

FINDINGS OF FACT and CONCLUSIONS

White Bear Lake Independent School District (ISD #624) High School Expansion Project

**Prepared for:
City of White Bear Lake**

and

White Bear Lake School District



**Prepared by:
Short Elliott Hendrickson, Inc.**



March 2021

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FINDINGS OF FACT AND CONCLUSIONS

White Bear Lake Independent School District (ISD #624) High School Expansion Project

Located in:
City of White Bear Lake, Ramsey County, MN

1.0 STATEMENT OF ISSUE

The White Bear Lake Independent School District (ISD #624) High School Expansion Project is located in the City of White Bear Lake, Ramsey County, MN. The proposed project includes a 397,977 square foot expansion of new institutional building space (classrooms, office, storage, gymnasium, theater, and other accessory/common areas). Other site features will include internal access roads, parking lots, sidewalks, stormwater management features, athletic/activity field improvements, and utility infrastructure for the expanded school and ancillary uses.

Preparation of an Environmental Assessment Worksheet (EAW) is considered mandatory under Minnesota Rules 4410.4300. The White Bear Lake School District is the project proposers, while the City of White Bear Lake is the Responsible Governmental Unit (RGU) for review of this project, as per Minnesota Rules 4410.4300, Subpart 14(B).

The City of White Bear Lake's decision in this matter shall be either a negative or a positive declaration of the need for an Environmental Impact Statement (EIS). The City must order an EIS for the project if it determines the project has the potential for significant environmental effects.

Based upon the information in the record, which comprises the EAW for the proposed project, related studies referenced in the EAW, and other supporting documents included in this Findings of Fact and Conclusions document, the City makes the following Findings of Fact and Conclusions:

2.0 ADMINISTRATIVE BACKGROUND

- 2.1 The White Bear Lake Independent School District (ISD #624) is the project proposer for the High School Expansion Project. The Responsible Governmental Unit (RGU) is the City of White Bear Lake. A State Environmental Assessment Worksheet (EAW) has been prepared for this project as part of the state environmental review process to fulfill requirements of M.S. 116D and Minnesota Rules Chapter 4410. The EAW is used to provide sufficient environmental documentation to determine the need for a state EIS or that a Negative Declaration is appropriate.
- 2.2 The EAW was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comments to the required EQB distribution list. A "Notice of Availability" was published in the EQB Monitor on February 2, 2021. **Appendix A** contains a copy of the EQB Monitor listing for the project and members on the EAW Distribution List. The EAW was posted on the ISD #624 web site at: <https://www.isd624.org/about/building-our-future>. A media release was distributed to the White Bear Press on January 25, 2021 (see **Appendix A**).

- 2.3 The EAW was made available for public review at the White Bear Lake City Office and the Ramsey County Public Library (White Bear Lake Branch). Comments were formally received through Friday, March 5, 2021.
- 2.4 A total of 7 comments were received during the EAW comment period. All comments received during the comment period were considered in determining the potential for significant environmental impacts. Comments received during the comment period and responses to substantive comments are provided in **Appendix B**.

3.0 FINDINGS OF FACT

3.1 Project Description

Beginning in 2017, ISD #624 created a Strategic Plan to study and identify the District's needs and the ability to provide adequate facilities for existing and future student enrollments. Following the Strategic Plan, a comprehensive review of the District's existing facilities and future needs was undertaken. A primary recommendation of the facilities review and planning process was to create a single grades 9-12 high school building. The study gathered internal and external feedback from the community and brought forth a bond referendum that included several capital improvements including the construction of a single White Bear High School building located at the site of the existing North Campus Site. In the fall of 2019, voters in the ISD 624 district approved the referendum, whereby providing the needed funding for the expanded high school. Other operational recommendations being planned include moving the District Offices from Central Middle School to the Sunrise Park building and converting the South Campus High School (currently serving 11th and 12th grades) to a middle school for the southern portion of the District.

Construction of the proposed school expansion will include three additional wings that will be one- and three-story structures. Other associated school facilities include added student and faculty parking, student drop-off zones, school bus loading/unloading zone, and internal access/circulation roads. In conjunction with the school building facilities, the project proposes to construct or reconfigure the athletic fields and courts at both the North Campus site and Central Middle School site. The proposed facilities will accommodate a variety of activities including, but not limited to, physical education classes and team sports such as football, soccer, lacrosse, tennis, track & field, etc. The centrally located track and field is proposed to include "stadium lighting" for evening events. Larger events (varsity football) will continue to utilize the stadium facility located at South Campus.

Included in the project site is the Central Middle School. While no exterior building improvements will occur, the Middle School facilities will be expanded into what is currently District administrative space. The school administration facilities will be relocated to what is currently Sunrise Park Middle School, which is located several miles south of the proposed high school expansion site. Additionally, the two schools propose to share a new bus loading and drop off zone and the athletic/activity facilities.

Roadway improvements in the study area will also occur in conjunction with the school improvements. These improvements are being developed by ISD #624, in close coordination with the appropriate roadway authorities (MnDOT, Ramsey County, and White Bear Lake). Transportation improvements include traffic control changes, intersection safety/capacity improvements, and enhanced pedestrian/bicycle facilities. Utility infrastructure (sewer/water) will be improved within and to the project site. Stormwater infrastructure will include both surface and underground collection and treatment system that will be design in accordance with local and state regulations.

3.2 Additional Information Regarding the EAW Since It Was Published

Since the EAW was published, the project site plan has remained the same and no changes to the EAW findings are needed.

3.3 Findings Regarding Criteria for Determining the Potential for Significant Environmental Effects

Minnesota Rules 4410.1700 provides that an Environmental Impact Statement shall be ordered for projects that have the potential for significant environmental effects. In deciding whether a project has the potential for significant environmental effects, the following four factors described in Minnesota Rules 4410.1700, Subp.7 shall be considered:

- A. Type, extent, and reversibility of environmental effects
- B. Cumulative potential effect of related or anticipated future projects

The RGU shall consider the following factors: whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project
- C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.

The RGU may rely only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project; and
- D. The extent to which environmental effects can be anticipated and controlled because of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.

The City of White Bear Lake's key findings for the ISD #624 Highway School Expansion Project with respect to each of these criteria are set forth below:

3.3.1 Type, Extent, and Reversibility of Impacts

The City of White Bear Lake finds that the analysis completed during the EAW process is adequate to determine whether the project has the potential for significant environmental effects. The EAW describes the type and extent of impacts anticipated to result from the proposed project. In addition to the information in the EAW, the additional information described in Section 3.2 of this Findings of Fact and Conclusions document as well as the public/agency comments received during the public comment period (see **Appendix B**) were taken into account in considering the type, extent, and reversibility of project impacts. Following are the key findings regarding potential environmental impacts of the proposed project and the design features included to avoid, minimize, and mitigate these impacts:

3.3.1.1 Land Use:

Land Use and Development: The project is proposed on the same location as the existing White Bear Lake High School North Campus and Central Middle School. The site plan does include expansion of the ISD #624 property with the acquisition of several residential building sites.

The City of White Bear Lake's 2040 Comprehensive Future Land Use Plan identifies "Public/Semi-Public" and "Residential" for the property within the school site plan. There are no special districts/overlays associated with the site. A replatting and rezoning of several residential parcels will occur as part of the local site development and permitting/approval process.

3.3.1.2 Water Resources:

Surface Waters: The project will not involve work in surface waters. Several water features are near the project area, Bald Eagle Lake, White Bear Lake, and a few unnamed wetlands. Runoff from construction sites can impact downstream surface waters which is mitigated by the temporary and permanent BMPs required under the NPDES/SDS Construction Stormwater Permit. Temporary erosion and sediment control measures will be implemented throughout the construction activities to protect downstream receiving surface waters. Permanent BMPs are discussed more in the following section, stormwater management.

Groundwater: The site of the proposed school expansion is located outside of White Bear Lake's Wellhead Protection Plan area and is not located within a designated wellhead protection or drinking water supply management area.

Wastewater:

The expanded school will produce and increase the amount of wastewater from the site. The wastewater generated in the school will be sanitary sewage and will be serviced by the City and Metropolitan Council Environmental Services sanitary sewer lines and ultimately treated at the Metropolitan Wastewater Treatment Plant. A total of 61,000 gallons per day of wastewater is estimated to be produced which is within the capacity of existing sewer lines and the treatment plant.

Stormwater Management: The study area lies within the Rice Creek Watershed District (northern portion of study area) and the Vadnais Lake Area Water Management Organization (southern portion of study area). The majority of existing stormwater from the North Campus School building, including the surrounding parking areas, slope to the north towards existing wetlands surrounding the athletic fields. The post school expansion drainage patterns on the site will maintain the existing drainage patterns. The project will result in an increase of impervious surfaces by approximately 14.3 acres. The majority of the added impervious is a result of the school building expansion, new parking lots, access roads, and sidewalks. To meet water quality permit requirements, a series of stormwater ponds/infiltration basins and underground chamber cells are proposed throughout the site. All stormwater BMPs will comply with local and state requirements.

