods and features that will cause physical manipulation of the environment or will produce wastes (solid or airborne), 2) modifications to existing equipment or industrial processes, 3) significant demolition, removal or remodeling of existing structures, and 4) timing and duration of construction activities.

The project will involve the demolition of old, deteriorating concrete and bituminous pavement, an existing chain link fence as well as some existing utility/light poles. After demolition, the remainder of the site will be stripped and all salvageable topsoil will be stockpiled and protected with erosion control measures. Once the site has been stripped of its topsoil, rough grading activities can begin, which will involve balancing out the site and bringing the grades within 12" – 18" of proposed grade. After rough grading has been completed, the utilities and storm drainage system can be installed, and then the Home2 and Hampton Inn building foundations can be started. At the same time, the proposed retaining wall located east and south of the Home2 building can be constructed and then erection of the buildings themselves can take place once the foundation have been completed. During the buildings

construction, final grading activities can take place and the gravel for the drive aisles/parking lot can be installed. Once the Home2 and Hampton Inn buildings are completed, the parking lot/drive aisles can be paved. It is anticipated that the construction activities will begin during May, 2015, and the completion of the buildings approximately 12 months from the construction start.

**C. Project Magnitude**

Total Project Acreage	3.723 acres
Number and type of residential units	Hampton Inn: 100 Guest Units Home2: 102 Guest Units
Commercial building area (square feet)	Hampton Inn: 58,590 s.f. Home2: 64,773 s.f.
Other uses-specify (square feet)	N/A
Structure height (s)	Hampton Inn: Highest occupied floor is 42'-6" above grade Home2: Highest occupied floor is 42'-6" above grade

**D.** Are future stages of this development including development on any other property planned or likely to happen?  Yes  No  
If yes, briefly describe future stages, relationship to present project, timeline and plans for environmental review.

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

	Before	After		Before	After
Wetlands	0	0	Lawn/Landscaping	1.620	0.768
Deep Water/streams	0	0	Impervious surface	1.801	2.843
Woods/forest	0	0	Storm Water pond	0	0.112
Brush/grassland	0.302	0	Other (describe)	N/A	N/A

**6. Permits & Approvals required:** Provide a list all known local, state and federal permits, approvals, certifications anticipated to be required and any modifications of existing permits or governmental review of plans. List any financial assistance for the project being sought or anticipated for the project, include all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing and infrastructure.

There will not be any non-traditional lender financing for the project.

UNIT OF GOVERNMENT	TYPE OF APPLICATION	STATUS
<b>Federal Government</b>		
Army Corps of Engineers	Section 404 Permit	Future
	Letter of No Wetland Jurisdiction	Future
<b>State</b>		
MPCA	NPDES/SDS General Permit	Pending
MN Environmental Quality Board	Environmental Review	Pending
<b>Regional</b>		
Rice Cree Watershed District	Erosion and Sediment Control Permit	Pending
	Stormwater Management Plan Approval	Pending
	Drainage Authority Review and Approval	Pending
Metropolitan Council	Sanitary Sewer Service Connection Approval	Pending
Ramsey County	Final Plan Approval	Pending
	County Road Access Permits	???
<b>Local</b>		
City of Roseville	ERW	Completed
	Stormwater Management Plan Approval	Pending
	Erosion Control Permit	Future
	Traffic Impact Analysis	Completed
	Preliminary & Final Plat	Completed
	Grading Permit	Pending
	Building Permits	Pending

**7. Land Use:**

A. Describe existing land use of the site as well as areas adjacent to and near the site.

**Vacant and undeveloped**

B. Discuss the project's compatibility with nearby land uses listed in Item 7.A above, as well as Roseville's comprehensive plan, concentrating on implications for environmental effects.

**The property lies within the TWIN Lakes Redevelopment Area currently guided and zoned Community Mixed Use, for which hotels are permitted uses and which use is compatible with the comprehensive plan. The site will be cleaned/remediated to**

**eliminate any know environmental hazards; the storm water will be collected and released per watershed & City requirements. There was a traffic study completed which indicates minimal traffic impacts to the existing roadway network.**

C. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 7.B above.

**There is no known incompatibility.**

#### **8. Fish, Wildlife, and Ecological Sensitive Resources**

A. Identify fish and wildlife resources and habitats on or near the site and describe how they would be affected by the project. Describe any measures to be taken to minimize or avoid impacts.

**Fishery Resources: The development will not adversely impact any near fisheries.**

**Wildlife Resources: The development will not adversely impact any wildlife.**

B. Are any state-listed (endangered, threatened or special concern) species, rare plant communities or other sensitive ecological resources such as native prairie habitat, colonial waterbird nesting colonies or regionally rare plant communities on or near the site? If yes, describe the resource and how it would be affected by the project. Indicate if a site survey of the resources has been conducted and describe the results. Contact and provide a copy of the response from the Minnesota Department of Natural Resources (DNR) Natural Heritage and the Non-Game Wildlife Program, as well as the U.S. Fish and Wildlife Service.

**No**

9. **Water Use.** Will the project involve installation or abandonment of any water wells, connection to or changes in any public water supply or appropriation of any ground or surface water (including dewatering)? If yes, as applicable, give location and purpose of any new wells; public supply affected, changes to be made, and water quantities to be used; the source, duration, quantity and purpose of any appropriations; and unique well numbers and DNR appropriation permit numbers, if known. Identify any existing and new wells on the site map. If there are no wells known on site, explain methodology used to determine.

**This project will simply involve tapping into the existing 12-inch D.I.P. watermain already installed within the street right-of-way along Iona Lane and Mount Ridge Road.**

10. **Water-related Land Use Management Districts.** Does any part of the project involve a shoreline zoning district, a delineated 100 year floodplain, of a state or federally designated wild or scenic river land use district. If yes, identify the district and discuss project compatibility with district land use regulations.

**N/A**

## **11. Geology, soils and topography/land forms**

**A. Geology:** Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.

**Refer to the completed Subsurface Geotechnical Investigation.**

**B. Soils and topography:** Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability or other soils limitations, such as steep slopes, highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections or other measures. Erosion/sedimentation control related to storm water runoff should be addressed in response to Item 9.B.ii.

**Refer to the completed Subsurface Geotechnical Investigation.**

## **12. Water Resources**

**A.** Describe surface water and groundwater features on or near the site in A.i and A.ii below.

i) Surface water: lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include water quality impairments or special designations listed on the current Minnesota Pollution Control Agency (MPCA) 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any. The Rice Creek Watershed District (RCWR) and the Metropolitan Council Citizen-Assisted Monitoring Program (CAMP) should be contacted to provide information on the lake.