Water appropriation: The school site is currently connected to the City of White Bear Lake's municipal water supply provided to the site via connections to the Division Avenue watermain line. Existing water main lines will be utilized and upgraded as needed, including added connections to improve looping and provide redundancy in the system.

If temporary dewatering is necessary for construction activities a MNDNR water appropriations permit will be obtained.

Wetlands and wet ditches: The project will result in approximately 1.0 acre of wetland impacts due to proposed improvements to the athletic fields located north of the building site. The areas of impact are currently used as recreational fields for school and athletic activities, but they have been prone to wet field conditions. The proposed improvements will fill and regrade the entire athletic field area,

whereby creating the wetland impacts. The wetland permitting process is underway including the identification of wetland mitigation that will be completed in the form of purchasing wetland credits from a certified wetland bank.

Floodplain: There are no designated floodplains within the study area.

- 3.3.1.3 Contamination: According to the MPCA’s “What’s in My Neighborhood” online dataset, there are five known occurrences of potential hazardous waste/contamination within the study area. These occurrences are primarily associated with the ISD #624 transportation maintenance facility (bus garage/shop and bus storage lot). The proposed project includes the removal and relocation of the transportation maintenance facility to an off-site location. The bus garage/shop and associated above and below ground fuel storage tanks) and other hazardous materials will be removed in compliance with state regulations. Any unknown materials that may be encountered during construction will be handled in accordance with the Construction Contingency Plan (CPP), which will identify how to handle any contaminants encountered.

All solid wastes generated by construction of the proposed project will be disposed of properly in a permitted, licensed solid waste facility. Project demolition of concrete, asphalt, and other potentially recyclable construction materials will be directed to the appropriate storage, crushing, or renovation facility for recycling. Any contaminated spills or leaks that occur during construction are the responsibility of the contractor and would be responded to according to the MPCA containment and remedial action procedures.

- 3.3.1.4 Fish, Wildlife, Plant Communities and Sensitive Ecological Resources: The project is not anticipated to have any substantial adverse impacts to fish, wildlife, and ecologically sensitive resources. Impacts to existing vegetation, including the removal of trees, grasslands, and other natural vegetation will occur because of constructing the proposed project. Efforts will be made to minimize and protect natural vegetation and a complete landscape/vegetation plan is being developed and will be in accordance with City zoning and replacement requirements. Vegetative screening of adjacent residential properties will also be provided per city code.

- 3.3.1.5 Historic: A literature review was conducted for the study area to determine if any known archaeological or historic cultural resources have been previously identified surrounding the school site. Information obtained from the Minnesota State Historic Preservation Office (MnSHPO) shows there are no known or National Register listed archaeological or historical sites within to the study area. As a result of the review, it has been determined that no archaeological or historical site impacts are anticipated.

- 3.3.1.6 Visual: While there will be minor visual impacts involving the school expansion (increased site footprint, building heights, and removal of vegetation), the site is consistent with an urban landscape and existing North Campus and Central Middle School developments. Therefore, substantial negative visual impacts are not anticipated.

- 3.3.1.7 Construction Noise and Dust: Construction related activities will result in temporary noise level increases associated with construction equipment. The duration of the project is anticipated to last up to two full construction seasons with work occurring during daylight hours. High-impact noise construction activities will be limited in duration to the greatest extent possible.

Dust generated during construction will be minimized through standard dust control measures such

as applying water to exposed soils and limiting the extent and duration of exposed soil conditions. Construction contractors will be required to control dust and other airborne particulates in accordance with city development standards. After construction is complete, dust levels are anticipated to be minimal because all soil surfaces exposed during construction would be in permanent cover (i.e., paved or re-vegetated areas). During construction, particulate emissions will temporarily increase due to the generation of fugitive dust associated with activities such as building demolition and soil disturbance.

- 3.3.1.8 Transportation: The proposed high school expansion project will generate traffic in the study area. A detailed Traffic Impact Study was completed as part of the project development process. The study report (included in an appendix of the EAW) defined several transportation improvements that will be implemented to mitigate traffic impacts. These improvements include expanding turn lanes, intersection traffic controls, lane additions, and pedestrian improvements are being coordinated with the appropriate roadway jurisdiction (City of White Bear Lake, Ramsey County, and MnDOT).
- 3.3.1.9 Considerations Relating to Pedestrians and Bicyclists: Improving the accommodations of bicycle and pedestrian movements in the project area has been an important consideration in the planning phase of the project. The proposed improvements include new sidewalks interconnecting different uses across the site as well as a new sidewalk along 8th Street between Highway 61 and Bloom Avenue. Additional sidewalk and trail improvements in the area are being assessed by the School District in coordination with the City of White Bear Lake, White Bear Township, and Ramsey County.
- 3.3.1.10 Summary finding with respect to these criteria: The City of White Bear Lake finds that the project, as it is proposed, does not have the potential for significant environmental effects based on the type, extent, and reversibility of impacts to the resources evaluated in the EAW and in the Findings summary above. Project impacts will be mitigated as described in the EAW and in the Findings above.

3.3.2 Cumulative Potential Effects of Related or Anticipated Future Projects

ISD #624 has no immediate future projects in proximity to the High School Expansion Project that would interact with the environmental effects of the proposed action.

The City of White Bear Lake anticipates future land use redevelopment in the City's Theater District. The timeline for development is not known at this time and is highly dependent upon market forces and private landowner decisions. The analysis in this document took into consideration future development opportunities for the purposes of social, economic, and environmental impacts in the study area. Any future projects will be reviewed by the City of White Bear Lake and mitigation (if necessary) will be defined as development plans become available. It is not anticipated that future projects will combine with the impacts caused by the proposed high school project in this EAW to cause significant cumulative potential effects.

3.3.3 Extent to Which the Environmental Effects are Subject to Mitigation by Ongoing Public Regulatory Authority

- 3.3.3.1 The mitigation of environmental impacts will be designed and implemented in coordination with regulatory agencies and will be subject to the plan approval and permitting processes. Permits and approvals that have been obtained or may be required prior to project construction include those listed in **Table 1**.

Table 1 – Permits and Approvals

Unit of Government	Type of Permit/Approvals	Status
City of White Bear Lake	Site Plan Review	To Be Obtained
	Comprehensive Plan Amendment to re-guide parcels from Low Density Residential to Public/Semi-Public	To Be Obtained
	City Land Use Development/Building Permits	To Be Obtained
	Roadway/Access Permit (Division Ave.)	To Be Obtained
Ramsey County	Roadway/Access Permit (Bald Eagle Ave.)	To Be Obtained
Rice Creek Watershed District	Water Quality Plan Approval	To Be Obtained
Rice Creek Watershed District	Wetland Conservation Act	To Be Obtained
Vadnais Lake Area Water Management Org.	Water Quality Plan Review	To Be Obtained
Minnesota Pollution Control Agency (MPCA)	NPDES/SDS Construction Stormwater Permit	To Be Obtained
	Sanitary Sewer Extension	To Be Obtained
Minnesota Department of Labor & Industry	Plumbing Plan Review	To Be Obtained
Minnesota Department of Health	Food Service	To Be Obtained
Minnesota Department of Transportation	Traffic Signal Installation/Modification	To Be Obtained

Several of the permits will involve requirements for mitigation to offset the environmental impacts. Therefore, the City of White Bear Lake finds that the environmental effects of the project are subject to mitigation by ongoing regulatory authority.

3.3.4 Extent to Which Environmental Effects can be Anticipated and Controlled as a Result of Other Available Environmental Studies Undertaken by Public Agencies or the Project Proposer, Including other EISs

The City of White Bear Lake finds:

1. The proposed project includes various measures to reduce adverse impacts to the environment and existing natural resources.
2. The project is subject to local, regional, state, and federal requirements.
3. The project proposed (ISD #624) and/or developer will secure all necessary permits and will adhere to all requirements of the permits.
4. Considering the results of environmental review and permitting processes for similar projects, the City of White Bear Lake finds that the environmental effects of the project can be adequately anticipated, controlled, and mitigated.

4.0 CONCLUSIONS

1. The of White Bear Lake has jurisdiction in determining the need for an environmental impact statement on this project.
2. All requirements for environmental review of the proposed project have been met.
3. The EAW and the permit development processes to date related to the project have generated information which is adequate to determine whether the project has the potential for significant environmental effects.
4. Areas where potential environmental effects have been identified will be addressed during further site design and permitting. Mitigative measures will be incorporated into project design and have been or will be coordinated with permitting agencies.
5. Based on the criteria in Minnesota Rules part 4410.1700, subp. 7, the project does not have the potential for significant environmental effects.
6. An Environmental Impact Statement is not required for the White Bear Lake (ISD #624) High School Expansion Project.
7. Any findings that might properly be termed conclusions and any conclusions that might properly be called findings are hereby adopted as such.

Based on the Findings of Fact and Conclusions contained herein and on the entire record:

The City of White Bear Lake hereby determines that the ISD #624 High School Expansion Project, located in the City of White Bear Lake, Ramsey County, will not result in significant environmental impacts, and that the project does not require the preparation of an environmental impact statement.

City Council concurrence by Resolution No. 6-21, declaring a negative need for an Environmental Impact Statement, is included in Appendix B.

Pursuant to Minnesota Rules Part 4410.1700, Subpart 5, a copy of this RGU Record of Decision is being provided, within 5 days, to all persons on the MEQB Distribution List, to persons commenting and to persons who requested a copy. This Record of Decision will also be made available on the City of White Bear Lake's website and the ISD#624 website.

For the City of White Bear Lake

Ellen Hiniker
White Bear Lake City Manager

April 16, 2021

Date

APPENDIX A – EAW Publication and Notification Materials

- **EQB Notice of Availability**
- **EAW Distribution List**
- **EAW Distribution Letter**
- **Media Release Provided to White Bear Press**

EQB Announcement

EQB wants to hear from you! Integrating climate information into the Environmental Review Program

The Environmental Quality Board (EQB) is considering changes to integrate climate information into the Environmental Review Program. EQB would like input on draft recommendations before making final decisions on any program changes. Learn more about the project and how you can participate by visiting EQB's [Climate Change and Environmental Review webpage](#). There will be opportunities to participate throughout the spring. Updates will be posted on the website and in the *EQB Monitor*.

Environmental Assessment Worksheets

White Bear Lake Independent School District (ISD #624) High School Expansion

Comment Deadline: March 4, 2021

Project Description: White Bear Lake School District (ISD) 624 proposes to redevelop an approximately 90-acre site located in the City of White Bear Lake. The site currently serves as the District's North Campus High School (serving Grades 9th & 10th) and Central Middle School (serving Grades 6 through 8). The proposed school expansion at the North Campus site will create a single campus high school building serving all ISD students in Grades 9 through 12. The proposed project includes a 397,977 sq./ft. expansion of new institutional building space (classrooms, office, storage, gymnasium, theater, and other accessory/common areas). Other site features will include internal access roads, parking lots, sidewalks, stormwater management features, athletic/activity field improvements, and utility infrastructure for the expanded school and ancillary uses. The property is bound by Bald Eagle Avenue (west), Division Avenue (east), Central Middle School (south) and the Canadian Pacific Rail corridor (north).

Link to Document: <https://www.isd624.org/about/building-our-future>

RGU: City of White Bear Lake

RGU Contact: Anne Kane, 651-429-8562, akane@whitebearlake.org

EAW Distribution List

Agency/Organization	Distribution #	Submission
State Agencies		
Environmental Quality Board	1 copy (electronic)	Online Submission Form at: www.eqb.state.mn.us/eqb-monitor
Department of Agriculture	1 copy (electronic)	becky.balk@state.mn.us
Department of Commerce	1 copy (electronic)	raymond.kirsch@state.mn.us
Department of Health	1 copy (electronic)	health.review@state.mn.us
Department of Natural Resources	1 copy (electronic)	jill.townley@state.mn.us
Pollution Control Agency	1 copy (electronic)	dan.card@state.mn.us
Board of Water & Soil Resources	1 copy (electronic)	annie.felix-gerth@state.mn.us
Department of Transportation	1 copy (electronic)	debra.moynihan@state.mn.us
State Archaeologist	1 copy (electronic)	mn.osa@state.mn.us
Indian Affairs Council	1 copy (electronic)	melissa.cerda@state.mn.us
Historic Preservation Office	1 copy (electronic)	envreviewshpo@state.mn.us
Metropolitan Council	1 copy (electronic)	reviewscoordinator@metc.state.mn.us
Libraries		
Environmental Conservation Library	1 copy (electronic)	govdoc@hclib.org
Ramsey County/White Bear Lake Public Library	1 hardcopy	2150 2nd Street, St. Paul MN 55110
Federal Agencies		
U.S. Fish & Wildlife Service	1 copy (electronic)	peter_fasbender@fws.gov
U.S. Army Corps of Engineers	1 copy (electronic)	mvp-reg-inquiry@usace.army.mil
U.S. Environmental Protection Agency	1 copy (electronic)	westlake.kenneth@epa.gov
Local Agencies		
Rice Creek Watershed District	1 copy (electronic)	ntomczik@ricecreek.org
Vadnais Lake Area Water Management Organization	1 copy (electronic)	office@vlawmo.org
City of Birchwood	1 copy (electronic)	info@cityofbirchwood.com
City of Gem Lake	1 copy (electronic)	gloria.tessier@gemlakemn.org
City of Hugo	1 copy (electronic)	riuba@ci.hugo.mn.us
City of Vadnais Heights	1 copy (electronic)	nolan.wall@cityvadnaisheights.com
White Bear Township	1 copy (electronic)	wbt@whitebeartownship.org
RGU and Proposer		
City of White Bear Lake - RGU	1 copy (electronic)	akane@whitebearlake.org
ISD 624 - Proposer	1 copy (electronic)	tim.wald@isd624.org
City of WBL - Added Agencies		
White Bear Center for the Arts	1 copy (electronic)	Suzi Hudson <shudson@whitebeararts.org>
Lakeshore Players Theater	1 copy (electronic)	Rob Thomas <office@lakeshoreplayers.org>
Children's Performing Arts	1 copy (electronic)	Sharon Hanifl-Lee <sharonh@childrensperformingartsmn.org>
Ramsey County - Public Works	1 copy (electronic)	Schoenecker, Ted <ted.schoenecker@CO.RAMSEY.MN.US>
Ramsey County Regional Rail Authority	1 copy (electronic)	Gitzlaff, Andrew J (andrew.gitzlaff@CO.RAMSEY.MN.US)
Ramsey County - Parks and Recreation	1 copy (electronic)	Yonke, Scott <scott.yonke@co.ramsey.mn.us>
White Bear Area Historical Society	1 copy (electronic)	Sara Hanson <sara@whitebearhistory.org>
White Bear Lake Conservation District	1 copy (electronic)	Bryan DeSmet <bdesmet@wbclcd.org>

EAW Distribution Letter



Building a Better World
for All of Us®

January 27, 2021

RE: EQB Distribution List Members
White Bear Lake School District High
School Expansion Project

This EAW notice of availability is being sent on behalf of the White Bear Lake School District (project proposer) and City of White Bear Lake (RGU). The proposed project involves the redevelopment of an approximately 90 acres site that includes the School District's North Campus High School and Central Middle School. The site improvements include a proposed 397,977 square foot expansion of new institutional building space (classrooms, office space, theater, gymnasium, storage, and other accessory/common areas) at the North Campus building site. Other planned improvements include new internal access roads, parking lots, sidewalks, stormwater management features, athletic/activity field improvements, and utility infrastructure for the expanded school.

An Environmental Assessment Worksheet (EAW) has been prepared and will be available for public and agency review beginning Tuesday, February 2, 2021. The EAW documents the purpose of the project along with the anticipated social, economic, and environmental effects. The EAW is available for online review at the School District's "[Building Our Future Facilities Process](#)" website.

Copies of the EAW are being distributed to agencies on the current Minnesota Environmental Quality Board (EQB) Distribution list and to other local agencies. The deadline for submitting comments is Friday, March 5, 2021. Because the City of White Bear Lake is considered the Regulatory Governmental Unit for the EAW, all comments should be directed to:

Anne Kane
White Bear Community Development Director
White Bear Lake City Offices
4707 Highway 61
White Bear Lake, MN 55110
e-mail at: akane@cwhitebearlake.org

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Robert Rogers, AICP
SEH, Sr. Planner

cc: Anne Kane, White Bear Lake Community Development Director
Tim Wald, ISD 624, Asst. Superintendent for Finance and Operations

Engineers | Architects | Planners | Scientists

Short Elliott Hendrickson Inc., 3535 Vadnais Center Drive, St. Paul, MN 55110-3507

SEH is 100% employee-owned | sehinc.com | 651.490.2000 | 800.325.2055 | 888.908.8166 fax

MEDIA RELEASE

FOR IMMEDIATE USE – January 25, 2021

WHITE BEAR LAKE SCHOOL DISTRICT (ISD#624): HIGH SCHOOL EXPANSION PROJECT



White Bear Lake, MN – The White Bear Lake Independent School District (ISD #624) proposes to redevelop an approximately 90 acres site that includes the School District's North Campus and Central Middle School. The site improvements include a proposed 397,977 square foot expansion of new institutional building space (classrooms, office space, theater, gymnasium, storage, and other accessory/common areas) at the North Campus building site. Other planned improvements will feature new internal access roads, parking lots, sidewalks, stormwater management features, athletic/activity field improvements, and utility infrastructure for the expanded school. The property is bound by Bald Eagle Avenue (west), Division Avenue (east), Central Middle School (south) and the Canadian Pacific Railroad corridor (north).

As part of the planning and design phase of project development, an Environmental Assessment Worksheet (EAW) has been prepared and will be available for public and agency review beginning Tuesday, February 2, 2021. The EAW documents the purpose of the project along with the anticipated social, economic, and environmental effects. The EAW is available for online review at the School District's "*Building Our Future Facilities Process*" website at: <https://www.isd624.org/about/building-our-future>. A hardcopy of the EAW is also available for public viewing at the White Bear Lake Public Library, located at 2150 2nd Street, White Bear Lake, MN 55110.