**Little Johanna Lake – impaired with TMDL plan – our site is located 0.94 miles southwest of this lake, but will not drain directly to this lake. All other surface water within 1-mile of this site is not considered an impaired body of water.**

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

**1) groundwater was observed at elevation 901.50' and bottom of underground storage piping is at elevation of 904.50' 2) project is not within MDH wellhead protection area 3) Wells: No wells were observed in connection to the Subject Property – as described in the Phase I ESA for this property.**

B. Describe effects from project activities on water resources and measures to minimize or mitigate the effects in Item B.i through Item B.iv below.

i) Storm water: Describe the quantity and quality of storm water runoff at the site prior to post construction. Include the routes and receiving water bodies for runoff from the site (major downstream water bodies as well as the immediate receiving waters). Discuss any environmental effects from storm water discharges. Describe storm water pollution prevention plans including temporary and permanent runoff controls and potential Best management Practice (BMP) site locations to manage or treat storm water runoff. Identify specific erosion control, sedimentation control or stabilization measures to address soil limitations during and after project construction.

**Please refer to the full storm water management plan for this project.**

ii) Water appropriation: Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation.

**N/A**

iii) Surface Waters

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

b) Other surface waters: Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.

**No surface waters/wetlands will be affected by this project – refer to full storm water management plan for additional information.**

### **13. Contamination/hazardous materials/wastes**

**A. Pre-project site conditions:** Describe existing contamination or potential environmental hazards on or in close proximity to the project site such as soil or ground water contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan (RAP).

**See the attached Phase 1 Environmental Site Assessment.**

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

**This type of property does not produce or handle significant amounts of hazardous materials.**

**C. Project related use/storage of hazardous materials.** Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location and size of any above or below ground tanks to store petroleum or other materials. Discuss potential environmental effects from accidental spill or release of hazardous materials. Identify measures to avoid, minimize or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

**This type of property does not produce or handle significant amounts of hazardous materials.**

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

**This type of property does not produce or handle significant amounts of hazardous materials.**

### **14. Air**

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

**The buildings will be heated by natural gas mechanical systems. Projected emissions from such systems will include small amounts of carbon dioxide, nitrous oxides and very small amounts of other byproducts. All emissions are expected to be far below thresholds and the effects on air quality are expected to be negligible.**

**B. Vehicle emissions:** Describe the effect of the project's traffic generation on air emissions. Discuss the project's vehicle-related emissions effect on air quality. Identify measures (e.g. traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions.

**Refer to the traffic study, it is not anticipated that the projects traffic generation will greatly impact the air emissions. Also the analysis performed as part of October 15<sup>th</sup> AUAR for the year 2030 shows average results below the state standards for all conditions modeled; therefore, no mitigation is recommended.**

**C. Dust and odors:** Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 11.A. Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.

**The vicinity of the project will not be impacted by an unusual amount of dust during project construction.**

## **15. Noise**

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

**The area will not include or adjoin to any major noise sources. There are no anticipated noise levels in excess of standard levels.**

## **16. Transportation**

**A.** Describe traffic-related aspects of project construction and operation. Include: 1) existing and proposed additional parking spaces, 2) estimated total average daily traffic generated, 3) estimated maximum peak hour traffic generated and time of occurrence, 4)

indicate source of trip generation rates used in the estimates, and 5) availability of transit and/or alternative transportation modes.

- 1) **The existing parking spaces were 0, the additional parking spaces are 190.**
- 2) **See completed traffic study**
- 3) **See completed traffic study**
- 4) **See completed traffic study**
- 5) **See completed traffic study**

**B.** Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trip exceeds 2,500, a traffic impact study must be prepared even if an EAW is not required. Use the format and procedures described in the Minnesota Department of Transportation's (MnDOT) Access Management Manual, Chapter 5 (available at: <http://www.dot.state.mn.us/accessmanagement/resources.html> or a similar local guidance,

**Refer to the traffic study.**

**C.** Identify measures that will be taken to minimize or mitigate project related transportation effects.

**Refer to the traffic study.**

**NOTE:** The City may require a traffic study to satisfy compliance with this section. Please contact the Roseville City Engineer for further guidance.

### **17. Visual Impacts**

Will the project create adverse visual impacts during construction or operation (such as a glare from intensive lights, lights visible from wilderness areas or city park(s), and large visible plumes of cooling towers or exhaust stacks) explain here.

**No non-routine visual impacts are anticipated.**

### **18. Cumulative potential effects**

**A.** Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.

**There are no other known adverse environmental impacts.**

**B.** Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.

**There are no known future projects.**

C. Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.

**There are no known adverse cumulative environmental effects.**

**19. Other Potential environmental effects**

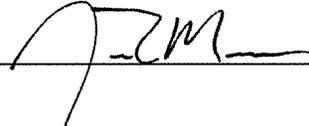
If the project may cause any additional environmental effects not addressed by items 1 to 18, describe the effects here, discuss how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

**There are no other known adverse environmental impacts.**

**20. Signature(s):** By signing below, you attest that the information above and attached:

- Is accurate and complete to the best of your knowledge.
- Describes the complete project; there are no other projects, stages or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively.

Proposer printed name: JESSE R. MESSNER

Proposer signature:  Date: 3/11/2015



## Phase I Environmental Site Assessment



***Twin Lakes Addition***  
*2750 North Cleveland Avenue*  
*Roseville, Minnesota*

Prepared for:

**TORGERSON PROPERTIES**

103-105<sup>th</sup> Avenue NW  
Suite 200  
Willmar, Minnesota 56201

Prepared by:

**WENCK ASSOCIATES, INC.**

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(651) 294-4580

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# 1.0 Summary

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In this Environmental Site Assessment (ESA) we have performed all appropriate inquiry in conformance with the standards and practices set forth in 40 CFR Part 312 – Standards for Conducting All Appropriate Inquiry. Moreover, in keeping with the rule, we have adhered to the general recommendations for format and used the industry-accepted definitions articulated in the American Society for Testing and Materials Phase I Environmental Site Assessment Process, Designation E-1527-05 (the Practice).

This ESA focuses on applying *good commercial and customary practice* to identify *recognized environmental conditions* with respect to a parcel (or parcels) of *commercial real estate*. The primary focus is to determine whether any on-site operations, either present or historical, have caused or contributed to releases of *hazardous substances or petroleum products* to the environment. Additionally, the ESA requires the *environmental professional* to evaluate *business environmental risk* associated with the parcel that may ultimately necessitate investigation beyond that identified within the minimum scope of the Practice. Special attention is also given to understanding whether the property may be affected by releases emanating from neighboring properties.

In the process of preparing this ESA, the following steps were taken: a *records review* from various sources, *site reconnaissance*, *interviews* with persons knowledgeable about the Subject Property (defined below), *evaluation* of the revealed information, and *preparation of this report*.

## 1.1 SUBJECT PROPERTY DESCRIPTION

Wenck Associates, Inc. (Wenck) was authorized by Mr. Tom Torgerson, President and CEO of Torgerson Properties, to conduct an ESA of the property located at 2750 North Cleveland Avenue, in the City of Roseville, Ramsey County, Minnesota (the Subject Property).