The deadline for submitting comments is March 5, 2021. Because the City of White Bear Lake is considered the Regulatory Governmental Unit for the EAW, all comments should be directed to: Anne Kane, White Bear Community Development Director, White Bear Lake City Offices, 4707 Highway 61, White Bear Lake, MN 55110 or via e-mail at: akane@cwhitebearlake.org

To request this document in an alternative format, please contact the Affirmative Action Office at 651-366-4718 or call 1-800-657-3774 (Greater Minnesota). For Minnesota Relay, call 711 or 1-800-627-3529. You may also send an e-mail to ADArequest.dot@state.mn.us. (Please make your request at least one week in advance).

APPENDIX B - EAW Comments and Responses

The EAW for the ISD #624 High School Expansion Project was distributed on February 2, 2021 to agencies and organizations on the official distribution list, as well as additional agencies/ organizations that had either requested a copy of the document, and/or that could be affected by the proposed project. The comment period for the EAW officially started on February 2, 2021 and closed at the end of the business day on March 5, 2021.

During the agency and public review and comment period, the City of White Bear Lake received comments on the EAW from 1 federal agency, 3 state agencies, and 3 regional agencies. No comments were received from the public.

Consistent with state environmental review rules, substantive comments received are responded to in this appendix, as part of the Findings of Fact and Conclusions for the project record. Specifically, responses have been prepared for substantive statements pertaining to analysis conducted for and documented in the EAW, including incorrect, incomplete, or unclear information; permit requirements; content requirements. These comments and responses are included on the following pages. Written comments agreeing with the EAW project information, general opinions, statements of fact, or statements of preference were not formally responded to, but are also included.


Comments and Responses to Those Comments

This section contains the comments and written responses to all comments received from the following individuals/agencies during the public comment period:

- US Army Corps of Engineers
- Minnesota Department of Transportation
- Ramsey County Public Works Department
- Metropolitan Council
- Vadnais Lake Area Water Management Organization
- Minnesota Pollution Control Agency
- Minnesota Department of Natural Resources

US Army Corps of Engineers Comments	Response
<hr/> <p>From: White, Eric J CIV USARMY CEMVP (USA) <Eric.J.White@usace.army.mil> Sent: Tuesday, February 2, 2021 1:53 PM To: Anne Kane <akane@whitebearlake.org> Subject: MVP-2020-00625-EJW</p> <p>Hi Anne,</p> <p>As per our phone call just now, I wanted to see if you needed anything from the Corps from the EAW we'd received. It looks like we'd sent a delineation concurrence for the site on 6/15/2020. If you have any questions, feel free to call or email me.</p> <p>Thanks, Eric</p> <hr/> <p>Eric White Biologist US Army Corps of Engineers St. Paul District Office 180 5th Street E St. Paul, Minnesota 55101 651-290-5357 (office)</p> <p>Information on Corps of Engineers Regulatory Program status during the COVID-19 pandemic can be found at: https://www.mvp.usace.army.mil/missions/regulatory <https://www.mvp.usace.army.mil/missions/regulatory></p>	<p>1. Comment noted. No response required.</p>


MnDOT Comments (page 1 of 2)	Response
<div data-bbox="111 228 468 277" data-label="Image"> </div> <div data-bbox="753 222 951 280" data-label="Text"> <p>Metropolitan District 1500 County Road B-2 West Roseville, MN 55113</p> </div> <p data-bbox="111 305 260 326">February 26, 2021</p> <p data-bbox="111 375 348 487">Wayne Kazmierczak Superintendent White Bear Lake ISD 624 4855 Bloom Ave White Bear Lake, MN 55110</p> <p data-bbox="111 511 600 623">SUBJECT: White Bear Lake ISD High School Expansion MnDOT Review #EAW21-002 US 61, 4th St to Buffalo St Control Section: 6222 White Bear Lake, Ramsey County</p> <p data-bbox="111 647 329 669">Dear Wayne Kazmierczak,</p> <p data-bbox="111 693 947 849">Thank you for the opportunity to review the Environmental Assessment Worksheet (EAW) for White Bear Lake Independent School District 624 High School Expansion Project, received 1/29/21. Please note that the Minnesota Department of Transportation's (MnDOT) review of this EAW does not constitute approval of a regional traffic analysis and is not a specific approval for roadway modifications. As plans are refined, we would like the opportunity to meet with the relevant partners and review the updated information. MnDOT staff has reviewed the document; many past comments have been addressed.</p> <p data-bbox="111 873 270 894"><i>Pedestrian/Bicycle</i></p> <p data-bbox="111 898 945 1055">MnDOT commends the commitment to improve the non-motorized connections to the school campus in keeping students safe and lowering vehicle trips. We emphasize the importance of building these connections. Additionally, please consider creating a public direct east-west non-motorized connection through the campus. Ideally this would line up with crossing opportunities at US 61 and the railroad and would include minimal conflict points with the campus' internal vehicle traffic. US 61, the railroad, and the White Bear Lake school campus create a significant north-south barrier that limits east-west travel for pedestrians and bicyclists.</p> <p data-bbox="111 1079 858 1123">Please contact Jesse Thorsen, MnDOT Pedestrian and Bicycle Planning, at 651-234-7788 or jesse.thorsen@state.mn.us with any questions.</p> <p data-bbox="111 1148 327 1169"><i>Review Submittal Options</i></p> <p data-bbox="111 1172 940 1216">MnDOT's goal is to complete the review of documents within 30 days. Submittals sent in electronically can usually be turned around faster. In order of preference, please submit either:</p> <ol data-bbox="142 1240 913 1330" style="list-style-type: none"> 1. Email documents in PDF format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. If multiple emails are necessary, number each message. 2. Upload PDF file(s) to MnDOT's external shared internet workspace site at: https://mft.dot.state.mn.us. Contact MnDOT Planning development review staff at <p data-bbox="432 1370 627 1386">An equal opportunity employer</p>	<ol style="list-style-type: none"> 1. ISD #624 will continue to coordinate all transportation improvements with all roadway jurisdictions including MnDOT, City of White Bear Lake, and Ramsey County. 2. ISD #624 recognizes the importance of providing safe and efficient non-motorized transportation facilities. The existing east-west trail/sidewalk facility located in the central portion of the site area will remain in-place. From the west, this pedestrian/bicycle facility begins at the intersection of Bald Eagle Avenue and 9th Street. It continues east and wraps around the Central Middle School (CMS) building where it connects to other sidewalks on the school property. The system is planned to connect to a new sidewalk along 8th Street east of CMS as part of roadway improvements along 8th Street between Bloom Avenue and Highway 61. 3. ISD #624 acknowledges the review/submittal requirements and will continue to work with MnDOT and other stakeholders as transportation improvements are designed and planned for construction.


MnDOT Comments (page 2 of 2)	Response
<p>Page 2 of 2</p> <p>metrodevreviews.dot@state.mn.us for access instructions and send an email listing the file name(s) after the document(s) has/have been uploaded.</p> <p>You are welcome to contact me at 651-234-7792, or david.kratz@state.mn.us with any questions.</p> <p>Sincerely,</p> <div data-bbox="130 470 401 542">  <div> Digitally signed by David Kratz Date: 2021.02.26 13:27:58 -06'00' </div> </div> <p>David Kratz Senior Planner</p> <p>Copy sent via email:</p> <div> <div> Jason Swenson, Water Resources Buck Craig, Permits Mike Lynch, Right of Way Ashley Roup, Traffic Jason Junge, Transit Melissa Barnes, Area Manager Jennifer Wiltgen, Area Coordinator Mackenzie Turner Barger, Ped/Bike </div> <div> Jesse Thorsen, Ped/Bike Lance Schowalter, Design Dave Cowan, Safe Routes to School Cameron Muhic, Planning Tod Sherman, Planning Russell Owen, Metropolitan Council Anne Kane, White Bear Lake </div> </div>	<p>See response on previous page</p>




Ramsey County Comments (page 1 of 3)	Response
<p style="text-align: center;">White Bear Lake High School Expansion EAW Traffic Study Findings Memorandum Dated January 11, 2021: Ramsey County Comments March 1, 2021</p> <p>1. Install traffic signal at the intersection of Highway 61 and 8th Street.</p> <p style="color: red;">Ramsey County supports this recommendation which is needed for the future Rush Line BRT project and to also manage traffic flow in and out of the school campus site.</p> <p>2. Stagger High School and Middle School start times by 30 minutes.</p> <p style="color: red;">Ramsey County appreciates this recommendation which will help manage traffic flow around the school campus.</p> <p>3. Optimize signal timing along Highway 61.</p> <p style="color: red;">Ramsey County supports this recommendation which is needed to provide a transit advantage for the future Rush Line BRT project and to also manage traffic flow in and out of the school campus site.</p> <p>4. Add a leading eastbound protected phase at the intersection of Highway 61 at Buffalo Street.</p> <p style="color: red;">Ramsey County supports this recommendation which will help traffic operations at this intersection. However, the County is concerned about the forecasted queuing of traffic at school departure time at the atypical Highway 61/Buffalo Street/Hugo Road intersection and believes additional solutions need to be explored. The close spacing of Hugo Road, the Minnesota Commercial Railroad and Highway 61 further complicate traffic operations and potential design solutions at this location. As traffic queues become increasingly worse over time along Hugo Road, we also expect there will be a growing community desire for bicycle and pedestrian safety improvements along this corridor.</p> <p>5. Convert the intersection of Division Avenue at 8th Street to an all-way stop (or mini-roundabout controlled) intersection.</p> <p style="color: red;">Ramsey County supports exploration of intersection traffic operations and safety improvements at this location, including consideration of a potential mini roundabout.</p>	<p>1. ISD #624 acknowledges Ramsey County’s support for the proposed transportation mitigation commitments stated in the EAW and comment letter provided. The School District and the consultant team will continue to work with Ramsey County and other stakeholders as transportation improvements are further designed and planned for construction.</p>