The approximately 3.73 acre (162,478.8 square feet) Subject Property is designated Ramsey County tax parcel # 042923330015. The Subject Property is located in the NW ¼ of the SW ¼ Section 4, Township 29 North, Range 23 West of the 4<sup>th</sup> Principal Meridian.

The Subject Property location is depicted in Figure 1. A Site Detail Map is included as Figure 2.

## 1.2 SUBJECT PROPERTY HISTORY

Based on the revealed information, the Subject Property was undeveloped agricultural property with a residential farmstead from at least 1867 until sometime prior to 1931. Reportedly, the Subject Property was in use as a strawberry/raspberry farm from 1931 to sometime prior to 1964. Prior 1964 the Subject Property was developed with commercial building. Dohrn Transfer Company occupied the Subject Property from at least 1966 to 1981. By 1986, ABF Freight Systems was operating at the Subject Property, according to city directories. From 1986 until 1996, according to a previous environmental assessment, ABF Freight Systems occupied the Subject Property. Old Dominion Freight Line, Inc.

occupied and operated at the Subject Property from 1996 to 2005. The Subject Property has been in continuous use as a trucking operation from approximately 1964 to 2005. The Subject Property has been vacant since 2005.

### 1.3 SUBJECT PROPERTY OBSERVATIONS

The Subject Property is currently vacant. No permanent improvements are located above-grade on the Subject Property. A chain-link, barbed wire fence is located along the perimeter of the west and south sides of the Subject Property. Three drive-in access gates are located along the west side of the Subject Property from North Cleveland Avenue. Evidence of a below-grade stormwater detention feature was observed.

### 1.4 SUBJECT PROPERTY REGULATORY INFORMATION

A regulatory database review was requested to provide information about verified or potential sites of regulatory interest with the potential to impact soil or groundwater at the Subject Property.

The Subject Property **was** identified on seven of the reviewed regulatory databases in the GeoSearch™ Radius Report as a “target property.”

Specifically, the Subject Property was identified in the Registered Leaking Storage Tanks (LUAST), Registered Storage Tanks (UAST), Petroleum Brownfield Program (PBF), Spills Listing (PCASPILLS), Water Discharge Permits (WDP), Facility Registry System (FRSMN) and Hazardous Materials Incident Reporting System (HMIRSR05) databases.

Additional mapped sites of regulatory interest identified within the search radii defined by the Practice include:

Number of Sites	Regulatory Database
1	Resource Conservation and Recovery Act- Treatment, Storage and Disposal Facilities (RCRAT) site
1	No Longer Regulated RCRA Generator Facilities (NLRRCRAG) site
1	No Longer Regulated RCRA Non-CORRACTS TSD Facilities (NLRRCRAT) site
5	Resource Conservation and Recovery Act- Generator Facilities (RCRAGR05) sites
8	Brownfield Management System (BF) sites
1	Superfund Site Information Listing (SF) site
14	Registered Storage Tank (UAST) sites
1	Agricultural Spills Listing (AGSPILLS) site
51	Registered Leaking Storage Tank (LUAST) sites

Number of Sites	Regulatory Database
3	Petroleum Brownfields Program (PBF) sites
22	Site Response Section Database (SRS) sites
1	Unpermitted Dump (UNPERMDUMPS) site
20	Voluntary Investigation and Cleanup Program (VICP) sites
<b>129</b>	<b>Total</b>

Additional information about the regulatory review is found in Section 5.1 – *Regulatory Records Review*.

### 1.5 RECOGNIZED ENVIRONMENTAL CONDITIONS

This assessment has revealed no evidence of *recognized environmental conditions* in connection with the Subject Property.

Several *historical recognized environmental conditions* were discovered in connection with the Subject Property.

- The presence of low concentrations of halogenated volatile organic compounds (VOCs) in a deeper aquifer at the Subject Property apparently associated with an off-site source is an *historical recognized environmental condition*. While no determination letter has been issued by the MPCA relative to this release in specific consideration to the Subject Property, it is evident that the concentrations do not exceed applicable regulatory criteria for drinking water, and there is no indication of any shallow impacts to soil at the Subject Property for these halogenated VOCs.
- The two LUAST incidents **are** *historical recognized environmental conditions*. Based on the review of revealed information, contaminated soils and groundwater were encountered on the Subject Property in relation to releases from one 10,000-gallon diesel UST and one 8,000-gallon gasoline UST (leak #1794), and one 12,000-gallon diesel UST (leak #16046). Both leak sites have been granted regulatory closure by the Minnesota Pollution Control Agency (MPCA).
- Additionally, the multiple closed spill incidents on the Subject Property **are** *historical recognized environmental conditions*. Specifically, ten gallons of Styrene Monomer, four gallons of hydrogen peroxide (at a 20-40% concentration) and one gallon of methyl ethyl ketone were released at the Subject Property in different incidents. The most recent release occurred in August, 1995.



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us) | Equal Opportunity Employer

**Attachment B**

April 27, 2015

Mr. Thomas Paschke  
Roseville City Planner  
City of Roseville  
2660 Civic Center Drive  
Roseville, MN 55113

RE: Hampton Inn and Home 2, City Environmental Review Worksheet

Dear Mr. Paschke:

Thank you for the opportunity to review and comment on the draft City Environmental Review Worksheet for the Hampton Inn and Home 2 project (the Project). Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff have the following comments for your consideration.

4A. Project description.

- It is not clear from the way the description is phrased, whether the stormwater management plan will be developed for just one of the hotels or for the entire site.

4B. Project description.

- Will any of the demolition materials be recycled? If not, where will these be disposed?
- How will the topsoil stockpile be protected – what kinds of erosion control measures will be used?
- With this much grading, how will dust emissions be controlled?
- Will soil be brought on to the site to complete the grade? If so, where will the soil come from? How will it be ensured that the soil brought on the site is not contaminated?
- What is the surrounding land use?

6. Permits and approvals required.

- The National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) General Permit should be rewritten to state “NPDES/SDS General Construction Stormwater Permit.”
- The Minnesota Environmental Quality Board does not issue any permits or approvals for this type of project.

7A. Land use.

- Adjacent land use needs to be described here.
- Since there is some demolition to take place, briefly describing the site’s past use would be appropriate. Since there are indications of past sources of environmental concern, these should be described and it should be stated how contamination from these sources will be appropriately remediated.
- How will stormwater be collected and discharged?
- How did the traffic study find that there would be minimal traffic impacts to the existing roadway network? Did the study take into consideration traffic during construction?

8A. & B. Fish, wildlife, and ecological sensitive resources.

- Were the appropriate agencies contacted for this information? Documentation should be provided.

9. Water use.

- Given that the historical land use of the site was a farmstead and then a strawberry/raspberry farm, it is entirely possible that a water well (and an old septic system) may be located on the property. The Minnesota Department of Health should be contacted to determine if there are any records of a well having been located on the property or sealed.

11A. & B. Geology, soils and topography/land forms.

- The "Subsurface Geotechnical Investigation" should be summarized here to reflect the information requested in these sections.

12. Water resources.

- There are several bodies of water and wetlands located in close proximity to the Project site. Langton Lake is located approximately 0.17 miles northeast of the site. There are wetlands located across Cleveland Avenue from the site, and a number of smaller lakes located within this wetland area. These should be described under this section.
- Without knowing the site elevation, it is hard to determine what the groundwater depth is from grade. Given that there are wetlands located less than 150 feet from the site, it could be reasonable to assume groundwater is quite shallow. During construction, dewatering may be required. It may be necessary to obtain a Minnesota Department of Natural Resources water appropriation permit for this activity. Additionally, depending on the method for disposal of the water from the dewatering activity, it may be necessary to obtain an MPCA NPDES/SDS waste water permit if discharge is to a water body, wetland, or land surface.

12Bi. & Biii. Water resources.

- The stormwater management plan should be summarized here to reflect the information requested in these sections.

12Bii. Water resources.

- See number 12 above.

13A. Contamination/hazardous materials/wastes.

- The Phase I Environmental Site Assessment completed for this Project states that contaminated soils and groundwater were encountered on the site in relation to releases from three underground storage tanks formally located at the site. Although both leak sites were granted regulatory closure by the MPCA, contaminated soil and/or groundwater may still be present at the site and encountered during construction. The information requested in this section should be included here.

13B. Contamination/hazardous materials/wastes.

- This question addresses the generation/storage of solid wastes, rather than hazardous wastes. The Project will generate solid waste, especially during construction. The information requested in this section should be included here.

13C. & D. Contamination/hazardous materials/wastes.

- Although the Project (either during construction or operation) will likely not generate significant amounts of hazardous wastes, there is a potential for environmental effects from an accidental spill or release of hazardous materials during construction. It should be determined whether

there will be any petroleum storage on-site for refueling construction equipment. If so, it should be documented how this storage will be contained, and what the response would be in the event of a release of petroleum products.

14B. Air.

- There will be an increase in vehicular emissions, particularly from equipment during construction of the hotels. The information requested in this section should be included here.

14C. Dust and odors.

- There will be a significant increase in dust during construction of this Project. The measures to be used to minimize or mitigate the effects of dust both from the site and from soil transported from the site to the streets from construction traffic should be discussed in this section.

15. Noise.

- Noise levels will increase with construction equipment use. The Project should conform to any local noise ordinances. This should be addressed in this section.

16. Transportation.

- The traffic study was not included as part of the MPCA's review of the draft City Environmental Review Worksheet. The traffic study should be summarized and included in these sections.

18. Cumulative potential effects.

- If contaminated soil is encountered at the site, excavating and hauling this hazardous material has the potential to combine with fugitive dust emissions, and should be discussed in this section.

The MPCA appreciates efforts the city of Roseville will be making in responding to our comments and inputs in the City Environmental Review Worksheet document. We look forward to working with you and offer assistance to insure all of our concerns are addressed.

We appreciate the opportunity to review this Project. 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 permits 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 draft document, please contact me at 651-757-2465.

Sincerely,



Patrice Jensen  
Planner Principal  
Environmental Review Unit  
Resource Management and Assistance Division

PJ:bt



**RAMAKER**  
& ASSOCIATES, INC.

May 6, 2015

City of Roseville  
Mr. Thomas Paschke, Roseville City Planner  
2660 Civic Center Drive  
Roseville, MN 55113

**SUBJECT: HAMPTON INN AND HOME 2, CITY ENVIRONMENTAL REVIEW WORKSHEET**

**SITE: HAMPTON INN & HOME2 SUITES  
2050 IONA LANE W & 2020 IONA LANE W  
CITY OF ROSEVILLE, RAMSEY COUNTY, MINNESOTA  
RAMAKER & ASSOCIATES PROJECT NUMBER: 29639 & 24277**

Dear Mr. Paschke:

In response to the Minnesota Pollution Control Agency's (MPCA) letter, dated April 27, 2015, by Patrice Jensen, Principal Planner for MPCA, Ramaker & Associates, Inc. (RAMAKER) has summarized the following responses which will be utilized by the owner, and the General Contractor, to ensure compliance with MPCA guidance and the City of Roseville's (ROSEVILLE's) Environmental Worksheet. The following is intended to provide further detail as to the MPCA comments, and actions proposed by RAMAKER, on behalf of the owner. Please also note that these responses have been tailored to best suit ROSEVILLE's recommendations, per the May 4, 2015 email from Mr. Paschke to Jesse Mesner of Cities Edge Architects.

**4A. PROJECT DESCRIPTION**

MPCA Comment: It is not clear from the way the description is phrased, whether the stormwater management plan will be developed for just one of the hotels or for the entire site.

ROSEVILLE's Comment: Requires a simple response form you regarding the storm water management plan.

RAMAKER Comment: **The stormwater management plan, completed by RAMKAER on February 13, 2015, was developed for the full site development, including both proposed hotels.**

**4B. PROJECT DESCRIPTION**

- MPCA Comment: Will any of the demolition materials be recycled? If not, where will these be disposed?  
ROSEVILLE's Comment: This bullet point should be answered  
RAMAKER Comment: **Site demolition will be minor and will be largely consist of the removal of existing fencing, concrete, and pavement areas that remain on site. Salvaging these is not cost effective. This material will be transported to proper disposal sites, with disposal records maintained for the duration of the site development activities.**
- MPCA Comment How will the topsoil stockpile be protected-what kinds of erosion control measures will be used?  
ROSEVILLE's Comment: This bullet point should be answered  
RAMAKER Comment: **Topsoil will be stockpiled in mounds and surrounded by silt fence to prevent soil erosion. As the site has been previously developed, remaining topsoil volumes are relatively small. Furthermore, as the entire site will be redeveloped as part this project, the topsoil required to be stockpiled and used for project's landscaping needs will be relatively small.**
- MPCA Comment: With this much grading, how will dust emissions be controlled?  
ROSEVILLE's Comment: This bullet point should be answered  
RAMAKER Comment: **The General Contractor is aware of the need to regularly spray water throughout the site so as to keep bare soil areas moist, thus limiting the potential of airborne dust.**

- MPCA Comment: Will soil be brought on to the site to complete the grade? If so, where will the soil come from? How will it be ensured that the soil brought on the site is not contaminated?  
ROSEVILLE's Comment: This bullet point should be answered  
RAMAKER Comment: **The proposed final site grades may require importing suitable soils and fill material. These materials will be secured from locations that can be verified as "clean" sources. This verification will be completed prior to being brought on-site and maintained, at a minimum, during the construction phase of this project. The future Waste Handling plan will further define how contaminated soils and/or groundwater, found on-site, are handled. Additional comments regarding the forthcoming Waste Handling Plan are detailed in responses to questions 13 A. & B., below.**
- MPCA Comment: What is the surrounding land use?  
ROSEVILLE's Comment: Response to this bullet is not required.  
RAMAKER Comment: **Response to this bullet was not required.**