Ramsey County Comments (page 2 of 3)	Response
<p>6. Improve the cross-section of 8th Street between Highway 61 and Division Avenue for better operations and add a sidewalk on the south side of the road (no lane expansion planned).</p> <p>Ramsey County supports the proposed two-lane cross-section improvements along 8th Street, including the proposed sidewalk along the south side of the road which will improve multimodal accessibility to the future Rush Line BRT along Highway 61.</p> <p>7. Provide dedicated right and left turn lanes into the school site at the pick-up/drop-off access on Division Avenue and the main access on Bald Eagle Avenue.</p> <p>New school access proposed along Bald Eagle Avenue (CSAH 67) will require approval by Ramsey County and adherence to Ramsey County access management guidance. A gate or some type of controlled access will be required for the Bald Eagle Avenue access so use of this access can be restricted to bus arrival and departure traffic only.</p> <p>Dedicated turn lanes at Bald Eagle Avenue may impact the proposed Bruce Vento trail route along Bald Eagle Avenue. Additional coordination with Ramsey County will be necessary regarding the interrelation of this proposed trail project and turn lane project.</p> <p>8. Provide improved accessibility and safety for pedestrians and bicyclists in the school site area:</p> <ul style="list-style-type: none"> - Add sidewalk/trail along south side of 8th Street - Add sidewalk/trail along east side of Bald Eagle Avenue - Add sidewalk/trail along west side of Division Avenue - Add mid-block crossing to connect sidewalk on west side of Division Avenue to the planned White Bear Lake Art Center - Mark all crosswalks along Division Avenue and Bald Eagle Avenue at all stop-controlled locations - Any uncontrolled marked crosswalks along Division Avenue and Bald Eagle Avenue should have crosswalk warning advance warning signs - Any uncontrolled pedestrian crossings north of the school on Division Avenue and Bald Eagle Avenue should be further investigated with a sidewalk feasibility study <p>Ramsey County supports the multimodal improvements outlined above. Stillwater Street (CR 86) should be added to this list for a future trail, as outlined in the Ramsey County Bike and Pedestrian Plan for a future trail.</p> <p>Bald Eagle Avenue is the preferred route for the future Bruce Vento Trail and Division Avenue is the alternate route. Crosswalk and pedestrian crossing improvements along Bald Eagle Avenue and Division Avenue should be coordinated with Ramsey County and Canadian Pacific Railroad. Additional bicycle and pedestrian improvements and marked pedestrian crossings should also be considered in the defined walking radius of the school campus, as necessary, to ensure student safety.</p> <p>9. All buses enter and exit the high school site off Bald Eagle Avenue.</p> <p>See comment under #7.</p> <p>10. Assign student parking permits.</p>	<p>1. See response on previous page.</p> <p>2. Further design and permitting of the proposed access and turn lanes along Bald Eagle Avenue (CSAH 67) will be coordinated with Ramsey County Public Works Department. The inclusion of a gate will be further discussed with the County and representatives from White Bear Lake as restricting access to the site was raised as a concern by the City Police/Fire Department.</p> <p>3. ISD #624 acknowledges that Stillwater Street (CR 86) is identified in Ramsey County’s Bike and Pedestrian Plan for a future trail.</p> <p>4. ISD #624 is aware of the ongoing planning for the future Bruce Vento Trail along Bald Eagle Ave (preferred route) or Division Avenue (alternative route). The planned sidewalk improvements, including crosswalk signage/markings, along these roadways will be coordinated with Ramsey County, the City of White Bear Lake, and the CP Railroad.</p> <p>5. Comment noted. The School District is committed to ongoing coordination Ramsey County regarding planned transportation improvements, parking facilities, and future site operations during school days/hours as well as special event conditions.</p>


Ramsey County Comments (page 3 of 3)	Response
<p data-bbox="107 272 869 342">Ramsey County supports management of parking on the site and City/School District promotion of faculty, students, parents and community members to carpool and utilize the Rush Line Bus Rapid Transit (BRT) scheduled to begin service in 2026.</p> <p data-bbox="107 363 869 407">It would be helpful to talk further about student, staff and special event parking and how the site design directs non-bus vehicles to enter and exit the site.</p> <div data-bbox="984 264 1041 418"><div></div><div>5</div></div>	<p data-bbox="1184 245 1604 272">5. See response on previous page.</p>

Met Council Comments (page 1 of 2)	Response
<p>March 3, 2021</p> <p>Ms. Anne Kane Community Development Director City of White Bear Lake 4707 Highway 61 White Bear Lake, MN 55110</p> <p>RE: City of White Bear Lake Environmental Assessment Worksheet (EAW) – ISD 624 High School Expansion Project Metropolitan Council Review No. 22530-1 Metropolitan Council District No. 11</p> <p>Dear Ms. Kane:</p> <p>The Metropolitan Council received the EAW for the ISD 624 High School Expansion Project in the City of White Bear Lake on February 2, 2021. The proposed project is located at 5045 Division Avenue. The proposed project involves the redevelopment of an approximately 90 acre site that includes the School District's North Campus High School and Central Middle School. The site improvements include a proposed 397,977 square foot expansion of new institutional building space (classrooms, office space, theater, gymnasium, storage, and other accessory/common areas) at the North Campus building site. Other planned improvements include new internal access roads, parking lots, sidewalks, stormwater management features, athletic/activity field improvements, and utility infrastructure for the expanded school.</p> <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> <p>Item 8– (Permits and Approvals Required) (Roger Janzig, ES, roger.janzig@metc.state.mn.us) The EAW reflects a proposed project that may have an impact on multiple Metropolitan Council Interceptors in multiple locations (including forcemain 8023 within Bald Eagle Avenue right-of-way, west of the proposed project and also, north of this proposed project). To assess the potential impacts to our interceptor system, prior to initiating this project, preliminary plans (including the method and means of providing wastewater service to the proposed expansion area for this project) need to be sent to Tim Wedin, Interceptor Engineering Assistant Manager (651-602-4571) at the Metropolitan Council Environmental Services.</p> <p>Item 11 (Water, Stormwater.) (Cameron J. Bailey, 651-602-1212) Council staff recommends that the developers and the City consider incorporating green roofs as a complementary stormwater feature for the proposed 14.3 acres of additional impervious surface area due to expanded buildings, parking areas, roads, and sidewalks. The MPCA's online Minnesota Stormwater Manual offers guidance for designing and calculating stormwater retention and detention values. The Council's</p> <div data-bbox="71 1185 945 1380"> <p>390 Robert Street North Saint Paul, MN 55101-1805 P. 651.602.1000 TTY. 651.291.0904 metrocouncil.org <i>An Equal Opportunity Employer</i></p>  <p>METROPOLITAN COUNCIL</p> </div>	<ol style="list-style-type: none"> 1. A detailed construction plans are developed, ISD#624 will coordinate with the Met Council on proposed utility improvements associated with the expanded school project. 2. Green roofs are not currently planned as we are trying to preserve roof space for future solar arrays. Stormwater will be managed on grade or below grade with infiltration basins in accordance with City watershed and MPCA requirements.

Met Council Comments (page 2 of 2)	Response
<p>Surface with Purpose Tool offers technical assistance for projecting green roof stormwater retention capabilities. Doing so is not only an excellent complementary stormwater management system mechanism, but also support another opportunity for climate change, and Greenhouse Gas (GHG) mitigation and adaptation listed by the applicant in section "16. Air: Use energy efficient building materials that reduce needs for heating and cooling."</p> <p>Item 16 (Air, Stationary Source & Vehicle Emissions) (Cameran J. Bailey, 651-602-1212) This section of the application discusses and lists various "Opportunities for climate change, and GHG mitigation and adaptation." Council staff recommend including the following additional opportunity strategies:</p> <ul style="list-style-type: none"> • Install on-site renewable energy systems as rooftop and/or car canopy systems, • Install green roof systems as rooftop and/or car canopy systems • Install combined solar + green roof systems as rooftop and/or car canopy systems. <p>Solar energy from sunlight is as much a natural resource as water and vegetation. Including these strategies would also be in alignment with resilience strategies in the City of White Bear Lake's 2040 comprehensive plan:</p> <ul style="list-style-type: none"> • <i>"Promote emerging renewable energy technologies.</i> • <i>The City allows solar panels as an accessory use in all districts.</i> • <i>Taller systems, such as car canopy style, would be welcomed on commercial or industrial properties with proper design through the variance process for height.</i> • <i>Protection and enhancement of the City's natural resources and its environmental setting will assist in the City's goal of becoming more resilient in the face of an evolving climate.</i> • <i>Natural resources play a part in the resiliency of the City's public health and should be managed as any other asset.</i> • <i>Also critical to the City's resiliency is its commitment to resource conservation and environmentally sustainable operations."</i> <p>Guidance can be found in the Great Plains Institute's "Becoming Electric Vehicle Ready" guideline document.</p> <p>This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Jake Reilly, Principal Reviewer, at jake.reilly@metc.state.mn.us.</p> <p>Sincerely,</p>  <p>Angela R. Torres, AICP, Manager Local Planning Assistance</p> <p>CC: Robert Rogers, AICP, SEH Tim Wald, ISD 624, Asst. Superintendent for Finance and Operations Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division Susan Vento, Metropolitan Council District 11 Jake Reilly, Sector Representative Reviews Coordinator</p> <p><small>N:\CommDev\LPA\Communities\White Bear Lake\letters\White Bear Lake 2021 22530-1 EAW_Okwccomments.docx</small></p> <p><small>Page -2 March 4, 2021 METROPOLITAN COUNCIL</small></p>	<p>2. See response on previous page.</p> <p>3. New building structure and systems are designed to allow for solar panels to be installed in the future. Accommodations for future vehicle charging stations are also being incorporated.</p>