## 6. PERMITS AND APPROVALS REQUIRED

- MPCA Comment: The National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) General Permit should be rewritten to state "NPDES/SDS General Construction Stormwater Permit".  
ROSEVILLE's Comment: Response should indicate that your noted the name change.  
RAMAKER Comment: **The "Environmental Review Worksheet Application & Process" report, completed by Cities Edge Architects, dated March 11, 2015 has been updated. The update included the renaming of the MPCA permit (Section 6, page 4) from "NPDES/SDS General Permit" to "NPDES/SDS General Construction Stormwater Permit".**
- MPCA Comment: The Minnesota Environmental Quality Board does not issue any permits or approvals for this type of project.  
ROSEVILLE's Comment: Response should indicate that your noted the name change.  
RAMAKER Comment: **See RAMAKER comment above.**

## 7A. LAND USE

- MPCA Comment: Adjacent land use needs to be described here.  
ROSEVILLE's Comment: Response to this bullet is not required.  
RAMAKER Comment: **Response to this bullet has not been provided.**
- MPCA Comment: Since there is some demolition to take place, briefly describing the site's past use would be appropriate. Since there are indications of past sources of environmental concern, these should be described and it should be stated how contamination from these sources will be appropriately remediated.  
ROSEVILLE's Comment: The second bullet address the past source/type of contamination and how they appropriately be remediated.  
RAMAKER Comment: **Based on previous environmental reports, the site was agricultural land with a residential farmstead until the 1930s, and was utilized as a strawberry/raspberry farm from the 1930s until as late as the 1960s. By 1964 a commercial building was constructed on the site. The use of the site included trucking operations, including the occupants Dohrn Transfer Company (circa 1966 to 1981), ABF Freight Systems (circa 1986 to 1996), and Old Dominion Freight Line, Inc. (1996 to 2005). Since 2005 the site has been vacant with no permanent improvements located above grade, with exception to a fence around the site perimeter. Evidence of an underground stormwater storage system was also reported.**

**Environmental concerns associated with the past use of the site and surrounding properties were identified in previous environmental reports.**

1. **The site was used for trucking operations from circa 1964 to 2005**
2. **Two leaking underground storage tank release cases were reported on the site. The releases are associated with a 10,000-gallon diesel UST and 8,000-gallon gasoline UST (release**

#1794), and a 12,000-gallon diesel UST (release #16046). According to previous reports, the releases received regulatory closure; however, the conditions of closure are not specified. According to the closure letter (release #16046), "If future development of this property or the surrounding area is planned, it should be assumed that petroleum contamination may still be present." In addition, according to online information for release #1794, contaminated soil remains on site. Additional review of regulatory files will be required to determine continuing obligations (if applicable) material handling requirements in this area of the site.

3. In 2006, 15 soil borings and 18 test pits at the property were completed, including soil and groundwater sampling in certain areas. In total, 12 groundwater samples and 8 soil samples were sent to the laboratory for chemical analysis. The chemical analysis was limited to volatile organic compounds (VOCs) in all samples and petroleum hydrocarbons (diesel range organics and gasoline range organics) for select samples. VOCs were detected in groundwater in the northeast portion of the site. The consultant concluded that the source of VOCs, which were above regulatory limits at the time, was off-site (potentially the ODFL or PIK Terminal property). This investigation also identified diesel range organics in groundwater near the leaking underground storage tank. Both areas of groundwater contamination were identified within the local aquifer (approximately 45 feet bgs), and not the perched groundwater table (approximately 7 to 15 feet bgs). The perched groundwater table was only tested for VOCs. Methyl ethyl ketone (MEK) was reported in three of the soil samples, but was reported by the consultant as laboratory contamination (see below). Based on the historic use, additional chemical characterization of the soil and groundwater will likely be required prior to on or off-site management of material.
4. Several closed spill incidents are known at the site, including Styrene Monomer, hydrogen peroxide, and methyl ethyl ketone (MEK). Note that MEK was detected in soil during the 2006 site investigation; although it was reported as a laboratory contaminant, and not from a contaminant source on site.
5. Although not identified as concerns in the most recent environmental report (2012), numerous environmental listings (including releases) were mapped within the database report within 500 feet of the site. Additional review may be warranted.

- MPCA Comment: How will stormwater be collected and discharged?  
ROSEVILLE's Comment: Response to this bullet is not required.  
RAMAKER Comment: **Response to this bullet has not been provided.**
- MPCA Comment: How did the traffic study find that there would be minimal traffic impacts to the existing roadway network? Did the study take into consideration traffic during construction?  
ROSEVILLE's Comment: Response to this bullet is not required.  
RAMAKER Comment: **Response to this bullet has not been provided.**

#### **8A. & B. FISH, WILDLIFE, AND ECOLOGICAL SENSITIVE RESOURCES**

MPCA Comment: Were the appropriate agencies contacted for this information? Documentation should be provided.

ROSEVILLE's Comment: Just indicated that ROSEVILLE did send worksheet to US Department of Fish and Wildlife and MN DNR.

RAMAKER Comment: **ROSEVILLE reports that they did send worksheet to US Department of Fish and Wildlife (USFWS) and Minnesota Department of Natural Resources (DNR). ROSEVILLE notes that on May, 1, 2015, ROSEVILLE received a "no comment" (No Effect) summary from the DNR. While ROSEVILLE notes that they are still pending a response from the USFWS, the Informal Biological Assessment of Federally-listed species in Ramsey County, Minnesota (completed by RAMAKER on May 5, 2015), resulted in a finding of "No Effect". As such, RAMAKER feels it appropriate to opine that the proposed site development activities will result in "No Effect" to listed or proposed threatened or endangered species or designated critical habitat. The project is unlikely to jeopardize the continued existence of any proposed endangered or threatened species and is unlikely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973.**

## 9. WATER USE

**MPCA Comment:** Given that the historical land use of the site was a farmstead and then a strawberry/raspberry farm, it is entirely possible that a water well (and an old septic system) may be located on the property. The Minnesota Department of Health should be contacted to determine if there are any records of a well having been located on the property or sealed.

**ROSEVILLE's Comment:** Provide any well information that you have or that site will be inspected prior to construction for well.

**RAMAKER Comment:** **Prior to construction, a site inspection will be completed to identify the potential for remaining wells on the site. In addition, Minnesota Department of Health will be contacted for records of past or present wells. Any unsealed wells will be properly abandoned prior to construction. It is presumed that all monitoring wells associated with previous environmental investigations were abandoned in accordance with local and state requirements.**

## 11A. & B. GEOLOGY, SOILS AND TOPOGRAPHY/LAND FORMS

**MPCA Comment:** The "Subsurface Geotechnical Investigation" should be summarized here to reflect the information requested in these sections.

**ROSEVILLE's Comment:** Provide brief summary of geotechnical report.

**RAMAKER Comment:** **In response to the 11A. & 11B., please find the following response. Note, the questions from the "Environmental Review Worksheet Application & Process" have been italicized (below). The response language, following the application questions, was extracted from the "Subsurface Geotechnical Investigation - Proposed Hotel Buildings", dated January 21, 2015 by Interstate Geotechnical Engineering, Inc.**

*11A. - Geology: Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.*

*11B. - Soils and Topography: Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability or other soils limitations, such as steep slopes, highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections or other measures. Erosion/sedimentation control related to storm water runoff should be addressed in response to Item 9.B.ii.*

### RESPONSE:

**The following conclusions and recommendations are based upon interpreted results of boring logs, their relation to the planned work, and other information. Because the borings represent a small portion of the site in relation to the proposed area of work, ongoing review of construction should be carried out. If excavations reveal subsurface soils of a different nature than those observed in the borings or if the location or elevations or type of the planned work are altered significantly, the Soils Engineer should be contacted for possibly revised recommendations (see #6 below and the following "Limitations of Investigation").**

#### 1. **General Site Suitability:**

**Based upon interpreted results of the borings, it appears that the site has minimal limitations regarding suitability for construction. These mainly consist of the presence of some surficial unsuitable soil, an area where there are some low penetration value/wet soils in the upper zones that may have to be subcut out, the tendency for the site to perch water and the need to adapt the site in general for the intended use. These limitations are correctable by adequate site correction design, foundation engineering and further monitoring of soils as construction proceeds.**

**2. Initial Site Preparation:**

This analysis is based upon the foundation systems being, as indicated earlier, composed of exterior and interior strip footings. Proposed slab elevations are 912.75 and 916.0. Depth of perimeter footings is assumed for now to be 4 foot, and interior footings will be 1 ½ foot below slab grade (deeper if necessary to add confinement).

Any unsuitable soil in the proposed building pad areas should be removed, in an oversized manner as or if necessary. Wherever encountered, the bituminous pavement should be removed and recycled. There does not appear to be any salvageable aggregate base material below. The various other unsuitable soils noted earlier, predominantly in the southwest building area, should be removed to varying depths (½ foot – 2 foot). However, as this area appears randomly disturbed, other, possibly deeper, zones of unsuitable soil may be encountered which should be removed as well. Firm naturally occurring mineral soils should be achieved. A preliminary analysis indicates that, for the northwest building, the base of excavation will be below interior footings and below perimeter footings in the two westmost borings. For the southeast building, additional cutting for foundations, particularly trenching for exterior footings, will be necessary; only at a few of the lower elevation borings will a void result below interior footings.

In the vicinity of Borings 4 & 5, there should be very close inspection of soil exposed, including frequent hand auger borings. Boring evidence indicates that first mineral soil encountered will be firm, and that the noted wet and softer soil will be "one footing width" or more below footing level. This will not significantly affect footing performance due to separation and the relatively thin thickness of these zones. However, if these materials are indeed encountered in this noted zone, they should be subcut out, in an oversized manner, as necessary.

Oversizing of any excavation below footings will be necessary for proper lateral stability of the fill. As indicated by #5 below, this oversizing should be 1:1 from footing level. Once this excavation has been accomplished, any void below planned foundation and slab areas should be restored with controlled fill. Perimeter footings could be lowered somewhat, beyond their typical levels, to minimize this oversizing or to achieve better soils and eliminate the supplemental subcut. But the interior of the building pad area will still have to be built up to grade with controlled fill.

Remnants of a former building on the site may be encountered. It could be old foundations or loose foundation trench voids, possibly and isolated basement or pit void. These zones, if encountered, will have to be subcut out and resulting voids refilled in a controlled manner.

If any water, be it perched groundwater or rainfall, interferes with construction, it should be controlled during foundation construction, perhaps by a method such as sumping. If worker traffic tends to destabilize footing contact soil, a few inches of stabilizing aggregate, such as clean coarse rock, could be applied to trench bottoms. If this is done, the soils engineer should inspect the contact soil prior to application of aggregate.

It should again be emphasized, however, that the estimated depths of excavation of unsuitable soil given above are preliminary estimates based mostly upon random split-barrel sampler tests, which are not as accurate as auger borings. These should be considered preliminary estimates only, to be verified by actual excavations. In fact, for construction quantity purposes, a small amount of additional estimated excavation depth should be added to that given in the logs to conservatively allow for variations and for inadvertent over-excavations which are impossible to avoid when power machinery is employed for the purpose. It is especially cautioned again that, since this site has been already altered, there could be areas of unsuitable soil not represented by the borings to date. These zones could additionally include old trash pits, test excavations, utility trenches, etc. Excavators should be especially aware of this possibility.

Excavated organic material, uncontrolled fill, wet unstable soil or other soil contaminated with topsoil, vegetation, etc., should be disposed of offsite, or in landscaping areas, where the bearing of weight will not be required. There appears to be some opportunity to salvage mineral site soil for re-use as controlled fill as some of it, from the southeasterly area, will be sandy, although with a considerable fines content and a high standard maximum density. But, the volume will likely be minimal. Other excavated soil will be suitable (organic, over moist or saturated, etc.). Some material for controlled fill placement will have to be imported. Refer to subsequent sections for more detailed and specific recommendations for site correction recommendations for each structural component.

**3. Foundations:**

For purposes of proposed construction, foundations and fill to support foundations must rest upon and over mineral (non-organic) soils of adequate bearing value. As indicated earlier, a bearing capacity of 3000 pounds per square foot (psf) has been targeted on a preliminary basis.

This analysis of soil for foundation purposes is based upon the locations, designs configuration and likely grades indicated above. If there is any significant deviation from any assumptions indicated herein, then these recommendations may have to be reconsidered.

If the site is prepared as outlines in #2 above, removing unsuitable soil, performing further excavations as necessary, controlling any water that may enter the excavation and placing controlled fill as necessary, then perimeter footings for the northwest building may be generally designed allowing 3000 psf foundation bearing capacity. This value is recommended on the basis of the fact that footings will rest upon either naturally occurring mineral soil with high penetration values or upon well compacted fill, and with any detected softer zones within "one footing width" of footings removed (see above discussion regarding the vicinity of Borings 4 & 5). For the southeast building a slightly higher value of 3500 psf may be used due to greater confidence in soils here, especially in that none of the thin zones of wet softer soil were found. Interior pad footings, owing to their square configuration and larger size, and with a minimum of 1 ½ feet of confinement, may be designed allowing 3500 psf foundation bearing capacity. Interior strip footings 2 feet wide or greater, again with a minimum of 1 ½ foot of confinement, may be designed allowing 2500 psf foundation bearing capacity. These interior bearing capacities could be increased by increasing confinement (i.e. lowering footings), but only after consultation with the soils engineer. All of the allowable bearing capacities recommendation take into account shear failure potential near footing levels and the nature of deeper soil regarding settlement potential.