Comments	Response
<div data-bbox="117 228 365 326">  </div> <div data-bbox="554 217 886 326">  <p>800 County Road E East, Vadnais Heights, MN 55127 www.vlawmo.org office@vlawmo.org (651) 204-6070</p> </div> <p>March 4, 2021</p> <p>Anne Kane, White Bear Lake Community Development Director White Bear Lake City Offices 4701 Highway 61 White Bear Lake, MN 55110</p> <p>RE: White Bear Lake High School Expansion Project Environmental Assessment Worksheet (EAW) Vadnais Lake Area WMO Review</p> <p>Dear Anne Kane:</p> <p>The Vadnais Lake Area WMO (VLAWMO) received the EAW for the White Bear Lake High School Expansion Project in White Bear Lake on February 6, 2021. The White Bear Lake Independent School District (ISD) 624 proposes to redevelop an approximately 90-acre site located in the City of White Bear Lake. The site currently serves as the District's North Campus High School (serving Grades 9th & 10th) and Central Middle School (serving Grades 6th through 8th). The proposed school expansion at the North Campus site will create a single campus high school building serving all ISD students in Grades 9th through 12th.</p> <p>The staff review finds that the EAW does not raise issues of consistency with VLAWMO policy and standards.</p> <p>We offer the following comments for your consideration,</p> <div data-bbox="138 841 915 902"> <p>Item 8. Permits and Approvals Required: The City of White Bear Lake has adopted the Vadnais Lake Area WMO (VLAWMO) Water Management Standards & Policies and will be the permitting authority for VLAWMO on water quality and stormwater.</p> </div> <div data-bbox="138 922 915 1045"> <p>This project is in both the Vadnais Lake Area WMO as well as Rice Creek Watershed District (RCWD). The VLAWMO is not a permitting agency, but does administer the Wetland Conservation act. Most of the wetland and proposed wetland impact on the project site lies within the Rice Creek Watershed District boundary; therefore, the Rice Creek Watershed District will be the lead on all Wetland Conservation Act (WCA) activities and will act as the Local Government Unit (LGU) for both agencies (VLAWMO & RCWD) on this project.</p> </div> <div data-bbox="138 1065 915 1107"> <p>Item 11. B. 3. ii - Water Resources: City of White Bear Lake development and stormwater standards and requirements are being used which meet or exceed VLAWMO standards adopted by the City.</p> </div> <div data-bbox="138 1127 915 1169"> <p>Item 11. B. 3. Iv. a - Water Resources- wetlands: See comment above (Item 8. Permits and Approvals Required)</p> </div> <div data-bbox="138 1188 915 1250"> <p>Item 13. Fish, wildlife, plant communities, and sensitive ecological resources (rare features) The EAW shows the project proposers are thoughtfully considering impacts to the existing site and making efforts to avoid, minimize and mitigate adverse effects to ecological communities.</p> </div> <div data-bbox="940 922 982 1234"> <p>1</p><p>2</p><p>3</p><p>4</p> </div> <div data-bbox="84 1308 915 1391">  </div>	<ol style="list-style-type: none"> 1. Comment noted. All permits and requirements will 2. All development standards will be met, and all permits will be obtained prior to the commencement of construction. 3. See response to Comment 1 above. 4. Comment noted, no further response.

Comments	Response
<div data-bbox="109 217 357 310">  </div> <div data-bbox="583 220 879 285"> <p>800 County Road E East, Vadnais Heights, MN 55127 www.vlawmo.org office@vlawmo.org (651) 204-6070</p> </div> <div data-bbox="119 339 890 402"> <p>Partnership. We encourage the school district to partner with VLAWMO and the City of White Bear Lake to look at possible opportunities to go over and above current stormwater standards to enhance BMP's on this project.</p> </div> <div data-bbox="63 417 913 479"> <p>This concludes the Vadnais Lake Area WMO's (VLAWMO) review of the EAW. The VLAWMO will not take formal action on the EAW. If you have any questions or need further information, please contact Brian Corcoran at 651-204-6075.</p> </div> <div data-bbox="63 493 151 519"> <p>Sincerely,</p> </div> <div data-bbox="88 535 262 571">  </div> <div data-bbox="63 591 193 615"> <p>Brian Corcoran</p> </div> <div data-bbox="976 350 997 378"> <p>5</p> </div>	<p>5. ISD #624 is committed to coordination with local agencies on the project design and permitting.</p>

Comments	Response
<p>  520 Lafayette Road North St. Paul, Minnesota 55155-4194 651-296-6300 800-657-3864 Use your preferred relay service info.pca@state.mn.us Equal Opportunity Employer </p> <p>March 3, 2021</p> <p> Anne Kane Community Development Director City of White Bear Lake 4701 Highway 61 White Bear Lake, MN 55110 </p> <p>Re: ISD 624 High School Expansion Project Environmental Assessment Worksheet</p> <p>Dear Anne Kane:</p> <p>Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the ISD 624 High School Expansion project (Project) in the city of White Bear Lake, Ramsey County, Minnesota. The Project consists of expansion of the North Campus High School. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.</p> <p><u>Water Resources (Item 11)</u></p> <p><i>Wastewater</i></p> <ul style="list-style-type: none"> The EAW should include design wastewater flow calculations for average daily flow and peak flow. The volume of 61,000 gallons per day of wastewater flow is provided, but it is not clear if that is the volume of flow expected due to the expansion or the total of both the existing flow and the expansion. The EAW should include an itemization of how the flow was determined for the existing flow and the expansion such as flow per student, faculty, stadium, etc. A map showing existing sewer connection points and the proposed locations would be helpful. <p><i>Stormwater</i></p> <ul style="list-style-type: none"> Please note that because the Project will disturb greater than 50 acres and discharges to impaired waters, the Stormwater Pollution Prevention Plan will require review and approval from the MPCA prior to National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater Permit (CSW Permit) issuance. The EAW mentions mitigation opportunities to address climate change including constructing energy efficient buildings, revegetating open areas with prairie and smart irrigation. The CSW Permit requires volume reduction of stormwater to be considered first, which can also increase resiliency to climate change. The Project proposer is encouraged to consider using the stormwater retention basins for water reuse as a volume reduction practice, both for irrigation and toilet flushing. Incorporating a green roof can help to achieve volume reduction requirements and also reduce building energy use. Use of permeable pavement is also encouraged to reduce stormwater volume. Please direct questions regarding CSW Permit requirements to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us. 	<ol style="list-style-type: none"> Sanitary flow calculations and existing/proposed sewer connections for the White Bear High School site are included in Appendix C. The 61,000 gallons per day listed in the EAW is the final flow volume including the existing building flows. The flow calculations have been based on 20 gallons per day for school use with cafeterias and lockers rooms. The calculated flows were also compared to the existing high school water usage. Comment noted. The SWPPP will be submitted for review as required. With construction phasing it is anticipated that a maximum of 15-20 acres would be disturbed at any given time. Extensive landscaping is planned for the project, which includes creating native planted wetland buffers, shade trees throughout the site, and drought tolerant plantings. Rainwater harvesting (for building/irrigation reuse) and green roofs were reviewed and determined to not be feasible at this point in time for the project.