Fill, as required, should be placed, compacted, and tested as per the "Fill Placement" (#5) section following. Note that a compaction level of 98% of Standard Maximum Density is recommended. This applies to interior confining soils as well. The above should provide a factor of safety against foundation failure of approximately 3. Over-all and differential settlements should be less than ½" and ¼", respectively. If footing conditions change from what has been assumed herein, further study and analysis would be necessary.

If the site is graded to different levels than assumed above, if the type of building proposed changes or if soils of a significantly different nature are discovered during excavations, the Soils Engineer should be contacted for re-analysis and possibly revised recommendations.

It is not recommended to place footings upon or over organic soil or any unsuitable soil or to deviate from recommendations contained herein as shear failure of footings or excessive differential settlement of the structure could result.

**4. Slabs:**

Slabs and fill to support slabs should also rest upon and over mineral soil of adequate density to resist settlement. Based upon boring evidence, base mineral soils on the site, with

pavement, organic soil, fill, vegetation and any other encountered unsuitable soil removed in an and with controlled fill placed thereon as necessary, are adequate for slab support. It is not recommended to abate site preparation below slabs or pavements in any manner.

Slabs should have clearance from maximum anticipated aquifer groundwater level and should be protected from intrusion by surface waters. There does not appear to be any aquifer groundwater on the site that would impact construction nor long-term use of the building.

5. **Fill Placement:**

Fill material, as required, should be mineral soil, free of debris, boulders and organic material, of such suitable moisture content that it can be readily compacted to specified levels. Fill should be placed and compacted in a manner that will allow complete compaction of the total fill layer to 98% of Standard Maximum Density according to ASTM D 698. Frozen material should not be used in fill construction, nor should any part of the completed fill be allowed to freeze.

In the upper 3' of embankments in parking and drive areas, this fill should be compacted to 100% of Standard Maximum Density. If crushed rock or any other very coarse granular soil or aggregate (>30% 3/4" or coarser) is used in isolated areas, the above Standard Maximum Density would not be applicable. In this case, the fill should be compacted to 60% of Maxim Index Density according to ASTM D 4253.

A soil compaction test should be conducted for every two feet of fill in appropriate segments of the area.

Top of fill should extend at least one foot horizontally beyond the structure pad or footing limits. The fill surface may then extend downward and outward on a 1:1 slope to competent soil. It is upon this basis that required oversizing should be computed.

6. **Inspection and Testing:**

The Client should retain a geotechnical engineering firm to inspect excavations, make field judgments as to subsoil adequacy, and to carry out a program of field and laboratory testing of engineered fill and possibly other materials. This firm should bear full responsibility for knowledge of contents of this report and for proper interpretation and correlation of data, and be prepared to make any further analysis as necessary.

7. **Final Site Topography:**

Final soil surfaces should be graded to provide adequate drainage from structures and hard surfaces so that as little water as possible infiltrates into soils adjacent to the structure.

## 12. WATER RESOURCES

- **MPCA Comment:** There are several bodies of water and wetlands located in close proximity to the Project site. Langton Lake is located approximately 0.17 miles northeast of the site. There are wetlands located across Cleveland Avenue from the site, and a number of smaller lakes located within this wetland area. These should be described under this section.  
**ROSEVILLE's Comment:** If the groundwater depth is known it can be added here as well as any information regarding dewatering during construction.  
**RAMAKER Comment:** Based on geotechnical data, it appears that the groundwater exists at the site in a perched layer between 7 and 15 feet below grade. The permanent groundwater aquifer appears to exist at a depth of approximately 45 feet. If dewatering is required during the construction stage of the project, all dewatering will follow the guidances outlined in the forthcoming Waste Handling Plan (see 13 A. & B., below). The Waste Handling Plan will provide a summary on when dewatering will occur and how the water is to be treated (stormwater sewer, sanitary sewer, or bulk storage for off-site disposal, etc.). Further details will follow, and will be made available prior to the initiation of construction.

- MPCA Comment: Without knowing the site elevation, it is hard to determine what the groundwater depth is from grade. Given that there are wetlands located less than 150 feet from the site, it could be reasonable to assume groundwater is quite shallow. During construction, dewatering may be required. It may be necessary to obtain a Minnesota Department of Natural Resources water appropriation permit for this activity. Additionally, depending on the method for disposal of the water from the dewatering activity, it may be necessary to obtain an MPCA NPDES/SDS waste water permit if discharge is to a water body, wetland, or land surface.  
ROSEVILLE's Comment: As above.  
RAMAKER Comment: **If dewatering was to be required during the construction stage of the project, all dewatering will follow the guidances outlined in the forthcoming Waste Handling Plan (see 13 A. & B., below). The Waste Handling Plan will provide a summary on when dewatering will occur and how the water is to be treated (stormwater sewer, sanitary sewer, or bulk storage for off-site disposal, etc.). Further details will follow, and will be made available prior to the initiation of construction.**

## **12BI. & BIII. WATER RESOURCES**

MPCA Comment: The stormwater management plan should be summarized here to reflect the information requested in these sections.

ROSEVILLE's Comment: State see above and note section where you discussed storm water plan.

RAMAKER Comment: **See below:**

### 12Bi - Storm water:

*Describe the quantity and quality of storm water runoff at the site prior to post construction. Include the routes and receiving water bodies for runoff from the site (major downstream water bodies as well as the immediate receiving waters).*

**See Section 4.1 and 4.2 of the Storm Water Management Plan, prepared by RAMAKER and dated February 13, 2015.**

*Discuss any environmental effects from storm water discharges. Describe storm water pollution prevention plans including temporary and permanent runoff controls and potential Best management Practice {BMP} site locations to manage or treat storm water runoff. Identify specific erosion control, sedimentation control or stabilization measures to address soil limitations during and after project construction.*

**See forthcoming Storm Water Pollution Prevention Plan to be completed by RAMAKER. Specifics regarding these criteria will be outlined throughout the report. Please contact Jesse Mesner of Cities Edge Architects to schedule a pre-construction review of the plan.**

### 12Biii - Surface Waters:

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

**The project will be provided with a detention area that will control the rate of runoff as well as provide some degree of water treatment and oil removal. Runoff discharge will be connected to the existing ROSEVILLE storm water sewer system and pre and post-development runoff rates will remain unchanged or reduced. Therefore, effects to existing nearby wetlands are not expected. Storm water will be diverted to ROSEVILLE's existing storm sewer system. As such, there will be no net increase and/or Direct/Indirect effect to wetlands.**

*b) Other surface waters: Describe any anticipated physical effects or alterations to surface water features {lakes, streams, ponds, intermittent channels, county /judicial ditches} such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to*

*avoid or minimize turbidity /sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.*

**The project will be provided with a detention area that will control the rate of runoff as well as provide some degree of water treatment and oil removal. Runoff discharge will be connected to the existing ROSEVILLE storm water sewer system and pre and post-development runoff rates will remain unchanged or reduced. Therefore, effects to existing nearby wetlands are not expected. There will be no effects. Storm water will be diverted to ROSEVILLE's existing storm sewer system. As such, there will be no net increase and/or Direct/Indirect effect to other surface waters.**

## **12BII. WATER RESOURCES**

MPCA Comment: See number 12 above.

ROSEVILLE's Comment: No no response necessary.

RAMAKER Comment: **Response to this bullet was not required.**

## **13A. CONTAMINATION/HAZARDOUS MATERIALS/WASTES**

MPCA Comment: The Phase I Environmental Site Assessment completed for this Project states that contaminated soils and groundwater were encountered on the site in relation to releases from three underground storage tanks formally located at the site. Although both leak sites were granted regulatory closure by the MPCA, contaminated soil and/or groundwater may still be present at the site and encountered during construction. The information requested in this section should be included here.

ROSEVILLE's Comment: Brief response on what will be done with and remaining hazardous materials if found during construction.

RAMAKER Comment: **A Material Handling Plan will be developed prior to construction. Prior to development of the plan, additional review of regulatory files regarding the closed LUST incidents, as well as characterization of wastes will be required to determine the appropriate handling of unearthed material during the construction project. The objectives of the additional review, characterization, and Material Handling Plan will be to summarize known contaminants, identified areas of concern with respect to the known contamination, provide an overview of anticipated construction activities, define criteria to identify material types, identify field procedures to segregate materials or on or off-site disposal, and summarize disposal and manifest requirements. All contractors will be required to handle contaminated materials in accordance with the Material Handling Plan. In addition, environmental oversight during construction will be implemented to document handling of material during construction. If required, the Material Handling Plan will be provided to MPCA for approval prior to construction.**

## **13B. CONTAMINATION/HAZARDOUS MATERIALS/WASTES**

MPCA Comment: This question addresses the generation/storage of solid wastes, rather than hazardous wastes. The Project will generate solid waste, especially during construction. The information requested in this section should be included here.

ROSEVILLE's Comment: Provide a brief response on what will be done with the solid wastes generated during construction.

RAMAKER Comment: **A Material Handling Plan will be developed prior to construction. Prior to development of the plan, additional review of regulatory files regarding the closed LUST incidents, as well as characterization of wastes will be required to determine the appropriate handling of unearthed material during the construction project. The objectives of the additional review, characterization, and Material Handling Plan will be to summarize known contaminants, identified areas of concern with respect to the known contamination, provide an overview of anticipated construction activities, define criteria to identify material types, identify field procedures to segregate materials or on or off-site disposal, and summarize disposal and manifest requirements. All contractors will be required to handle contaminated materials in accordance with the Material Handling Plan. In addition, environmental oversight during construction will be implemented to document handling of material during construction. If required, the Material Handling Plan will be provided to MPCA for approval prior to construction.**

### **13C. & D. CONTAMINATION/HAZARDOUS MATERIALS/WASTES**

MPCA Comment: Although the Project (either during construction or operation) will likely not generate significant amounts of hazardous wastes, there is a potential for environmental effects from an accidental spill or release of hazardous materials during construction. It should be determined whether there will be any petroleum storage on-site for refueling construction equipment. If so, it should be documented how this storage will be contained, and what the response would be in the event of a release of petroleum products.

ROSEVILLE's Comment: Provide a brief response on how the site plans to address petro refueling and protect/contain possible spill.

RAMAKER Comment: **The specifications for this project will outline that the General Contractor will be required to establish a hazardous material handling and containment plan that must be followed during the construction phase of this project. This plan will outline specific requirements such as secondary containment systems for on-site storage of fuel or other potentially hazardous materials. The plan will further define specific procedures in the event of an inadvertent release. Air quality and dust control methods will also be part of this established plan, and will include such things as watering roadways to control dust, or proper PPE to be used around equipment to maintain worker safety.**

### **14B. AIR**

MPCA Comment: There will be an increase in vehicular emissions, particularly from equipment during construction of the hotels. The information requested in this section should be included here.

ROSEVILLE's Comment: If known please indicate the anticipated amount of vehicle emissions released from construction vehicles during construction.

RAMAKER Comment: **During the start of construction, heavy excavating equipment will be necessary that has the potential to add minimally to air emissions. The General Contractor has been made aware that construction activities are required to meet all applicable EPA requirements as they pertain to specific construction operations. As far as permanent building emissions, current codes and MEP design standards provide that when properly installed, little or no emissions are developed or emitted from the structure.**

### **14C. DUST AND ODORS**

MPCA Comment: There will be a significant increase in dust during construction of this Project. The measures to be used to minimize or mitigate the effects of dust both from the site and from soil transported from the site to the streets from construction traffic should be discussed in this section.

ROSEVILLE's Comment: Provide brief response indication how you plan to minimize/mitigate dust from construction site.

RAMAKER Comment: The contractors will be made aware of the need to regularly spray water throughout the site so as to keep bare soil areas moist, thus limiting the potential of airborne dust.

### **15. NOISE**

MPCA Comment: Noise levels will increase with construction equipment use. The Project should conform to any local noise ordinances. This should be addressed in this section.

ROSEVILLE's Comment: Provide a note that you are aware of ROSEVILLE noise standards.

RAMAKER Comment: RAMAKER has validated that the owner is aware of ROSEVILLE's noise standards.

### **16. TRANSPORTATION**

MPCA Comment: The traffic study was not included as part of the MPCA's review of the draft ROSEVILLE Environmental Review Worksheet. The traffic study should be summarized and included in these sections.

ROSEVILLE's Comment: Response to this item is not required.

RAMAKER Comment: Response to this item has not been provided.

### **18. CUMULATIVE POTENTIAL EFFECTS**

MPCA Comment: If contaminated soil is encountered at the site, excavating and hauling this hazardous material has the potential to combine with fugitive dust emissions, and should be discussed in this section.

ROSEVILLE's Comment: Provide a brief description on how contaminated soil will be addressed if hauled from site.

**RAMAKER Comment: A Material Handling Plan will be developed prior to construction. Prior to development of the plan, additional review of regulatory files regarding the closed LUST incidents, as well as characterization of wastes will be required to determine the appropriate handling of unearthed material during the construction project. The objectives of the additional review, characterization, and Material Handling Plan will be to summarize known contaminants, identified areas of concern with respect to the known contamination, provide an overview of anticipated construction activities, define criteria to identify material types, identify field procedures to segregate materials or on or off-site disposal, and summarize disposal and manifest requirements. All contractors will be required to handle contaminated materials in accordance with the Material Handling Plan. In addition, environmental oversight during construction will be implemented to document handling of material during construction. If required, the Material Handling Plan will be provided to MPCA for approval prior to construction.**

Thank you again for the opportunity to provide you with these additional comments and responses to the MPCA recommendations.

If you have any questions or comments, please do not hesitate to contact our office:

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Sincerely,

RAMAKER & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'Andrew J. Rice', written over a horizontal line.

Andrew J. Rice, Project Manager