Comments	Response
<p>Anne Kane Page 2 March 3, 2021</p> <p>Noise (Item 17) The MPCA appreciates the review of noise related to the redevelopment of the school campus. In addition to following the hours of construction laid out in White Bear Lake city code, the MPCA recommends that all equipment be appropriately muffled during operation.</p> <p>At this time, it is unlikely that changes to noise in the area would have a significant impact on nearby residences and other receptors. It may be prudent, however, for the City and ISD 624 to be prepared to field questions or concerns from nearby residents in the case that they have noise-related complaints – particularly from an increase in traffic and the number of students in the vicinity. This consideration may be particularly important during the use of amplified noise on school grounds (like announcements or commentary during sporting events or other activities).</p> <p>It should be noted that the school facilities themselves are also considered to be a sensitive receptor, covered under the strictest level of state noise standards, Noise Area Classification 1. Construction, traffic, and other nearby noise sources should be considered in the final design of the building and athletic/activity areas on campus. Any further questions can be directed to Fawkes Char at 651-757-2327 or Fawkes.Char@state.mn.us.</p> <p>We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW, please contact me by email at Karen.kromar@state.mn.us or by telephone at 651-757-2508.</p> <p>Sincerely,</p> <p><i>Karen Kromar</i></p> <p>Karen Kromar Project Manager Environmental Review Unit Resource Management and Assistance Division</p> <p>KK:bt</p> <p>cc: Dan Card, MPCA, St. Paul Roberta Getman, MPCA, Rochester Dave Sahli, MPCA, St. Paul Fawkes Char, MPCA, St. Paul</p>	<p>3. The noise comments are noted. The general contractor will be required to ensure all construction equipment is muffled and in proper working order.</p> <p>4. The City of White Bear Lake’s decision on the need for an EIS will be distributed to all member on the EQB Distribution List, including the MPCA. This Findings of Fact and Conclusions document provides responses to all substantive comments.</p>

Comments	Response
<p>From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us> Sent: Thursday, March 4, 2021 7:33 PM To: Anne Kane <akane@whitebearlake.org> Cc: wayne.kazmierczak@isd624.org Subject: White Bear Lake ISD# 624 High School Expansion Project EAW - DNR comments</p> <p>Dear Anne Kane,</p> <p>Thank you for the opportunity to review the White Bear Lake ISD# 624 High School Expansion Project EAW. The DNR respectfully submits the following comments for your consideration.</p> <ol style="list-style-type: none"> 1. Page 5, Permits and Approval Required. Dewatering in volumes that exceed 10,000 gallons per day, or one million gallons per year, from storm water, ground water or surface water, requires the approval of a DNR Water Appropriation Permit. This includes dewatering necessary to construct utilities, buildings, and storm water facilities. A DNR Water Appropriation Permit Application may be submitted to the DNR using the Minnesota Permitting and Reporting System at: https://webapps11.dnr.state.mn.us/mpars/public/authentication/login 2. Page 9, Groundwater. Please note that the use of the Central Middle School irrigation well is approved under a DNR Water Appropriation Permit. Due to on-going legal action against the DNR, the DNR will not be allowed to increase the authorized volume of water that can be taken from the irrigation well. However, the DNR is allowed to issue DNR Water Appropriation Permits for temporary construction dewatering. 3. Page 10, Stormwater. The DNR recommends that water in the stormwater treatment facilities be used for some of the landscaping irrigation needs to the High School Expansion. 4. Page 10, Stormwater. The planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting city and school applicator participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations. 5. Page 14, Section 13.b. Please note that when using an NHIS license agreement, a letter of concurrence should be obtained from DNR Endangered Species Review Coordinator, Lisa Joyal, if rare features are identified within one mile of a project area. In this case, Blanding's turtle (<i>Emydoidea blandingii</i>), a state-listed as threatened species, was identified within the vicinity of the project. Wetland habitat suitable for Blanding's turtles is located within the project boundary. Blanding's turtles also use upland areas up to and over a mile distant from wetlands, waterbodies, and watercourses. Uplands are used for nesting, basking, periods of dormancy, and traveling between wetlands. Therefore, please use the following avoidance measures: 	<ol style="list-style-type: none"> 1. Comment noted. Dewatering more than 10,000 gpd or 1M gpy is not anticipated for the building, site basins, or site utilities construction. If it is determined that a permit is needed the contractor will be responsible to obtaining the water appropriations permit and abiding by all applicable standards. 2. Comment noted. The existing irrigation well currently serves ~10 acres of grass sports fields. Those fields are being converted to artificial turf eliminating that need for watering. The well source is planned to be used for the ornamental landscaped areas that will include native and drought tolerant plantings for no increase in water usage. 3. Rainwater harvesting (for building/irrigation reuse) was reviewed and determined to not be feasible at this point in time for the project. 4. Comment noted and the Smart Salting Training information will be shared with the School District Administration for consideration. 5. The listed Blanding's turtle minimization/avoidance measures have been reviewed and will be implemented to the extent practicable. Surmountable curb is included along many edges of the parking lots and natural netting erosion control blankets will be used on site. The Blanding's turtle information will be included in the project manual and distributed to contractors during construction.

Comments	Response
<div> <ul style="list-style-type: none"> ▪ Please distribute the attached Blanding's turtle flyer to all contractors working in the area. ▪ Please limit the use of erosion control blankets to 'bio-netting' or 'naturalnetting' types, and specifically not products containing plastic mesh netting or other plastic components. ▪ Use surmountable curbs where possible. ▪ Monitor for turtles during construction and report any sightings to the DNR Nongame Specialist, Erica Hoaglund at 651-259-5772 or Erica.Hoaglund@state.mn.us. ▪ If turtles are in imminent danger they must be moved by hand out of harm's way, otherwise they are to be left undisturbed. </div> <div> <p>6. Page 17, Dust and Odors. Please note that taking water from surface waters for dust control requires a DNR Water Appropriation Permit, if the volumes of water that is taken exceeds 10,000 gallons per day, or one million gallons of water per year. In addition, the School District or contractor must obtain permission from the owner of the property that is used for obtaining water from a surface water before they have a right to take water from the surface water sources. For small bodies of water, all of the riparian landowners will need to be informed of the intention to take water from the water body before the water is removed from the water body.</p> <p>7. The DNR is pleased that the forested area along the open wetland in the northwestern part of the property will be retained. If the school is interested in the DNR's School Forest Program for outdoor learning, they can find more info here.</p> <p>Please let me know if you have any questions.</p> <p>Thank you,</p> <p>Melissa Collins Regional Environmental Assessment Ecologist Ecological and Water Resources</p> <p>Pronouns: She/her Minnesota Department of Natural Resources 1200 Warner Road St. Paul, MN 55106 Phone: 651-259-5755 Email: melissa.collins@state.mn.us mndnr.gov</p>  </div>	<div> <p>5. See response on previous page.</p> <p>6. The project does not anticipate the need to draw water from any surrounding surface waters or the need to require a Water Appropriations Permit.</p> <p>7. Comment noted. The wetland is currently utilized for biology classes. Information on the DNR program will be passed along to the school for consideration.</p> </div>

Comments	Response
<div data-bbox="302 233 630 295" data-label="Section-Header"> <h1>CAUTION</h1> </div> <div data-bbox="115 350 438 795" data-label="Image"> </div> <div data-bbox="474 337 823 802" data-label="Image"> </div> <div data-bbox="233 844 701 946" data-label="Section-Header"> <h2>BLANDING'S TURTLES MAY BE ENCOUNTERED IN THIS AREA</h2> </div> <div data-bbox="88 964 848 1083" data-label="Text"> <p>The unique and rare Blanding's turtle has been found in this area. Blanding's turtles are state-listed as Threatened and are protected under Minnesota Statute 84.095, Protection of Threatened and Endangered Species. Please be careful of turtles on roads and in construction sites. For additional information on turtles, or to report a Blanding's turtle sighting, contact the DNR Nongame Specialist nearest you: Bemidji (218-308-2641); Grand Rapids (218-327-4518); New Ulm (507-359-6033); Rochester (507-206-2820); or St. Paul (651-259-5772).</p> </div> <div data-bbox="88 1097 848 1196" data-label="Text"> <p>DESCRIPTION: The Blanding's turtle is a medium to large turtle (5 to 10 inches) with a black or dark blue, dome-shaped shell with muted yellow spots and bars. The bottom of the shell is hinged across the front third, enabling the turtle to pull the front edge of the lower shell firmly against the top shell to provide additional protection when threatened. The head, legs, and tail are dark brown or blue-gray with small dots of light brown or yellow. A distinctive field mark is the bright yellow chin and neck.</p> </div> <div data-bbox="170 1211 770 1255" data-label="Text"> <p>BLANDING'S TURTLES DO NOT MAKE GOOD PETS IT IS ILLEGAL TO KEEP THIS THREATENED SPECIES IN CAPTIVITY</p> </div> <div data-bbox="951 1015 978 1040" data-label="Text"> <p>8</p> </div>	<div data-bbox="1056 241 2013 310" data-label="List-Group"> <ol style="list-style-type: none"> 8 Copies of the Blanding's turtle flyer will be included in the project manual and distributed to contractors during construction. </div>

Comments	Response
<p style="text-align: center;">SUMMARY OF RECOMMENDATIONS FOR AVOIDING AND MINIMIZING IMPACTS TO BLANDING'S TURTLE POPULATIONS <i>(see Blanding's Turtle Fact Sheet for full recommendations)</i></p> <ul style="list-style-type: none"> • This flyer should be given to all contractors working in the area. Homeowners should also be informed of the presence of Blanding's turtles in the area. • Turtles that are in imminent danger should be moved, by hand, out of harm's way. Turtles that are not in imminent danger should be left undisturbed to continue their travel among wetlands and/or nest sites. • If a Blanding's turtle nests in your yard, do not disturb the nest and do not allow pets near the nest. • Silt fencing should be set up to keep turtles out of construction areas. It is <u>critical</u> that silt fencing be removed after the area has been revegetated. • Small, vegetated temporary wetlands should not be dredged, deepened, or filled. • All wetlands should be protected from pollution; use of fertilizers and pesticides should be avoided, and run-off from lawns and streets should be controlled. Erosion should be prevented to keep sediment from reaching wetlands and lakes. • Roads should be kept to minimum standards on widths and lanes. • Roads should be ditched, not curbed or below grade. If curbs must be used, 4" high curbs at a 3:1 slope are preferred. • Culverts under roads crossing wetland areas, between wetland areas, or between wetland and nesting areas should be at least 36 in. diameter and flat-bottomed or elliptical. • Culverts under roads crossing streams should be oversized (at least twice as wide as the normal width of open water) and flat-bottomed or elliptical. • Utility access and maintenance roads should be kept to a minimum. • Because trenches can trap turtles, trenches should be checked for turtles prior to being backfilled and the sites should be returned to original grade. • Terrain should be left with as much natural contour as possible. • Graded areas should be revegetated with native grasses and forbs. • Vegetation management in infrequently mowed areas -- such as in ditches, along utility access roads, and under power lines -- should be done mechanically (chemicals should not be used). Work should occur fall through spring (after October 1st and before June 1st). <p style="text-align: center;">8</p> <p><small>Compiled by the Minnesota Department of Natural Resources Division of Ecological and Water Resources, Updated August 2012 Endangered Species Review Coordinator, 500 Lafayette Rd., Box 25, St. Paul, MN 55155 / 651-259-5109</small></p>	<p>8. See response on previous page.</p>

APPENDIX C – Water/Sewer Calculations and Existing/Proposed Utility Connections Map

White Bear High School

Water/Sewer Calculations

8/27/2020

Existing Review (2017-2019)

North Campus (grades 9 + 10)

	2017	2018	2019
Enrollment	1290	1247	1225
Staff	100	100	100
<i>Total</i>	<i>1390</i>	<i>1347</i>	<i>1325</i>

Expected usage: Total Gallons per Day

(@ 20 g/p/d) 27,800 26,940 26,500

Average Actual Use: (used gallons / 170 days)

(gal / day) 6,749.6 6,943 6,019

[from water meter]

76% 74% 77% (reduction from expected)

52 54 47 (estimated existing peak flow GPM)

[lift station data?]

South Campus (grades 11 + 12)

	2017	2018	2019
Enrollment	1206	1189	1280
Staff	100	100	100
<i>Total</i>	<i>1306</i>	<i>1289</i>	<i>1380</i>

Expected usage: Total Gallons per Day

(@ 20 g/p/d) 26,120 25,780 27,600

Average Actual Use: (yearly gallons / 170 school days)

(gal / day) 18,740 13,526 11,942

[from water meter]

28% 48% 57% (reduction from expected)

Proposed Conditions

[10 States Wastewater Standards]

	Opening	Full Capacity
Enrollment	2850	3476
Staff	200	240
<i>Total</i>	<i>3050</i>	<i>3716</i>

Design Total Usage: (@ 20 gal / person / day)

(gal / day) 61,000 74,320

Average Hourly Flow: (Design Use / 8 hours / 60 min)

(gal / min) 127 155

Peak Hourly Flow: $[(18+P^{.5})/(4+P^{.5})]$ *P=population in thousands

(gal / min) 437 521

[DFU] estimate

Flow (2 DFU = 1 gpm)

Existing DFU	1080	540 gpm
New Add'n DFU	1740	870 gpm
Total	2820	1410 gpm

Water Meter Readings

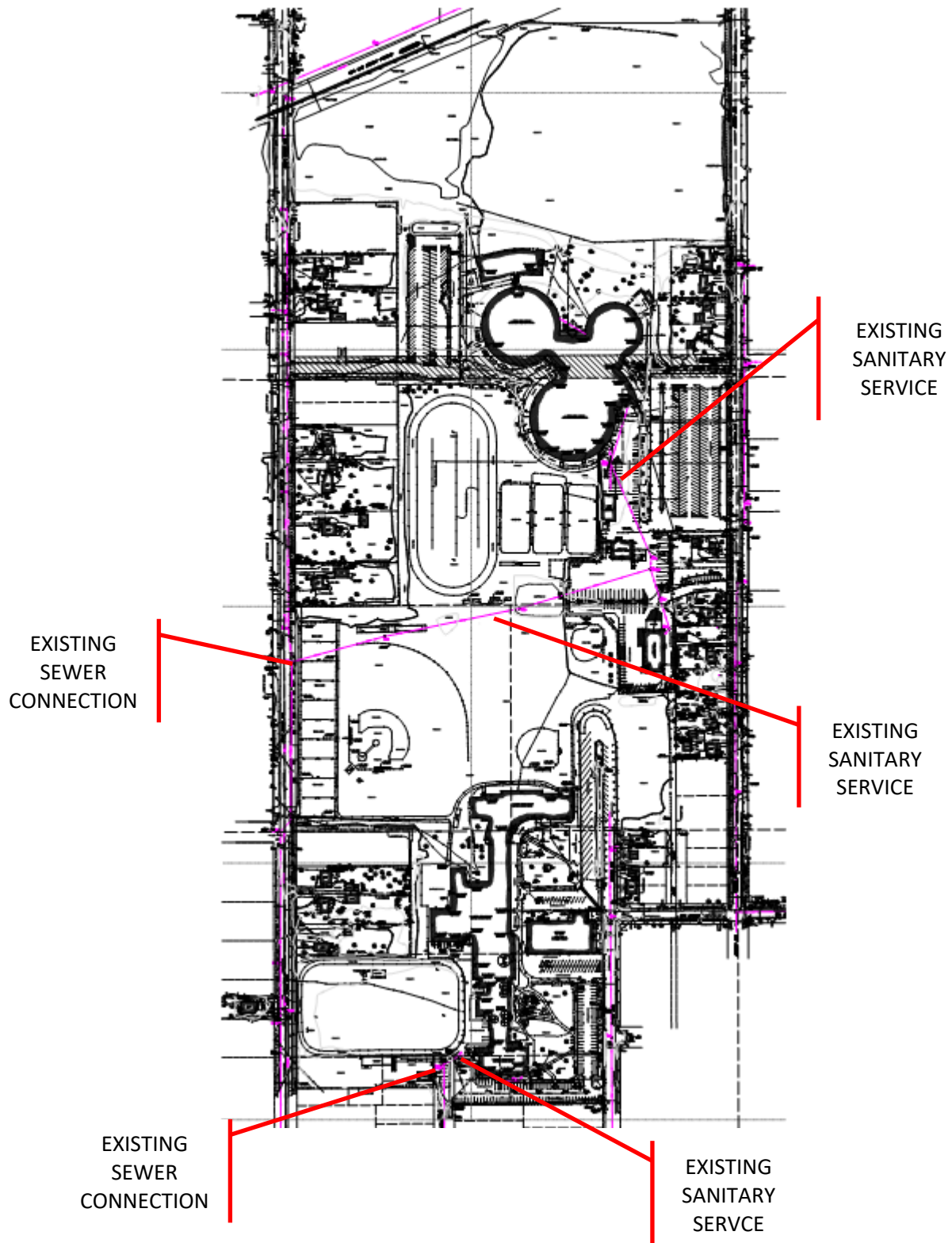
North High (Ccf)	2017	2018	2019
January (Oct-Dec)	439	387	394
April (Jan-Mar)	316	344	379
July (Apr-June)	371	421	309
October (July-Sep)	408	426	286
Total	1534	1578	1368
South High (Ccf)			
February (Nov-Jan)	649	693	760
May (Feb-Apr)	1069	1140	578
August (May-July)	957	485	616
November (Aug-Oct)	1584	756	760
Total	4259	3074	2714

* malfunctioning condenser in Nov 2017

Gallons			
	328,372	289,476	294,712
	236,368	257,312	283,492
	277,508	314,908	231,132
	305,184	318,648	213,928
Total	1,147,432	1,180,344	1,023,264
<i>Avg (365 days)</i>	<i>3144</i>	<i>3234</i>	<i>2803</i>
<i>Avg (220 days)</i>	<i>5216</i>	<i>5365</i>	<i>4651</i> (44 weeks * 5 days)
<i>Avg (170 days)</i>	<i>6750</i>	<i>6943</i>	<i>6019</i> (official school days)
	485,452	518,364	568,480
	799,612	852,720	432,344
	715,836	362,780	460,768
	1,184,832	565,488	568,480
Total	3,185,732	2,299,352	2,030,072
<i>Avg (365 days)</i>	<i>8728</i>	<i>6300</i>	<i>5562</i>
<i>Avg (220 days)</i>	<i>14481</i>	<i>10452</i>	<i>9228</i> (44 weeks * 5 days)
<i>Avg (170 days)</i>	<i>18740</i>	<i>13526</i>	<i>11942</i> (official school days)

White Bear High School Addition

Existing Sanitary Sewer Routing:



Proposed Sanitary Sewer Routing:

