

**CITY OF SAINT PAUL
RECORD OF DECISION REGARDING NEED FOR
ENVIRONMENTAL IMPACT STATEMENT
FOR IMPROVEMENTS TO LILYDALE REGIONAL PARK
PROPOSED UNDER THE
2010 LILYDALE REGIONAL PARK MASTER PLAN**

AUGUST 10, 2012

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I. ADMINISTRATIVE BACKGROUND

Lilydale Regional Park is owned and maintained by the City of Saint Paul. The Park consists of 384 acres, including the 100 acre Pickerel Lake and 100 acres of wetlands and marsh. Following the relocation of a portion of the Village of Lilydale from the Mississippi River floodway during the 1970's, the land now known as Lilydale Regional Park was obtained by the City through a land exchange agreement with Ramsey County. In addition to the numerous residential dwellings and outbuildings which comprised the Village of Lilydale, the Village was also home to industrial and commercial operations including a brick yard, an automobile salvage yard, a marina, and various dump sites. The impact of these past land uses are still apparent within boundaries of the Park.

In 1991, a "master plan" for Lilydale/Harriet Island Regional Park was prepared and adopted. In 2008, the Metropolitan Council prepared and published a park and trail survey. The Metropolitan Council's survey indicated that walking, hiking, picnicking, playground use and relaxing were among the top activities occurring in the Lilydale/Harriet Island Regional Park. During 2007 and 2008, a "community attitude and interest" survey was completed by the City to establish priorities for future improvements to the City's Parks and Recreation facilities. Likewise, the Metropolitan Council developed a Parks and Open Space Development Guide and Policy Plan which identified eleven elements for incorporation into regional parks and open space master plans. In order to meet the Metropolitan Council's criteria for parks and open space development, the City assembled a Lilydale Regional Park Design Advisory Task Force whose purpose was to advise in the development of amendments to the Lilydale Regional Park master plan. The Advisory Task Force held meetings and conducted a public forum to discuss amending the master plan. As a result, a Master Plan Amendment for Lilydale Regional Park was approved by the Design Advisory Task Force on July 1, 2009. The Master Plan Amendment was then approved by the Saint Paul Parks Commission on September 6, 2009. The Metropolitan Council adopted the Master Plan Amendment on January 13, 2010.

In moving forward with the goals and objectives of the 2010 Master Plan Amendment, the City would act as the project proposer. The City is thus the project proposer and the Responsible Governmental Unit ("RGU"). In light of the various parties interested in Lilydale Regional Park, the City determined to undertake a discretionary Environmental Assessment Worksheet ("EAW") pursuant to Minn. R. 4410.1000, Subpt. 3(D) to determine whether the 2010 Master Plan Amendments had potential for significant environmental effects to the Park.

In accordance with the Minnesota Environmental Quality Board ("EQB") rules, the discretionary EAW was filed with the EQB and circulated for review and comment to the EQB distribution list. A Notice of Availability was published in the EQB's *Monitor* on June 11, 2012. The EAW was made available for public review at the Saint Paul Public Library's Main Branch, Riverview Branch, West Side Citizen's Organization office, and on line at www.stpaul.gov/documentcenter/home/view/21138.

The EAW's comment period ran from June 11, 2012 through July 11, 2012. All comments received were considered in determining the potential for significant environmental effects as a result of undertaking the proposals contained in the Master Plan Amendment. During the

EAW's comment period, thirty-two comments were received via letters or oral comment received during a public meeting conducted on June 18, 2012. The comments and the City's responses to the comments are included in Appendix A to this Record of Decision.

Based upon the information in the records, which are comprised of the EAW for the proposed project, the issues raised during the public comment period, and the responses to those comments, and other supporting documentation, the City of Saint Paul, as the RGU for this project proposal, makes the following findings and conclusions:

II. PROJECT DESCRIPTION

The 2010 Lilydale Regional Park Master Plan Amendment is intended to restore the natural resources of the Park including the removal or remediation of contaminated soils and debris left over from previous land uses associated with occupancy of the Park by portions of the Village of Lilydale and to restore areas in the Park with natural park communities. Specifically, the goals and objectives stated under the Parks' Master Plan Amendment include: provide a central gathering location within the park; develop a trail system hierarchy within the park; minimize the impact to restored landscapes by preserving large tracts of land for natural habitat; remove invasive plant material and restore natural plant communities; provide storm water treatment and enhance water quality within the Park including Pickerel Lake; provide wildlife observation areas, improve connectivity with the park's existing fossil grounds; provide a park entrance gateway; improve safety and security within the park; and strengthen the park's connection to the Mississippi River.

The goals and objectives in the 2010 Lilydale Regional Park Master Plan Amendment will be implemented in stages should project funding become available. Because of the interest in the park, the City of Saint Paul determined to undertake a discretionary EAW to determine whether implementation of the Amended Master Plan may have potential for significant environmental effects.

III. DECISION REGARDING THE NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT

Based upon the following criteria an Environmental Impact Statement is not necessary for the proposed project:

A. Type, Extent, and Reversibility of Impacts

The EAW considered and adequately described the type, extent, and reversibility of impacts anticipated to result from the proposed project on the natural and built environment of the Park. Specifically, the EAW discusses several specific mitigation measures that will minimize identified project impacts associated with the natural environment as well as fish, wildlife, and ecologically sensitive areas.

Comments were received from other governmental units, private citizens, and citizen groups regarding the environmental impacts of the proposed project on a variety of matters including

wetlands, water quality, floodway and flood fringe zoning, land use and previously contaminated waste sites, protected species and regionally significant ecological areas and archaeological sites.

The comments and the responses to the comments are attached hereto as Appendix A. The responses to the comments note: that a Technical Evaluation Panel will evaluate the project for permit approvals required under the Wetlands Conservation Act, that a Minnesota Department of Natural Resources Public Waters Work Permit will be completed for wetland impacts below ordinary high water level, that measures properly manage storm water runoff are identified in the EAW, that permits for water connections, sanitary service, and stormwater management are required from various State Agencies and that the regulatory requirements of the Agencies permits will be followed, that land-use on the Marina Demolition Dump Site and the Lilydale Park Dump site are to be reviewed for approval under the Pollution Control Agency's VIC program, that the EAW notes that specific design considerations will be implemented to mitigate project impacts on fish and wildlife, that the EAW notes that an archaeology survey may be required by the State Historic Preservation Office and that the various requirements and permit conditions imposed on the project through the mitigation measures noted under the EAW, or imposed as permit conditions and in the responses to comments demonstrate that the project does not have the potential for significant environmental effects.

B. Cumulative Potential Effects of Related or Anticipated Future Projects

As discussed under the EAW, no cumulative potential effects, whether direct or indirect, related or anticipated future development, have been identified for the proposed project.

Comments were received from other governmental units, private citizens, and citizen groups regarding the cumulative potential effects of related or anticipated future projects including how this project impacts Lilydale Regional Park or other City parks located along the Mississippi River and Valley. The comments and responses to the comments are attached hereto as Appendix A. The responses to the comments note: that the EAW adequately addressed the cumulative impact of the project on related or anticipated projects for City parks and that the EAW adequately addressed the cumulative impact of the project on groundwater, stormwater, wetlands and loss of sensitive resources.

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

The EAW found that the project does not have potential for significant environmental effects resulting from the project. The EAW notes that identified environmental impacts will be mitigated through design features that will be implemented in accordance with and coordinated through various State and Federal agencies with permitting authority. Those aspects of the project subject to agency permit review will not proceed until permits are issued. The regulatory requirements of permits will be on-going. The required permits for the project, the agencies responsible for issuing permits, and the status of the permits are attached hereto as Table 1.

Comments were received from other governmental units, private citizens, and citizen groups regarding permits and the permitting process. The comments and responses to the comments are

attached hereto as Appendix A. The responses to the comments note: that the project will be undertaken in full compliance with the regulatory permitting process. As the ongoing operator of Lilydale Regional Park, the City will comply with regulatory requirements.

D. Extent to Which Environmental Effects Can Be Anticipated and Controlled as a Result of Other Environmental Studies

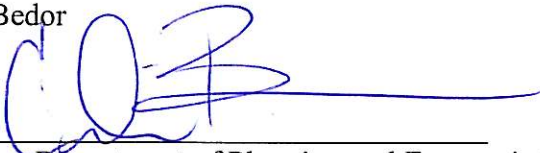
The EAW found that no additional environmental impacts were anticipated from the project. It is intended that the proposed project will restore the presently environmentally degraded condition of the park to a natural resource based park.

Comments were received from other governmental units, private citizens, and citizen groups regarding anticipated environmental effects including the need for an environmental impact statement. The comments and responses to the comments are attached hereto as Appendix A. The responses to the comments note: that various on-going regulatory requirements will control adverse environmental impacts and that the environmental effects reasonably expected to occur as a result of the project can be anticipated and controlled or mitigated as the case may be.

IV. CONCLUSIONS

1. All requirements for environmental review of the project have been met.
2. The EAW process for the project has generated information that is adequate to determine whether the project has potential for significant environmental effects.
3. Areas where potential environmental affects have been identified will be addressed during the detailed permit review processes for the project. Mitigation of environmental effects will be provided where impacts are expected to result from project construction operation. Mitigative measures are incorporated into the project design and have been or will be coordinated with the appropriate reviewing agency during the permitting process.
4. Based on the criteria under Minnesota R. Subpt. 4410.1700, the proposed project does not have the potential for significant environmental effects.
5. The EAW and the responses to comments received from the EAW for the proposed improvements pursuant to the 2010 Lilydale Regional Park Master Plan Amendment are adequate and an Environmental Impact Statement is not required for the project.

Cecil Bedor



Director, Department of Planning and Economic Development
City of Saint Paul

Date: 8/10/12

TABLE 1

PERMITS AND APPROVALS

Table 8.1 Permits Received for Environmental Clean-Up

Unit of Government	Type of Application	Status
City of Lilydale	Conditional Use Permit	Completed 05/10/2010
City of Saint Paul	Conditional Use Permit	Completed 08/27/2010
MPCA	Environmental Clean-Up (NPDES)	Completed 10/12/2010

Table 8.2 Agency Review for Environmental Clean-Up

Unit of Government	Type of Application	Status
MnDNR	No Rise Certificate	To Be Submitted August 2012
MPCA	VIC Enrollment	Submitted 04/13/2012
City of Saint Paul	Site Plan Review	Completed 09/01/2010

Table 8.3 Permits Pending for Roadway Work

Unit of Government	Type of Application	Status
City of Saint Paul	Conditional Use Permit	Submitted June 28, 2012
City of Saint Paul	Mn Wetland Conservation Act (WCA)	Submitted May 29, 2012 – supplemental wetlands to be included September 2012
MnDNR NHIS	Review	Received 05/15/2012
State Historic Preservation Office (SHPO)	Review	Review after Determination from Army Corps of Engineers Regarding Mn WCA
MnDNR	Public Waters Work Permit	To Be Submitted September 2012

Table 8.4 Other Anticipated Agency Review for Roadway Work

Unit of Government	Type of Application	Status
Lower Mississippi Watershed Management Organization (LMWMO)	Review	
City of Saint Paul	Site Plan Review	Submitted May 25, 2012
City of Saint Paul	Work within the Right-of-Way	Right-of-Way Needs To Be Defined
City of Lilydale	Review	
MPCA	VIC Review	
US Fish and Wildlife Service (USFW)	Review of Bald Eagle Nest	
Met Council Environmental Services (MCES)	Sanitary Sewer Extension Permit-Review	To Be Submitted Near Time of Construction (May require 2 weeks of lead time)
MPCA	Sanitary Sewer Extension Permit	To Be Submitted Near Time of Construction (May require 2 weeks of lead time)
Minnesota Department of Health (MDH)	Plan Review for Water mains	To Be Submitted Near Time of Construction (May require 2 weeks of lead time)
MPCA	General Stormwater Permits for Construction Activity (NPDES)	To Be Submitted Near Time of Construction (May require 30 days of lead time)
Union Pacific Railroad	Review and Coordination	Railroad contacted week of May 21, 2012. Currently researching determination of roadway and railroad easements to determine which was in place first prior to discussion with Railroad.
Xcel Energy	Review and Coordination	Design for burial of existing electrical lines is currently underway. Further information for gas lines is needed.
Centurylink	Review and Coordination	

APPENDIX A
COMMENTS RECEIVED AND RESPONSES

Lilydale EAW: Comments & Response to Comments

Amy Goetzman	
Comment 1:	This is a very unique and fragile part of the Twin Cities, and I urge the city to make a thorough environmental assessment before making any changes that could hurt wildlife and damage water quality. We live in a noisy and overcrowded urban environment, and Lilydale is a little escape from all that. My children and I enjoyed fossil hunting there a couple weeks ago, and we loved the way it feels almost like you've escaped the city; its wild and undeveloped nature adds to its appeal. So many aspects of this development plan seem to pave and erase too much of the park. Most disturbing is the plan to open Pickerel Lake to motors. We have seen several species of rare birds there, and it is ideal (and without motorboats, safer and more family-friendly) for canoeing and kayaking. But it is a shallow lake, and adding motors will disturb the shoreline, and open the waters to pollution and invasive species. We already have plenty of places for cars and motor boats. We've paved just about everything in this hot metro area. Can't we keep one little place just a little wild?
Response 1:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended. Section 11 describes the ecological resources; no potential for significant impacts from the proposed project have been uncovered. While Lilydale Regional Park may appear to be natural, its former uses including the brick factory, housing and both permitted and unpermitted dumping have left significant impacts on the land. Many of the species that have grown over these former uses are aggressive and non-native species which are not as beneficial to wildlife and habitat as this land could potentially be. The City's intent is to enhance the park's "natural" aesthetic through the remediation of contaminated areas, management of invasive species, provision of educational programming and interpretive signs which in combination will help to enhance Lilydale Regional Park. Natural resources within the park including the bluffs, lake and wetlands will continue to be enhanced and protected as funding is secured. Section 11.4 of the EAW addresses the concerns about birds and nesting sites.

Anna and Matt Botz	
Comment 1:	We'd like to express some serious concerns regarding the environmental impact the Master plan may have on Lilydale Regional park. We feel that the EAW that was conducted has raised more questions than it has answered. We're concerned about the roads being widened and trees being removed in this narrow area of land. If the road is widened, we can expect to see an increase in traffic to this sensitive area. With increased traffic, there will be more animal casualties than with the current road. We're wondering exactly how many habitats can be destroyed and still have survival of their species? We're concerned about buildings or pavilions being constructed on top of old landfill that is potentially still off-gassing. Another concern is the constructing of plumbing or sewage being run in an area that is on a flood plain. Also, being so near to the river, is the issue of crowding out or obliterating current wildlife in this area. Only an Environmental Impact Statement could attempt to answer some of these questions. By conducting an EIS, perhaps we can get a clearer picture of what the outcome may be. Our family enjoys the park year round. It is truly a unique gem in the heart of the city. There are already plenty of highly manicured parks (including nearby Harriet Island) for recreational enjoyment, but what Lilydale has to offer is very beautiful and natural.
Response 1:	No EAW was required but the City voluntarily conducted a discretionary EAW. The purpose of an EAW is to aid in the determination of whether an EIS is needed for a proposed project due to the potential for significant environmental impacts resulting from the Project. The proposed project has been evaluated under the process, and no significant adverse effects were identified. For supporting documentation in the EAW please see Section 11 for habitat and sensitive species, Section 20 for contaminated waste, and Section 21 for traffic. The project description, Section 6, reviews the layout of the project and contaminated areas clean up. The

Anna and Matt Botz

EAW is not a means to approve or disapprove a project. Rules for the issuance of permits, including the opportunity for public comment, are a method for managing environmental impact. Lilydale has many natural and cultural amenities which make it a special place. Yet, while Lilydale Regional Park may appear to be natural, its former uses including the brick factory, housing and both permitted and unpermitted dumping have left significant impacts on the land. Many of the species that have grown over these former uses are aggressive and non-native species which are not as beneficial to wildlife and habitat as this land could potentially be. The City's goal is to emphasize the park's "natural" aesthetic through the remediation of contaminated areas, management of invasive species, provision of educational programming and interpretive signs which in combination will enhance Lilydale Regional Park. Natural resources within the park including the bluffs, lake and wetlands will continue to be protected and enhanced as funding is secured.

Bob Spaulding - river planner for Friends of the Mississippi

Comment 1: And I'm here today representing as River Planner for Friends of the Mississippi River where 15, 17-year-old non-profit organization representing the Mississippi River Communities throughout the Twin Cities and looking out for the ecology and recreational values and cultural values of the Mississippi River corridor. I want to thank Parks and others for making this EAW session possible. While it was -- and I serve, I should mention, as co-chair of the Lilydale Advisory Task Force. While in that context, we saw additional detail that I wasn't entirely familiar with. Nothing in the EAW uncovered anything that we were not already generally familiar with. In order to provide -- I have a few comments that arise from this, and a lot of these deal with transportation. In order to provide the safest possible transportation improvements, a few things that rise to the top from the EAW. These echo, I note, a proposal put out by the Friends of Lilydale. Many people from Lilydale have already supported these. One is that there should be where possible, separated paved bike trails and pedestrian trails through the park. Not all areas would allow for this, but there are many areas that would allow better passage to the park. Friends of Lilydale or members of the Friends of Lilydale signed on in support this. There's been minimal -- minimal storm water impacts from that given there's not a storm sewer service involved. Another is trail alignments and crossings. There have been issues brought up about trail alignments through the park, and wanting to get a little more firmness and detail on that. It seems reasonable and I hope and expected that that would be something that would come about reasonably soon in any case. But that would be good to see and make sure that the crossings are safe given the volume of traffic we expect to see on the street. That might be meaningful in line with intersections and the like. Further investigation is needed along those lines. Finally, one thing that's detailed, that the EAW highlighted, that needs further refinement I think, we think as Friends of the Mississippi River, is the four-foot trail along Lilydale Road. There's long been plans for a trail of some sort along Lilydale Road, primarily intended for bicycles on the shoulder of the road. Four feet is a little small. MnDOT's typical standard for a trail is six feet, not to say that's true everywhere in St. Paul. In this context, we think something more than four feet with the gravel shoulder and ten-foot narrow drive lanes, as well as the median in place, warrants something wider than a four-foot shoulder. Those are our comments and I appreciate the chance to speak.

Response 1: Your comments on trail layout and design alternatives are noted. The City has weighed these and other considerations in arriving at the design being proposed at this time. The EAW is intended to address design or layout alternatives in the context of potentially significant environmental effects.

Carol Neumann

Comment 1: The possibility of motorized boating on Pickerel Lake should be eliminated from section 11.5. There is absolutely no need for entertaining such an idea. Who came up with that???? I am certain

Carol Neumann	
	it is no one who uses the park regularly, nor those who live in the area of the West Side.
Response 1:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended.
Comment 2:	Impervious surfaces leach into the ground water, and in this case (flooding, etc.), ground water should not be more polluted, but rather less polluted. Is there not a way to minimize the problematic surface materials used for this project? Why would the parking lot by Pickerel Lake be changed from crushed rock to a tar-like substance? And why will it be enlarged? It is never even close to full capacity when in use.
Response 2:	Stormwater management will be reviewed in the NPDES permit application. Treatment and infiltration is proposed before storm water enters Pickerel Lake or the Mississippi River. The available detailed design was reviewed for the EAW. Permits cannot be issued without full compliance with runoff treatment measures which are being refined for permit applications. Despite the perception that gravel is pervious, the material used in the current Pickerel Lake parking lot and the lakeside trail was not designed to facilitate infiltration. Additionally, an increase in impervious cover does not equate to an increase in volume or rate of runoff into nearby waters; topography, vegetation and soil types are all factors in the net increase/decrease of runoff. Pervious paving systems were explored, but ruled out in the floodway due the deposit of materials during and after flooding which negate the pervious properties. The proposed parking lot will be the same size as existing lot at 25 stalls. Sections 17-19 of the EAW provide additional information on water quality.
Comment 3:	Additional roadway should not be built unless it is clearly identified as a roadway that bikes must share. Currently, packs of bikers take over the roadway. I do understand it is a beautiful area to ride in, but either bikers should have their own pathway, or move when automobiles are coming through. This does not happen now, and without a plan to make it happen, it will not happen in the future. What is the plan to have bikers share the roadway?
Response 3:	Not an environmental impact. As described in Section 6 of the EAW, the design includes bike shoulders specifically for cyclists. The major circulation conflicts in the park occur at the pinch points of the historic bridge and the railroad bridge. Both of these would be mitigated through the full build out of the park's master plan. Currently the City is working with the railroad to determine the most fiscally, and physically feasible place to allow for an underpass for the trail.
Comment 4:	As for light pollution, the amount of city light is excessive, as things stand today. Additional lighting in this wonderfully remote area would be a tragedy. Please reconsider the lighting, and minimize it. There are few lights now, and that does not make it unsafe or scary. Our cars have headlights. Frankly, that is all we need to see safely. Fireflies do not rally into lit areas, and Lilydale Park is a great habitat for them. Do we need to lose them by providing more lights?
Response 4:	Lighting will be limited to trail/road intersections, parking areas and the shelter and restroom for safety. Specific lighting styles/fixtures will be selected to minimize light pollution.
Comment 5:	Lilydale Regional Park is an oasis on the south side of the Mississippi River, and which there is no equal to in the City of St. Paul. The plan to "update" the park is really just shorthand for pave and build. Although some change is good, the proposal of so much impervious surface being installed would make the area greatly changed. When the community that surrounds the area is involved in the change, and encouraged to participate, it makes a huge difference. But when the community solicited ideas are dismissed or discarded, and it is decided to take the community input, suggestions, and dreams for the park area, and toss them away, we need to ask ourselves who are the real guardians of this wonderfully wild piece of land? Truly, it is not only the park department who is in charge. It is also each and every one of us who almost daily uses this park, and has memorable experiences of what so many of us regard as our little piece of paradise. Three of my concerns are: Far too many impervious surfaces are being added; and there should not even be a consideration of motorized boating (section 11.5 Fish) on Pickerel Lake; and

Carol Neumann	
	Lilydale Park should not have light pollution.
Response 5:	Lighting will be limited to trail/road intersections, parking areas and the shelter and restroom for safety. Specific lighting will be selected to minimize light pollution. Section 17 of the EAW addresses water quality and runoff. The impervious surface is being addressed through the NPDES permit process, and you are encouraged to keep in contact with the city about design alternatives to reduce this and the subsequent storage and treatment requirements. Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended. Please feel free to review the documents on the City's website for Lilydale Regional Park to get an idea of the community process that took place over several years with input from many individuals and representatives of various organizations and departments. Lilydale has many natural and cultural amenities which make it a special place. Yet, while Lilydale Regional Park may appear to be natural, its former uses including the brick factory, housing and both permitted and unpermitted dumping have left significant impacts on the land. Many of the species that have grown over these former uses are aggressive and non-native species which are not as beneficial to wildlife and habitat as this land could potentially be. The City's goal is to emphasize the park's "natural" aesthetic through the remediation of contaminated areas, management of invasive species, provision of educational programming and interpretive signs which in combination will enhance Lilydale Regional Park. Natural resources within the park including the bluffs, lake and wetlands will continue to be protected and enhanced as funding is secured.
Comment 6:	I also believe an EIS should be done, so that any and all remediation is addressed for those areas that are polluted, whether they are dump sites, or any other kind of ground and/or water pollution. I would like to believe that proper clean-up will be done, but with an EIS, I feel much stronger that would be accomplished. Thank you for taking the time to read this. It is written from my heart, and with a great deal of love for my favorite park.
Response 6:	Section 6.8 and 9.2 discuss removal of contamination. Section 8 summarizes received and pending permits from the Minnesota Pollution Control Agency (MPCA). Section 9 reviews potential environmental hazards and studies to date. Section 20 summarizes hazardous waste studies. The MPCA did not have additional comments on the EAW. Dakota County commented to continue following the clean-up in accordance with the Response Action Plan, and that the county has additional staff to provide advice. The proposed project has been evaluated in accordance with laws of the State of Minnesota for environmental review. Potential for significant adverse effects were not identified for any environmental issues. The EAW is intended to determine whether an EIS is required on a project. It is not a means to approve or disapprove a project.

Carol Swenson	
Comment 1:	Would like to receive copy of responses.
Response 1:	Comment noted.

Christine Soutter	
Comment 1:	Effects of Overdevelopment on Park's Natural Resources - Prime uses for Lilydale include hiking, biking, birding, photographing, fishing, snowshoeing, and skiing. How would these "silent sports" be affected?
Response 1:	Current uses will remain main the focus of Lilydale Regional Park. Planned improvements will make the park more accessible to the public, and design measures have been implemented to reduce traffic conflicts through the park, enhance trail systems, and enhance the habitat by environmental remediation and management practices to encourage growth of native vegetation.

Christine Soutter	
Comment 2:	Effects of Overdevelopment on Park's Natural Resources. Lilydale is a place to go to enjoy the calming effects of the natural world. How would development affect the natural experience that draws people to the park?
Response 2:	As an outcome of the Master Plan, Pickerel Lake will become the main focus of Lilydale Regional Park, offering vistas of the adjacent river bluff. Measures have been taken to minimize impacts to the surrounding floodplain forest and wetland, and previously disturbed areas are proposed for natural vegetation restoration, including some prairie openings. Enhancements to the park will continue to focus on the uniqueness of Lilydale Regional Park and educational programs there will help to foster stewardship of our natural environment for future generations.
Comment 3:	I believe the development of Lilydale Regional Park should build on the strength of the park – highlighting its plant and animal life, fossil and water resources. Unlike Cherokee and Harriet Island Regional Parks which are very landscaped, have vista views and draw crowds, Lilydale should continue to offer a quiet, immersion experience in the natural world.
Response 3:	This comment does not relate directly to the EAW process. The City agrees that enhancements to Lilydale Regional Park should be focused on the natural and cultural amenities unique to the park. The Master Plan outlines the improvements to be made to the park .which were gathered through a community process. This plan has been approved by Metropolitan Council. The City intends to engage the community in further development of the concepts within the master plan as funding becomes available for the various components.
Comment 4:	Dog Park Next to River - How will activity and barking be kept from disturbing wildlife, especially nesting birds?
Response 4:	The City will continue to evaluate planned uses of the park, including a dog park, and consider this as part of long term management. The purpose of an EAW is to determine whether an EIS is required. The proposed project, including the dog park, has been evaluated in accordance with laws of the State of Minnesota for environmental review. Significant adverse effects were not identified for any environmental issues.
Comment 5:	Overuse of Park - Drawing large groups of people at a time will change the nature of the experience of the park and stress the park's natural resources. How will this be addressed?
Response 5:	The City will continue to evaluate planned uses of the park and consider use rates as part of long term management.
Comment 6:	Scientific Value of Park - How will the long-term Monarch Monitoring program done in conjunction with the University of Minnesota be affected?
Response 6:	Minimal impact to the existing monarch monitoring site facilitated with the U of M is anticipated as road and trail construction in that area are not proposed at this time. Section 6 of the EAW describes the layout of roads and trails.
Comment 7:	I wonder if long-term plans for Lilydale Regional Park also address restoration of the bluff prairie and controlling erosion on the bluff trails and in the fossil beds.
Response 7:	Bluff stabilization and habitat restoration are important components of both the Lilydale Regional Park Master Plan Amendment dated 2010 and in the Great River Passage Master Plan. Erosion and sediment control are addressed in section 16.
Comment 8:	Additional Impervious Surfaces - How will runoff from roads and parking lots be treated to reduce the impact of rushing storm water, road salt, and on Pickerel Lake and Mississippi River?
Response 8:	Section 17 of the EAW addresses water quality. Despite the perception that gravel is pervious, the material used in the Pickerel Lake parking lot and the lakeside trail was not designed to facilitate infiltration. Stormwater management will be reviewed in the NPDES permit application, treatment and infiltration is proposed before it enters Pickerel Lake or the Mississippi River. The

Christine Soutter	
	available detailed design was reviewed for the EAW. Permits cannot be issued without full compliance with runoff treatment measures which are being refined for permit applications.
Comment 9:	Dog Park Next to River - How will urine and feces be kept from washing directly into river in a storm?
Response 9:	This potential impact of domestic animal waste will be addressed in the design of the future dog park. The City will continue to evaluate all planned uses of the park and consider this as part of long term management.
Comment 10:	Stability of Voids in the Dumpsite - Will structures on Pickerel Clearing be compromised as the old dump site continues to decompose?
Response 10:	Section 6 of the EAW describes the project features and contaminant clean up and permitting. The construction of the shelter and restroom facilities will occur in a later phase once the capping material has had a chance to provide some surcharging benefits to the mound. In addition, use of helical piers or an alternative structural footing system in the construction will provide stability to the structures that standard footings would not provide.
Comment 11:	Effects of Overdevelopment on Park's Natural Resources - Lilydale is an excellent area to enjoy birds. How intrusive would development of the open space be on wildlife?
Response 11:	Section 11.4 of the EAW details the bird species known to nest in Lilydale Regional Park and identifies the most significant potential impact to avian habitat from construction activities such as tree clearing. Tree clearing and removal must be carefully monitored to avoid such disruption. Section 11 also addresses the impact on other wildlife.
Comment 12:	I urge you to require a full Environmental Impact Statement be done on development plans for Lilydale Regional Park. It is important not only to examine the impacts during construction, but also the long-term impacts of the proposed development. I have many concerns regarding Lilydale Regional Park that are not adequately addressed by the Environmental Assessment Worksheet. In view of the number and variety of concerns regarding development of Lilydale Regional Park, please have a full Environmental Impact Statement done.
Response 12:	An EAW is intended to help determine for the public and units of government the environmental impacts of the proposed project and whether an EIS is needed. The EAW for the proposed project evaluated the potential for significant environmental effect and did not identify a need for further study.
Comment 13:	I am also concerned about using tax money to duplicate facilities that are offered in adjacent regional parks. Cherokee and Harriet Island Parks already provide large parking lots, open fields, picnic tables and other structures for large groups. A dog park will be available across the river.
Response 13:	Not an environmental impact. Lilydale Regional Park is bound by the Mississippi River to the west, river bluffs to the east and Interstate 35E to the south. These elements create boundaries around the park that do not make access to surrounding regional parks as accessible as they would appear from a Birdseye view. Cherokee Regional Park and Harriet Island Regional Park have separate master plans that their facilities support and these are not considered duplicate facilities. The parking is not intended to serve other parks, only local users in Lilydale Regional Park. The City has recently conducted a Systems Plan which looks comprehensively at all of the City's Parks and the stratification of uses to ensure that we have a plan to provide a range of opportunities and services to all residents. In addition, the Great River Passage Master Plan provides recommendations for all of the parks along the 17 miles of Mississippi River based on existing resources in each park and the appropriate uses ecologically, socially and recreationally.

Drake Dot	
Comment 1:	<p>There are numerous parks throughout the city and surrounding areas with pavilions, playgrounds, pools, double-lane paved roads, huge parking lots and more. Lilydale is special. It is quiet. Quiet enough for the wildlife that inhabits it to evidently feel safe there. And they are safe there. Lilydale is special to hikers, bikers, runners and those of us just enjoying the peace and beauty of it. There is nothing quite like walking down an unpaved path -- the kind you remember from childhood. I enjoy showing Lilydale to out-of-town visitors. They are impressed that the city is wise enough to value a truly unique place like this.</p> <p>Leaving it the way it is also ensures that children can fish there, and wildlife roam there, with no cars speeding on an 'improved' road. What's to 'improve' about a leisurely drive through a quiet, picturesque, secluded area on a road that impels you to take your time and enjoy the scenery, and the lovely plaque in memory of a little boy?</p>
Response 1:	<p>Lilydale Regional Park may appear to be natural; its former uses including the brick factory, housing and both permitted and unpermitted dumping have left significant impacts on the land. Many of the species that have grown over these former uses are aggressive and non-native species which are not as beneficial to wildlife and habitat as this land could potentially be. The City's goal is to emphasize the park's "natural" aesthetic through the remediation of contaminated areas, management of invasive species, provision of educational programming and interpretive signs which in combination will enhance Lilydale Regional Park. Natural resources within the park including the bluffs, lake and wetlands will continue to be protected and enhanced as funding is secured.</p>

Frank Emanuelson	
Comment 1:	<p>I have heard some conflicting issues on the number of picnic areas. I was under the impression that the original design was for one shelter by the new parking. I have heard that there is now some talk of an additional shelter and more parking. While I lean towards keeping the park natural, I understand how a shelter as in the plans revealed awhile back could be beneficial, esp. for class trips, hikers with physical challenges etc. If there really is discussion for more adding additional shelter/picnic area, I would have some concerns, due to the size and nature of the park. Also, I have heard there are some concerns of the soil for where the shelter is planned. I would hope that sufficient studies and testing is done to make sure building over this soil will not cause in the near or distant future.</p>
Response 1:	<p>Section 6 of the EAW describes the project. The construction of the picnic shelters and restroom facilities will be phased with one shelter and the restroom going in an earlier phase. An additional shelter adjacent to Pickerel Lake could be added in the future if needed, however, this would not occur without prior public input. The information in the Environmental Assessment Worksheet (EAW) reflects a full build- out of the concept described in the 2010 Master Plan Amendment and the subsequent design development for the roadway, restroom and shelter designs as well as the plan for a continual trail through the park. This includes up to 2 shelters and a restroom facility in the open area by Pickerel Lake, referred to as "Pickerel Clearing". The size of shelters for Pickerel Clearing included in the EAW included a 6-table shelter (24'x48') and 2- table shelter (18'x32') and a 2- toilet restroom/storage building (31'x41') all with green roofs. All soil testing has been and will continue to be in accordance with the Minnesota Pollution Control Agency and all other agencies that have pertinent policies and regulations. Soils under structures will be well documented and engineering solutions such as surcharging, incorporation of helical piers and pilings instead of footings will be utilized in areas of unstable soil.</p>

Frank Emanuelson	
Comment 2:	I know there were a few public comments in regarding misgivings of widening the road bringing in more traffic. While I lean more towards keeping the park more natural than developed, the traffic is already there. There are a couple of places where the bike/ walking trail disappear (one is near the old rail road trestle - fossil yard entrance) and you end up on the road at a particularly curving portion of the road where both the pedestrian and the driver would be in a blind spot. I am a little nervous walking or running in these areas as an adult, so I am concerned with the number of little kids biking the trails on family outings. I do think one of the top priorities is fixing the trail and road at these points. I think this is a safety concern regardless of how much or how little development is done in the park.
Response 2:	Not an environmental impact. The City will work to ensure safe trail layout.

Gjerry Berquist	
Comment 1:	Why is there so much resistance to vacating the roadway to prevent excessive vehicular traffic during week day rush hours, or closing the roadway except for certain events? Reducing the numbers of through traffic in this area would also help to reduce the potential for vehicular-pedestrian-cyclist conflicts. Another benefit would be to more easily monitor traffic in this area to prevent unauthorized trash disposal and other behaviors deemed inappropriate by Parks and the immediate neighborhood. As proposed, there will be no way to determine if someone is in the Park when it is closed or just passing through
Response 1:	Not an environmental impact from the Project. The Department of Parks& Recreation has been in conversation with the Saint Paul Police Department who maintain that the road should remain open from a safety point of view. In addition, it is necessary that we continue to provide the current level of access to the DNR boat launch and to the Pool and Yacht Club. The current design does not preclude Public Works from closing the road if that becomes necessary over time.
Comment 2:	And finally, I am very concerned about the comment about providing lighting on the roadways and other areas for "security" sake. Providing illumination of this Park serves no purpose other than wasting valuable electric production and polluting our few areas in the neighborhood that have dark skies. The wildlife does not need the light at night and I would seriously question as to whether the people utilizing the park after dark, and after Park hours, need light as well.
Response 2:	Lighting will be limited to trail/road intersections, parking areas and the shelter and restroom. Specific lighting will be selected to minimize light pollution.
Comment 3:	There appears to be lacking any reference to the problem that has plagued this area for years, i.e.: illegal trash dumping. Guard rails are located on both sides of every road in this area and have prevented most of the illegal dumping for years. Yet there is no mention of this issue in the roadway/trail configurations. If the guard rails are to be replaced, how will they impact the overall appearance and feeling of the Park?
Response 3:	Not an environmental impact from the Project. Although guard rails are not required per MNDOT or ASHTO regulations and standards, they will be used strategically to provide cues for circulation. The grade adjacent to the road as well as strategically placed guard rails will deter illegal dumping. Maintenance and Operations will monitor the activity and the City is committed to putting up additional guard rail if dumping becomes an issue.
Comment 4:	The locations of the roadways and trails encourage many opinions. I would like to see as much bike/walk trail available to provide view and access to the River which includes the trail between the proposed Bark Park and River. I understand the city has property at the site of the Omaha Railroad swing bridge that could permit the trail to be practically on the shore of the River. This trail would provide another opportunity to the River and help reduce the expense that is considered for widening the roadway under the train tracks or creating another tunnel for the

Gjerry Berquist	
	trail. (Anything to reduce the vehicular-pedestrian-cyclist conflicts is money well spent.)
Response 4:	Future trails are shown on Figure 6.3 of the EAW. The city agrees that views and access to the river are important and will continue to be explored as future planning occurs. Current plans for the roadway and trails are based on many factors which include the varied experiences available within Lilydale Regional Park.
Comment 5:	Attached is page 2 of the Lilydale Regional Park Natural Resources Management Plan dated 31 May 2009 created by a local natural resources engineering firm called Bonestroo. The natural resources inventory and report was funded at considerable expense by the city. The report started with the statement that, "Overall, protecting and monitoring the water quality of Pickerel Lake is a top priority...." I understand that Parks has received funding for another "study" concerning water quality to the Lake. I have also noticed areas place on a map to indicate future treatment areas. However, these steps, although in the right direction, are not adequate to address the top priority concerning the destruction of Pickerel Lake by the excessive amounts of phosphorus from Mendota Heights. Parks is aware of the problem and knows the long term consequences. There does not seem to be the desire by Parks to provide immediate and corrective solutions. I believe this is seriously short sighted and needs to be addressed as soon as possible.
Response 5:	Not an environmental impact from the Project. . As noted in Section 6.10 of the EAW, the City states a commitment to seeking ongoing funding for elements identified in the Master Plan which includes treatment of Ivy Falls. The City is aware of the threat to Pickerel Lake from Ivy Falls and the staff has expressed the concerns to Dakota County and the Lower Mississippi Watershed Organization. Unfortunately, the main source of pollution into Pickerel Lake is outside City of Saint Paul limits and Ramsey County; therefore the City is limited in their ability to provide enforcement outside of their jurisdiction. The City will continue to explore funding opportunities to address Ivy Falls.

Grit Youngquist	
Comment 1:	I, too, would like to speak in favor of a full EIS statement being implemented. I was trying to wrap my brain around the EAW process and the report and really had a hard time, I guess, understanding what I read to see that it gave a full -- a full assessment and something that started from a neutral place. I didn't see that. I saw that the neutrality seemed to be missing and a lot of effort went into the report to -- it seemed to me in writing it, to work hard to justify park staff plans for a new road, parking lots, and buildings, and how they fit into a natural resources based park. The report really does not address why intrusive elements are needed and justified in a park of this nature or in Lilydale Park. And it doesn't seem to thoroughly assess and address many other potential critical environmental issues, which I will submit in writing. One of the things that I looked for in the report and didn't see was something about public demand for more parking lots, buildings, new vista, Pickerel Lake, views of the river along Water Street, trees as the EAW implies and describes. No indication of traffic studies indicating need for new road, for alignment. And the curious decision to ironically start with improvements in part of the road, the middle part where there is the least impact by chronic erosion and also public safety concerns. The report doesn't appear to address how the plan fits within the Mississippi River Critical Area Plan or program. I perhaps missed that, but did try to look for it, and wondered how the DNR and MNRRA (ph.) will be involved in officially reviewing the report and the plan and what impact new rulemaking plans may have on the developments in Lilydale Park. So as the responsible government unit for the EAW, it seems to me that would be within the purview of the City for this process. And, additionally, I know that reference has been made to the mistake or mistakes that are in the report, and I just have to ask, is the responsible government unit -- how is it that a document this important would contain mistakes such as the confusion around whether or not there will be motorized access to the lake or motorized vehicle access to get to the lake? I think we really need clarification on those points and a number of other things.

Grit Youngquist	
	I hope you'll forgive us, but we learn very hard, in the hard way over the last few years, that when items are in print and have been presented to the public by staff and consultants, that eventually they are presented as publicly supported items. And we are concerned that these things will take on a life of their own. So in closing, I would just say that I think there's a number of reasons that an EIS is called for. Thank you.
Response 1:	The purpose of the EAW is to aid in the determination of whether an EIS is needed due to the potential for significant environmental effects of the Project. Section 21 of the EAW addresses traffic analysis. The proposed project was developed through a process that included community input. The resulting plan is the subject of the EAW.

Grit Youngquist & Jon Kerr	
Comment 1:	A second, "future picnic shelter" shows up on map p.11 near Pickerel on what is being called a Gathering Place. It is unclear in the EAW what is meant or envisioned by this description just as it is unclear how large the building will be. Usage policies of picnic facilities are also not considered in this EAW. Will the picnic shelters always be open to the general public or will there be group events and rental reservation uses? How might that affect traffic patterns and maintenance issues? How will after-hours or illegal usage of parks facilities be addressed?
Response 1:	The information in the EAW reflects a full build out of the concept described in the 2010 Master Plan Amendment and the subsequent design development for the roadway, restroom and shelter designs as well as the plan for a continual trail through the park. These elements are described in Section 6 of the EAW. The size of shelters for Pickerel Clearing included in the EAW included a 6-table shelter (24'x48') and 2-table shelter (18'x32') and a 2- toilet restroom/storage building (31'x41') all with green roofs. Program development and recommendations are not within the scope of the EAW process. The picnic shelter was sized to accommodate two school-age class rooms of approximately 40 to 50 students at a time. The area high school uses Lilydale Regional Park for environmental education purposes, as such providing facilities for a small group setting was important. The shelters are currently not anticipated to be rental facilities, but the road through Lilydale Regional Park has in the past been closed for events such as Saint Paul Bike Classic. The City anticipates these periodic events will occur and limited access may occur.
Comment 2:	Nearby, a new 10' paved trail shows up, p. 10, in place of the existing, recently-constructed rustic trail along the lake. The small, current unpaved parking lot by Pickerel is replaced by a paved turnaround along with a new 25-car paved lot and a "future potential parking lot" (p. 11) along with on-road parking bays at several locations. Again, the EAW gives no explanation of the need for these changes and increases in paved surfaces with subsequent impacts on a natural-resources based park.
Response 2:	Section 6 of the EAW describes the project, including trails. Section 21 of the EAW evaluates traffic. Due to maintenance considerations within an area susceptible to flooding, the trail and parking lot will be paved so that it can easily be cleared to minimize closure. Determination of quantity of parking is related to the expected uses within the park. Parking will be phased as the master plan is implemented. The rustic trail constructed in 2009, along with the parking lot adjacent to Pickerel Lake, was intended to be temporary, and the gravel was not designed to function as a pervious surface. Relocation of the parking will allow additional lake frontage to be enjoyed by visitors while minimizing visual impact of the parking lot within Lilydale Regional Park. The EAW provides information on potential environmental effects to decision-makers for the proposed project. No effects of the project as described are identified as significant, such that avoidance, minimization, and compensation of potentially significant impacts are not feasible. The EAW does not play a role in the determination on the need for the project and the various project elements.
Comment 3:	Also revealing is a map in the report showing a second "future picnic shelter" of unspecified size located beside Pickerel in the new, now dubbed "central gathering area" of Lilydale Park;

Grit Youngquist & Jon Kerr	
Response 3:	Section 6 of the EAW describes the project. There is the potential for an additional shelter adjacent to Pickerel Lake; however, this would not occur without prior public input. An additional structure would only be considered if overuse of the one shelter becomes an issue. The information in the EAW reflects a full build out of the concept described in the 2010 Master Plan Amendment and the subsequent design development for the roadway, restroom and shelter designs as well as the plan for a continual trail through the park. This includes up to two shelters and a restroom facility in the open area by Pickerel Lake, referred to as "Pickerel Clearing". The size of shelters for Pickerel Clearing included in the EAW included a 6-table shelter (24'x48') and 2-table shelter (18'x32') and a 2 toilet restroom/storage building (31'x41') all with green roofs. All soil testing has been and will continue to be in accordance with the Minnesota Pollution Control Agency and all other agencies which have pertinent policies and regulations.
Comment 4:	Nearby a new 10'-wide paved trail will replace the current, recently-constructed rustic trail along the lake.
Response 4:	. The rustic trail constructed in 2009, along with the parking lot adjacent to Pickerel Lake, was intended to be temporary, and the gravel was not designed to function as a pervious surface. Due to maintenance considerations within an area susceptible to flooding, the trail will be paved so that it can easily be cleared to minimize closure.
Comment 5:	The current unpaved small lot by the lake still disappears in place of a new 25-car paved lot to be placed alongside "Pickerel Clearing". The "Clearing" is still planned to be built on the to-be-mounded-up site which is atop the continuing to decompose, gas-venting old town of Lilydale landfill.
Response 5:	<p>Section 6.8 discusses removal of contamination. Section 8 summarizes received and pending permits from the MPCA. Section 9 reviews potential environmental hazards and studies to date. Section 20 summarizes hazardous waste studies. The Minnesota Pollution Control Agency (MPCA) did not have additional comments on the EAW. To date, contamination identified within the park is associated with unregulated waste disposal. The management of this contamination has been on-going as part of the redevelopment of the park. The City has been working through the MPCA Voluntary Investigation and Cleanup (VIC) Program in an effort to address environmental issues in an on-going basis. This work includes investigation to identify contamination, preparation of plans to manage contamination identified, and implementation of these management plans. The MPCA VIC Program staff will review and approve the investigation and management plans prior to implementation by the City.</p> <p>As part of managing contamination at the park as it is developed, the City is committed to bring the Lilydale Dump site to recreational standards. The in-place management of contamination at the Lilydale Dump has been discussed with, and approved by, the MPCA as an option protective of the public for management of this contamination. The clean soil cover materials will protect the general public from the dump materials by preventing contact with the waste.</p> <p>Investigation of the Lilydale Dump has indicated that a majority of the waste materials buried in this area consist of inorganic materials such as brick, concrete, stone, scrap metal, metal pipe, wire, conduit, roofing materials and glass. These inorganic materials are not gas generating. Some wood has also been identified to be buried within the Lilydale Dump. Although wood materials will decompose, and generate gas in the process, the amount of wood debris appears to be minimal compared to other wastes identified.</p> <p>Post-cleanup soil testing at the project site has not indicated potential groundwater contamination. The MPCA has reviewed the Implementation Report summarizing cleanup efforts and did not see impacts to groundwater.</p> <p>The rustic trail constructed in 2009, along with the parking lot adjacent to Pickerel Lake, was intended to be temporary, and the gravel was not designed to function as a pervious surface.</p>

Grit Youngquist & Jon Kerr	
	Due to maintenance considerations within an area susceptible to flooding, the trail and lot will be paved so that it can easily be cleared to minimize closure. Relocation of the parking will allow additional lake frontage to be enjoyed by visitors while minimizing visual impact of the parking lot within Lilydale Regional Park.
Comment 6:	"Motorized use of the (Pickerel) lake is considered." p. 27. This introduction of a major new element to Lilydale Park goes completely unanalyzed. What would this mean to water and lake quality, fishing habitat, noise pollution, traffic in the park from boat trailers etc. and many other potential impacts? How might this impact protected species in the area including river otters and Blanding's Turtles? Pickerel is a generally shallow Lake. How would motorized boating churn up or otherwise affect bottom sediment and other life? How would invasive species in the lake such as milfoil be handled? Is it considered part of the Mississippi and are fisherman then to be obliged to clean boats and trailers in between the two launch sites? If so, who will be responsible for oversight and related costs? Are there any motor type/size restrictions being recommended for the lake? Again, why is this being considered a necessary option? On this issue alone, the Lilydale Park EAW needs to be redone.
Response 6:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended.
Comment 7:	The EAW does cite earlier local birding and other ecological studies that suggest increased park usage "has the potential to disturb both resident nesting and migratory species." p. 26. This wording refers directly to bird populations including bald eagles, red-shouldered hawk, peregrine falcons, Bell's Vireo etc. But it might also be applied to Lilydale's other wildlife populations including river otters and Blanding's Turtles, which the EAW acknowledges have been very recently tracked in the park. (Prior Parks' reports had suggested no sightings since the early 1990's) The EAW notes that extensive efforts will be made during road construction to provide for these protected species, including tunnels, signage etc. But there is little discussion about long-term impacts on habitat. p. 23. How will these impacts be mitigated if Lilydale is to remain a natural-resources-based park? How will migration patterns be affected by new roads and trail ways? There is minimal description of impacts on fish or aquatic life in Lilydale from the project's implementation. This comes despite bold descriptions in the EAW of project impacts that include both "improve fishing opportunities within Pickerel Lake," and "Maintain population of predatory fish." How will these possibly contradictory impacts be achieved? The EAW is totally silent.
Response 7:	The purpose of an EAW is to provide information on the environmental impacts of the proposed project and determine whether there is potential for significant environmental impacts. This information is reviewed to determine measures that could be implemented to avoid, reduce, or mitigate adverse environmental effects. Section 11 addresses Fish, Wildlife and Ecologically Sensitive Resources and recommends design considerations and construction practices for protection of Blanding's Turtles (see pg. 22) and otters to provide safe roadway passage. This will be taken into consideration as part of the review and decision-making for approvals and permits being applied for. Section 11.5 discusses the fish population and finds that no significant impacts to the lake are proposed or expected as a result of the park improvement project.
Comment 8:	Here are a few of the things we found in the report: A startling (never-heard-discussed-ever-before) comment that "motorized use of the (Pickerel) lake is considered."
Response 8:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended.
Comment 9:	The EAW declares that wetland impacts will be minimal with proposed trail improvements located to minimize impacts to the existing natural environment. p. 28. But curiously, their own maps show new trails and even the new roadway located in areas that have been recently blocked-off by water over existing trails in the park. Official Army Corps and federal Fish & Wildlife wetland areas are already located nearby construction areas. How exactly was final

Grit Youngquist & Jon Kerr	
	wetland delineation able to be determined in this portion of Lilydale (west of RR trestle) in December, 2010 - well before the entire roadway and trail design had been officially presented to the citizen Task Force and general public? Indeed, how could a full and valid delineation of wetland plants and soils be conducted after that year's early freeze and snow-pack of nearly a foot? MPCA reports filed by the city show contractors stopped removing Lilydale landfill contaminants at the 695 foot elevation to avoid requirements of a Minnesota DNR wetland review. But some of Parks' engineering maps appear to show roadway and trail improvements in areas below that same elevation. Has a DNR permit been sought and granted? We also note that Parks' trail plans appear to call for continuation of the old bike-path/ trail going directly into what is known as Wetland E. Parks' is clearly choosing not to correct this situation as part of its plan. While this may be grandfathered in legally, it raises both moral and practical considerations. How much more maintenance cost and park disruption will be required to deal with the almost annual flooding of this area of the path? How is public safety affected by having unsuspecting bikers and others coming into a pathway under water? How does deciding to allow continued disruption of a wetland area fit with Parks' goal of a "natural-resources-based" park?
Response 9:	The City is working with all wetland and floodplain regulatory agencies to ensure compliance and issuance of permits. Section 8 of the EAW provides the status of permits and approvals.
Comment 10:	All told, Parks' own figures show an increase in impervious surfaces of 3.3 acres or nearly 40%. p. 37. This increase comes despite still incomplete plans for future bicycle and pedestrian paths that have been partly displaced by the new roadway. It is also unclear whether it includes the second new parking lot, of unknown size, also shown on the p. 11 map. The EAW also does not explain why such an increase in pavement is needed or more desirable than gravel or other pervious surfaces in a natural-resources-based park.
Response 10:	Section 17 of the EAW addresses water quality. Stormwater management will be reviewed in the NPDES permit application, treatment and infiltration is proposed before it enters Pickerel Lake or the Mississippi River. The available detailed design was reviewed for the EAW. Despite the perception that gravel is pervious, the material used in the Pickerel Lake parking lot and the lakeside trail was not designed to facilitate infiltration. An increase in impervious surface does not imply that increased untreated runoff to aquatic resources will occur. Pervious paving systems were explored, but ruled out in the floodway due to the deposit of materials during and after flooding which negate the pervious properties. The proposed parking lot will be the same size as the existing lot at 25 stalls.
Comment 11:	A related risk that is similarly unexamined by the EAW is the issue of building a roadway on the Lilydale Landfill site. There is no indication of how this will be engineered over a still decomposing, gas-venting area. Similar projects in other communities have reportedly resulted in both greater construction and ongoing maintenance cost increases. One needs only to take a look at the potholes in the current bike path portion which crosses just a few feet of the Lilydale Landfill to see the issue. The new roadway would cover several hundred yards. Engineers in other cities have also noted that pavement can trap venting gas from landfills. Sinkholes can happen anywhere in the landfill region, with resulting risks to roads, buildings and utility lines. Drilling deep footers to stabilize buildings also runs the risk of creating more runoff routes for water through polluted areas into the groundwater. At the very least these issues raise the question of increased maintenance. Will this also result in more repair vehicles and other impacts on a natural resources based park? The EAW has no analysis of any of these issues.
Response 11:	The clean up activities are described in Section 6 of the EAW, all of which are subject to permits and approvals as listed in Section 8. . Excavation and remediation of the dump site in the corridor where the road surface is proposed is being completed so that the base for the road is stabilized. Half of that work has been completed. The other half will be done in the first phase so that the crushed material currently stockpiled in the Marina Dump Site will serve as road base. The road construction is being engineered specifically for the conditions that we have through the park. Helical piers planned for structural support of the restroom and shelter facilities are an approved method and minimize the exposure of contamination to the park.

Grit Youngquist & Jon Kerr	
Comment 12:	The EAW predicts traffic increases of 308 daily trips based only on their count of an increase of 77 parking spaces in the park. pp. 35-36. This includes inflated estimates of current parking availability at Pickerel Lake and Brickyard lots. Again, it is unclear whether this includes the second "optional" lot shown on the p. 11 map. The EAW's likely incomplete estimate of daily traffic already falls just under the legal threshold requiring more extensive traffic studies than the analysis that was done on one rainy weekend this past April. Apparently not accounted for in the EAW were possible increases in commuter traffic on the new roadway, dog park user traffic, Harriet Island event traffic, increased bicyclists etc.
Response 12:	Section 21 explains the traffic studies and findings. The second optional parking lot (30 spaces) is included in the predicted traffic increase in Lilydale Regional Park with a final increase of 77 parking stalls. Existing traffic counts indicate peak traffic occurring during weekday commuter times. However, peak park use will occur in the summer weekends. The EAW utilized both peak conditions in determining maximum peak hour traffic.
Comment 13:	Study of cumulative potential effects of a proposed plan is a requirement for the RGU under Minnesota Rule part 4410.1700. This includes "cumulative potential effects of related or anticipated future projects" when determining the need for an environmental impact statement. This EAW manages to dismiss this obviously broad area of analysis with one paragraph saying there are no cumulative effects identified looking solely at groundwater appropriation and stormwater discharges. Even if that conclusion is accepted, what of other areas such as wetland impacts in not only Lilydale Park, but the entire river valley, loss of wildlife habitat and change in migratory patterns, loss of tree cover and green-space, and more? What will be the potential cumulative traffic impacts of adding a new roadway route for Harriet Island events such as the Rivers Edge Festival, for example, which are expected to grow in size and demands? An even bigger potential question might be how this project will cumulatively impact and be impacted by other Saint Paul Parks' river valley projects. Great River Passages is currently being reviewed at this moment with major potential impacts on every phase of Mississippi River valley parks in Saint Paul - including Lilydale. Parks' envisions a new administrative division receiving and implementing nearly a half billion dollars of projects through state Legacy grant funds, but Great River Passages is not even mentioned in this EAW. Clearly there is a connection between impacts in all the parks, even in Saint Paul Parks seeks to disconnect Lilydale in this plan for its own purposes. Environmental impacts should not be measured by funding streams and administrative categories. This issue alone deserves a full EIS analysis with Lilydale as the first impacted park.
Response 13:	"Cumulative potential effects" means the effect on the environment that results from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned or for which a basis of expectation has been laid, regardless of what person undertakes the other projects or what jurisdictions have authority over the projects. References to the entire river valley losing wildlife habitat, tree cover and green space are speculative and do not take into account the specific mitigation measures proposed to deal with identifiable problems the Project might reasonably pose. No new road is being added. The Great River Passage Master Plan carries forward initiatives and potential projects already included within Lilydale's Amended Master Plan. The City works in partnership with the DNR, Ramsey County, the Army Corps of Engineers as well as other regulatory agencies in looking at impacts of any projects.
Comment 14:	The EAW briefly discusses potential environmental hazards in the project area, citing Parks' claims that a major goal is to "remove existing debris and rubble within park and restore to naturalized condition." p.8 But interestingly the entire road realignment and structures plan still revolves around building on the remaining Lilydale Landfill site with no more removal of polluted material. The EAW acknowledges, but goes little further, in discussing potential human and environmental dangers. Parks' own environmental consultant reports have earlier expressed

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	<p>serious concerns about building on a still decomposing and gas-venting landfill. A Phase II Environmental study in 2010 found that aside from asbestos, which Parks' believes will be contained by capping the mound on which a picnic pavilion and other buildings will be constructed, there are other contaminants of continuing concern. In particular, it noted that the threat to groundwater quality by lead and potentially antimony, cadmium, copper, selenium and zinc leaching from the waste material may warrant additional protective measures. The EAW does not appear to address this issue. Is it now entirely established that there is no remaining threat to groundwater? If not and such a threat later appears how much more costly will it be to address once six more feet of fill and buildings have been mounded on top of the landfill? Parks staff has made the decision that further removal of contaminants is too financially costly, even though they also often describe their interest in restoring the park to naturalized condition. As the Responsible Governing Unit does the City of Saint Paul really want to take that risk just to build a picnic pavilion and maintenance building there? Couldn't restroom needs be accommodated in some other fashion, including satellites or portable (compostable) stations more appropriate in a floodplain, natural-resources-based park?</p>
Response 14:	<p>The City has been working with the MPCA to meet all standards and requirements for the agency to issue permits and approvals. The city will work with Dakota and Ramsey county staff for all required approvals. The EAW did not uncover any information about the contaminants that was not already known or that is anticipated to cause potentially significant effects that cannot be permitted. Excavation and remediation of the dump site in the corridor where the road surface is proposed is being completed so that the base for the road is stabilized. Half of that work has been completed. The other half will be done in the first phase so that the crushed material currently stockpiled in the Marina Dump Site will serve as road base. The road construction is being engineered specifically for the conditions that we have through the park. Helical piers planned for structural support of the restroom and shelter facilities are an approved method and minimize the exposure of contamination to the park.</p>
Comment 15:	<p>The EAW also mentions that a goal of the plan is to "create views of Mississippi River along Water Street," p.8. There is no explanation of how they are possibly going to do that in areas of the park where it does not already exist. The only conclusion can be that there must be anticipation of extensive tree and underbrush cutting. Another indication of that would be Saint Paul Park's recent announcement they are seeking another \$500,000 in Lessard-Sams state funding for to fund successful habitat enhancement and native plant restoration after roadway and trail construction is completed. We suppose that could be called natural-resources-based park planning. But exactly how many trees are expected to be lost in this project? How many have already been lost? There is no information or examination in the EAW. Are trees no longer part of the environment to be impacted?</p>
Response 15:	<p>Section 10 of the EAW identifies the acreage of before and after cover types, including the wooded/forest area. As stated on page 13 of the EAW, special consideration has been given to avoiding mature cottonwood trees in the road realignment. Construction practices will be used to preserve trees within 10 feet of the road shoulders. Of the 1.69 miles of roadway, .33 miles is new alignment through existing park land and .35 miles of road will follow the existing regional trail corridor. To ensure that significant trees would not be removed through roadway construction, the city staked this .68 mile section of roadway and made adjustments to save the greatest number of trees possible. The City's environmental services continue to manage vegetation to remove invasive species and encourage native species through the park in an effort to enhance habitat. The City continues to seek funding that will allow improvements outlined in the Master Plan to be made, including funds for vegetation and habitat enhancements.</p>
Comment 16:	<p>A large dog park is planned for Lilydale Park. What human and environmental impacts might that be expected to have? What bird or mammal migratory patterns might be affected? How will it impact vehicle traffic and parking needs? Will there be increased maintenance needs? Will dogs be allowed to swim in the Mississippi River and might that have environmental or health impacts? Could feces seep into the river or watershed? None of these subjects were reviewed by</p>

Grit Youngquist & Jon Kerr	
	the EAW. While we personally might support the dog park as part of the project, we support a full assessment of potential environmental impact and find the EAW is totally inadequate in this important area.
Response 16:	The City will fully comply with future environmental review and permitting which may be required for the dog park. The proposed project has been evaluated in accordance with laws of the State of Minnesota for environmental review. The EAW is not a means to approve or disapprove a project. Rules for the issuance of permits, including the opportunity for public comment, are another regulatory tool for managing environmental impact.
Comment 17:	<p>We are writing to express our concerns about the recently released Lilydale Regional Park Amended Master Plan Environmental Assessment Worksheet (EAW). A number of clear flaws and gaps will be described below with Lilydale Park's future as a "natural resources-based park" being left in similar doubt as a result. The EAW's shortcomings leave a clear conclusion that a full Environmental Impact Statement needs to be ordered by the Responsible Governmental Unit (RGU). From its beginning, the EAW shows inherent bias, with its official "Description" (Point 6) in violation of EQB guidelines for EAW preparations by including a number of items which are clearly only there to justify or promote the project. There is no description of how some of these measures are to be implemented or constructed. Thus there can be no analysis of what environmental impacts the described measures might have environmentally in Lilydale Park. Included are generalized and undefined descriptions such as "Minimize impact to restored landscape by preserving large tracts of land for habitat," "provide diverse emergent and submergent plant communities within lake," "create natural habitat areas for birds within migratory flyway," "create site lines into park through removal of dense invasive undergrowth," "Improve Safety and Security within the Park," and "Strengthen Connections to Mississippi River." None of these descriptions and assumed outcomes have any subsequent testing within the EAW. Yet another clear sign of bias in the EAW is its lack of examination of current Lilydale Park status and needs. While the report largely justifies Parks' staff plans for a new roadway, parking lots, buildings etc. and how these things could fit in a "natural resources-based park." The EAW never addresses, let alone answers, the question of why these intrusive elements are needed in such a park - or in Lilydale Park in particular? Has there been public demand expressed in some measurable fashion for more parking lots, more buildings with "vistas of Pickerel Lake", "views of the Mississippi River along Water Street" etc. as EAW describes? Have traffic studies indicated a need for a new road alignment in the portion of Lilydale Park (west of the railroad trestle) - the area least currently affected by chronic erosion or public safety concerns? Have there been public surveys showing these first stage projects anywhere near the top of citizen preferences? The EAW provides no information on these subjects. Similarly, the EAW does not appear to address how this plan fits within Mississippi River Critical Area Program whose standards are administered by the Department of Natural Resources in partnership with the Mississippi National River Recreation Area (MNRRA). Have those two agencies been contacted and officially reviewed this plan? How might new rulemaking plans affect future development in Lilydale? As the Responsible Government Unit (RGU) for this EAW, would that not be a responsibility of the City of Saint Paul? There are a number of other obviously unanswered or only partially addressed issues that the EAW inadequately addressed:</p>
Response 17:	The comment is incorrect in referring to numerous elements from the 2010 Master Plan Goals and Objectives (page 7 of EAW) as the project description. The information provided is background to describing the project details being reviewed in the EAW. Sections 6.4 through 6.9 describe the project being evaluated in the EAW. The EAW is not a means to approve or disapprove a project. Rules for the issuance of permits, including the opportunity for public comment, are another regulatory tool for managing environmental impact.
Comment 18:	Finally, and this speaks to the credibility of the entire EAW: How is it that a document as important as this would contain "mistakes" such as references to motorized use of Pickerel Lake? Mistakes do happen especially when there is haste to rush ahead and no sense of consequence. But there is no need for haste and there are definitely major consequences for Lilydale Park if this

Grit Youngquist & Jon Kerr	
	plan goes forward as is. We urge you to take back this entire report and do a full EIS. We cannot afford another mistake in a special place like Lilydale Park.
Response 18:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended. (There was one typographical/editing error that resulted in one reference to motorized among multiple correct references to it remaining non-motorized)
Comment 19:	There is more of the report we need to read, but clearly Parks' staff has no shortage of ideas for how to "improve" Lilydale Park.
Response 19:	This does not relate to the environmental impacts of the Project.

Halle O'Falvey	
Comment 1:	And I use Lilydale Park quite a bit. I ride my bicycle down there from across the river, and I can get off my bicycle and feel like I'm out in the woods. Recently, I watched five wood ducks, four males and one female, and just -- I was able to have, like, a good 20 minutes watching them do that. And if we've got -- like, everyone's talked about the buildings and changing it to be more like Harriet Park or Harriet Island would take away from what it is right now. And I -- and John, John Kerr talking about accessibility. It would be great if we could have paths for people in wheelchairs to get around and have the paths be safe, that we don't have to come out, jet out, in and out. I mean, I can't imagine what it would be like on a wheelchair. It's difficult on a bicycle and especially under the bridge, under the train bridge. So I don't -- I'm talking more on emotion than technicalities. It's lovely to be able to have -- this is an urban wildlife refuge that we live on and it would be just fabulous to keep it in that, with that integrity.
Response 1:	Accessibility and continuity of a regional trail within Lilydale Regional Park are addressed in the planned improvements for Lilydale Regional Park.

Jocelyn Sweet	
Comment 1:	I think long before I moved to a place that was so close to Lilydale, I found Lilydale. And it is a treasure, it is a national treasure. It's a national migratory path for habitat. And my concern, we have real -- going on right now with fossil fuels and we need to be cutting back on them. So the bicycle paths in Lilydale are imploding with the landfill. So I really want it to be slowed down, this process, and have the EIS done to really think clearly about the need, you know, for more of an expansion of roads, for cars in this day and age. Future forward, I have a couple teenagers that really -- I can actually convince them once in a while to come down and hike and bike with me down there, and I'd like to see some more canoeing and non-motorized vehicles on the river. The rowing club, for instance, that my son participates in is an excellent choice of activity down there. Otters, my daughter's favorite mammal, you tell me that there's a risk to an otter, I'm all over that. So I really want this to be thought out a little more clearly with future forward. And I think that's about all I need to say at the moment. If you were to put a road in, too, I would want to know the design of that road such that is there a way to do a honeycomb style road that would be more porous? Get some of the good 3M engineers working on that. It's not just a asphalt road if you are going to do it, at all, which I would strongly recommend not doing in this day and age. Thank you.
Response 1:	The EAW is not a means to approve or disapprove a project. The Master Plan included a road realignment to provide better spaces within the park for habitat and for people to enjoy the natural resources within the park. The design of the road includes provisions to protect species like the Blanding's Turtle and River Otter with signs and wildlife crossings. Resources within the park including the bluffs, lake and wetlands will continue to be protected and enhanced as funding is secured.

Jon Kerr	
Comment 1:	<p>Obviously, in three minutes there's an awful lot of things that I'd like to say that I can't get in. I'm going to focus on a couple things that were kind of important to me. One of them is kind of a little bit of human environment, but the question of accessibility. The term is often used or sometimes used to describe the benefits of this plan that's being supported by park staff and a few others. It's interesting to us, Friends of Lilydale Park, because we've always felt for 12 years that we were to provide accessibility to a lot of users of the park through educational opportunities, the hiking, the fishing, the lake event, the fossil hunts, sports activities, and more, as well as promoting physical improvements such as trails, benches, and signage to make people more familiar and accessible to the park. Speaking also personally, I guess, as someone who has family members who suffer from lifetime disabilities, I've had concerns to see how this plan impacts that area. It happens, I also recently ran into a woman and her husband in a motorized wheelchair on the trail, and I haven't -- you know, it's a good time to talk to them. And so I asked them, would what would you folks change about Lilydale Park? What would you like to see? Without hesitation, their response was they would like to eliminate the dangerous parts of the road where the path goes on and off and they have to literally drive with cars onto the road. That inhibits them. I think it does a lot of people, actually. So the fact is that I think everyone should realize is that as presently staged and funded by Parks, this plan will for the foreseeable future do nothing for increased accessibility in those areas. In fact, by deciding against doing first the most needed partnered road and trail improvements coming from Harriet Island to the brickyard area, Parks is actually saying that accessibility is not a top priority. The EAW does not address this area of concern. Another major area that the EAW barely addresses in one paragraph, but it's required under Minnesota rules, part 4410, is the cumulative potential effects of a proposed plan. This EAW really talks in one paragraph about a couple of areas, groundwater appropriation and storm water discharges. Even if we accept their conclusions there, that leaves a lot of areas that aren't touched, like wetland impacts, fossil and wildlife habitat, change in migratory patterns, loss of tree cover and green space. What will be the potential cumulative traffic impacts of adding a new roadway for Harriet Island events, such as the upcoming River's Edge Festival or the longer term effects of commuter traffic coming to and from downtown St. Paul on a new and wider road? Similarly, Great River Passages is currently being reviewed at this moment with major potential impacts on every phase in the Mississippi River Valley Parks in St. Paul, including Lilydale. Parks and Visions, a new administrative division, receiving and implementing nearly a half billion dollars worth of projects for State Legacy Grant Funds. The Great River Passages is not even mentioned in this EAW. So this issue alone I feel deserves having a full EIS analysis. I urge them to have it.</p>
Response 1:	<p>No new roadway is being added. The one section with alignment change is new, but otherwise the road is designed to accommodate the existing traffic pattern, rather than introduce additional traffic... In Section 6 of the EAW, The project description states the natural resource priority of Lilydale Regional Park, which as you point out is in contrast to the more manicured use of the adjacent Harriet Island. The EAW has been screened for potentially significant effects that could negate the issuance of permits, including permits from the Minnesota Dept. of Natural Resources for activities within the floodplain. The proposed project has been evaluated in accordance with laws of the State of Minnesota for environmental review.</p>

Josh Nelson	
Comment 1:	<p>So just a couple quick comments. I know you touched on the motorized use of -- of Pickerel, but I guess my comment is how is that going to be stricken officially from the EAW? Is it going to be noted somewhere in it that it's a mistake? I'd like to see that happen. My other comment was in - the EAW talked about the enrollment in the PCA's VIK program, but didn't talk about where they're at. I'm curious where that stands. And then in the -- in the program, it talked about the boat launch. Was the boat launch still part of the non-motorized part of it or was the boat launch attached to the idea of motorized use? That, I think, needs to be clarified a little bit. And I guess in summary, I don't think, you know, whether it was the -- the impact of -- of cleaning up Ivy Falls and the storm water and how that would be mitigated, I don't -- I don't think there's a whole</p>

Josh Nelson	
	lot of findings. So I think an EIS is warranted in this. I'd like to see that.
Response 1:	Pickerel Lake will remain a non-motorized lake. Reference to motorized boats in the EAW was unintended. All other references to Pickerel Lake refer to it being non-motorized. This was clearly a single error. Section 8 summarizes received and pending permits from the Minnesota Pollution Control Agency (MPCA). Section 9 reviews potential environmental hazards and studies to date. Section 20 summarizes hazardous waste studies. The MPCA did not have additional comments on the EAW. The Ivy Falls stormwater is proposed as a future activity and not reviewed in this EAW. Public input and permitting will be sought at that time.

Julie Nelson	
Comment 1:	I would like to see an EIS. You know, I walked away from reading this not fully understanding the full implications and impact of truly what is happening. A lot of instances where we list the habitat. What's happening to the habitat? Here are some species that we're concerned about, but what do we expect to see, you know, before the construction, during the construction, after the construction? How much habitat changes there are they displacing these animals? What percentage of the population do we expect to see displaced or destroyed due to this? I have to say I'm concerned with all of the building that is supposed to be for viewing nature and appreciating it that we might not have that nature to appreciate. So I do think that we want to see more details and truly see, as outlined here, you know, how those resources are impacted, how they're affected by the project. And I see some of those details missing, so I'd like to see more of that. And I think an EIS is warranted.
Response 1:	Section 11 of the EAW addresses species and habitat. The discretionary EAW did not find that the Project had potential for significant environmental effects, and no EIS is warranted.

Karen Kromar – Minnesota Pollution Control Agency	
Comment 1:	Physical Impacts on Water Resources (Item 12): This section of the EAW indicates that the Project will result in wetland impacts. A Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE) for Project related wetland impacts may be necessary. Please be aware that if a USACE Section 404 Individual Permit is required for any Project activity, then an MPCA CWA Section 401 Water Quality Certification or waiver must also be obtained as part of the permitting process. The Section 401 Water Quality Certification ensures that the activity will comply with the state water quality standards. Any conditions required within the MPCA 401 Certificate are then incorporated into the USACE 404 Permit. You can find additional information about the MPCA's 401 Certification process at www.pca.state.mn.us/water/401.html . For further information about the 401 Water Quality Certification process, please contact Jim Brist at 651-757-2245 or Judy Mader at 651-757-2544.
Response 1:	The City will comply with all permit requirements for the Project.

Kathryn Engdahl	
Comment 1:	I just -- I'm going to speak a little less technically and more personally. Lilydale Regional Park is one of the greatest assets of this area. It's lovingly dubbed the Wild Sister of Harriet Island. And I'm concerned that this plan is making Har -- making Lilydale Regional Park more like Harriet Island, creating spaces that I wonder -- similar to possibly that on Raspberry Island and I'm wondering how many usage that's getting. It seems to me that the greatest -- I mean my experience in going to Lilydale on almost a daily basis and oftentimes a weekly or more recently a weekly basis is that the greatest treasure of Harriet Island (sic) are the natural resources. And we're talking about putting all these buildings and stuff there. And I'm -- at the same time, I'm

Kathryn Engdahl	
	<p>not seeing the preservation of what is there. I'm seeing a hugely disturbing amount of erosion by hidden falls. I mean, the bluff is just collapsing down into that stream, and what -- where is the plan addressing that? Are we just going to let Lilydale Regional Park decay and fall apart while we create these other structures? I mean, I don't understand. I don't see where there's provision for, really, lovingly preserving what beauty and magnificence is there. I've seen -- I've personally seen cougar, I've seen deer, all kinds of wildlife, and I'm very concerned about what's going to happen to them. I've seen them wandering into what has been basically an appalling clear cut what's to be the dog park. I understand that was cleanup, but I was just shocked when I -- when I saw the removal of just magnificent, magnificent trees and natural space along the river for, apparently it was as -- as cleanup. I -- I very strongly feel that there should be an EIS, an Environmental Impact Statement, to, if nothing else, to slow this process down and take a very serious look at the park as a whole, not just at these little planned changes, to say whether they're going to work or not work, but what is happening overall at this wonderful treasure that we have. What are we doing to preserve what we have, and -- and everywhere, not just where the changes are planned. Thank you. Okay. The -- May of 2009, in the Lilydale Park Resources Management Plan, it said that it's top priority is the quality of the water and the lake and the stabilization of -- of the bluff. And what's happening with that?</p>
Response 1:	<p>Lilydale Regional Park's former uses included the brick factory, housing and both permitted and unpermitted dumping. Many of the species that have grown over these former uses are aggressive and non-native species which are not as beneficial to wildlife and habitat as this land could potentially be. The City's intent is to emphasize the park's "natural" aesthetic through the remediation of contaminated areas, management of invasive species, provision of educational programming and interpretive signs which in combination will help to enhance natural resources within Lilydale Regional Park. Resources within the park including the bluffs, lake and wetlands will continue to be protected and enhanced as funding is secured. The discretionary EAW did not find that the Project had potential for significant environmental effects, and no EIS is warranted. Concerns about wildlife habitat and ways to mitigate impacts are discussed in Section 11 of the EAW.</p>

Lynn Thompson - Dakota County	
Comment 1:	<p>Stormwater management will be important during construction in contaminated areas because, when contaminated soil is exposed, the risk increases that contaminants will find their way into sensitive areas. We anticipate that stormwater will be managed according to requirements of the Municipal Separate Storm Sewer Systems (MS4) permit that regulates operation of storm sewer systems. Also, note that a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Construction Stormwater General Permit is required for erosion, sediment control, and water quality for construction activities. It is possible that an Industrial Stormwater Multi-Sector General Permit may be required for onsite stormwater/pollution controls at commercial/municipal/industrial sites. If sediment washes off the contaminated portions of the dump area, the sediment should be considered contaminated and should be managed as directed in the Response Action Plan/Construction Contingency Plan or the Storm Water Pollution Prevention Plan. Please coordinate with the Lower Mississippi Watershed Management Organization regarding water quality monitoring of Pickerel Lake as well as stormwater inflow issues with Ivy Falls. Dakota County's Soil and Water Conservation District staff members are also a resource for stormwater management. Finally, a last point about storm water issues: the EAW references adding and replacing impervious surfaces. With the additions of impervious surfaces in parking areas, perhaps planners could consider instead using pervious pavement (either asphalt or concrete) where appropriate, to help with infiltration and water quality.</p>
Response 1:	<p>Section 8 of the EAW provides the status of permits and approvals. Correspondence with NPDES/SDS and RAP staff is being used to ensure compliance and issuance of permits. The City will coordinate with the Lower Mississippi Watershed Management Organization. Various alternatives for stormwater management have been considered for the proposed project,</p>

Lynn Thompson - Dakota County	
	including pervious pavement. At this time it does not appear to be feasible to use pervious pavement in the flood prone areas.
Comment 2:	<p>We commend the City of St. Paul Parks and Recreation staff for their significant efforts in recent years to investigate and remediate the known, historically contaminated sites located within the boundaries of Lilydale Regional Park. The City staff members have been diligent in investigating and, to the extent funding has been available, cleaning up the sites identified as the former Marina Demolition Dump and the Lilydale Park Dump. The former Marina Demolition Dump has been remediated with the exception of a few areas of elevated lead contamination and remaining debris along the riverfront. The City intends to remediate these areas as funding becomes available or when the area is developed for a proposed dog park. Contaminated Soils: City staff also has made good progress with the Lilydale Park Dump site, which has been investigated and partially remediated. Based on information provided directly to the County or included in the EAW, the City plans to partially remediate the Lilydale Park Dump by removing contaminated soil and waste debris from the alternative alignment for the Lilydale Road corridor. The EAW states that Park facilities will be built on top of the dump material or will be built on the portion of the soil and debris that is determined to be reusable. A stockpile of crushed concrete and bricks from the marina demolition dump is intended for use as road base. If contaminated soil is left in place and facilities are built on top or utilities placed within it, please be certain to fully evaluate the potential for any vapor intrusion and migration pathways for contaminants. Please be advised that both the state Pollution Control Agency's guidance on best management practices for unregulated fill and Dakota County's Solid Waste Ordinance 110, may limit which soil can be used, and how it may be used, at the site. The County's Solid Waste Ordinance can be found on Dakota County's website at this link: http://www.co.dakota.mn.us/LawJustice/Ordinances/CountyOrdinances/Ord110.htm and Dakota County staff is happy to answer questions or concerns about it.</p>
Response 2:	The City will fully address the points brought forth in this comment and expects to maintain close contact with the MPCA and county staff specialists on future decisions regarding management of demolition and other kinds of regulated or unregulated contaminants in the park.
Comment 3:	<p>The only roadway that Dakota County is directly interested in (as described in this EAW) is the portion of County Road 45 (Victoria Road) that is scheduled to be turned back to Mendota Heights and Lilydale. We have no concerns about the trips per day estimate; the numbers seem reasonable and well within the capacity of the reconstructed roadway. Because we hope it may encourage more people to visit the Park using transportation modes other than motor vehicles, we support the proposal to widen and resurface Lilydale Road within the Park. Also, we emphasize the importance of the Lilydale Road connection to Dakota County residents. The Lilydale Road connection to Hwy 13 is the primary way that Dakota County residents access Lilydale Regional Park, and it should remain open as shown in the EAW either as a city street or as a park road. From the County's standpoint, continuous trail connections that allow Dakota County residents to access and use Lilydale Regional Park and Harriet Island are an asset. Enhanced trail connections were an outcome of the master planning process that will enhance regional use of the Park.</p>
Response 3:	Comment noted.

Mark S Thomas	
Comment 1:	Would like to receive copy of responses.
Response 1:	Comment noted.

Mary Ann Heidemann - Minnesota Historical Society

Comment 1:	<p>Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed, including historical archaeology. The survey must meet the requirements of the Secretary of the Interiors Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified. For your information, we have enclosed a list of consultants who have expressed an interest in undertaking such surveys. We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. Note: plowed areas and right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way. Although this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966, we understand that a Corps of Engineers permit has been or will be applied for. Therefore the Corps will be asking us to review this project under federal regulations as well (36 CFR 800). Because the Mendota Road Bridge is listed in the National Register of Historic Places, we will at minimum want to review the construction plans for the new bridge, and rehabilitation plans for the old bridge, in consultation with the Corps of Engineers and the City, as part of the federal permit review process. The federal review process will also require a public outreach effort. Along those lines, please note that our office has been contacted by two members of the "Friends of Lilydale" group, which indicates to me that there is public interest in this project.</p>
Response 1:	<p>The City has moved forward to further investigate archeological features that could be potentially significant. The City will fully comply with all permit requirements on the Project.</p>

Matt Bukowski - Friends of Lilydale

Comment 1:	<p>I'm one of the Friends of Lilydale, and I like the park just fine as it is now. Or was before the implementation started. I like the fact it feels forgotten and abandoned, it makes it feel more like a natural forest then a "planned city park". I don't want a ton of yuppies 'hanging-out' there. I think we already have enough DOG parks and don't need one there.</p> <p>Obviously I know that area was once a town and a brick factory so it's NO way in it's untouched and natural state. But, I like how nature reclaimed it, too many invasive species but still it's ok. I just think taxpayers' money could be better 'wasted' then on projects like this. I don't care if those taxpayer dollars are state, county, city, or federal.</p> <p>I threw a fit when I was down in Harriet Island and looked across the river to see those horrendously ugly apartment complexes or condos or whatever they are. Just picture a grown man throwing a fit--it ain't pretty. If you want to do something with those tax dollars make sure the ENTIRE riverside is not developed by those horrendous structures. For a city that's actively trying boost it's image by bragging about our waterfront then huge buildings don't make the most impressive river views.</p> <p>If any of this sounds personal don't take it that way.</p> <p>You could not stop or change things even if you wanted to. I find politicians to be incredibly blind to the cares of their constituents; it's as if they actually BELIEVE that they know what's best for our city, our lives and our parks. This will just be some just another plume in the hat of some politician, he'll point and say, "See the nice changes to that park down on the Mississippi"--that was my idea!"</p>
Response 1:	<p>This does not relate to the environmental impact of the Project.</p>

Melissa Doperalski - Department of Natural Resources	
Comment 1:	Regarding sensitive and rare features, the DNR provided a response to a Natural Heritage Information System database request in a letter dated May 21, 2012. The letter included recommendations and comments pertaining to rare species and sensitive features within or in close proximity to the project location. From review of the EAW, avoidance and minimization efforts have been incorporated into project plans as recommended by the DNR. Project planners should contact Lisa Joyal, DNR Invasive Species Review Coordinator, at lisa.joyal@state.mn.us if they have any questions regarding those recommendations. Please note as identified in the EAW, portions of the project area are considered Central Region Regionally Significant Ecological Areas and Minnesota County Biological Sites of Biodiversity Significance. The DNR encourages minimizing impacts to these areas to the extent practical.
Response 1:	The City will continue to minimize impacts to all ecologically sensitive areas
Comment 2:	The EAW refers to the motorized public water access site in Lilydale Park as the "MnDNR boat launch". It should be noted that the public water access is funded in part by the City and managed with cooperative development dollars. The DNR does not maintain or manage the site except to ensure that the site is managed consistent with the cooperative agreement. The DNR appreciates the EAW acknowledging that any change to the current public water access in Lilydale would require DNR approval.
Response 2:	The City will comply with all permit and approval requirements for the Project.
Comment 3:	Invasive species management should focus on reseeding disturbed areas immediately following disturbance activities and replanting with native-local approved seeds. These areas should be monitored during seed establishment for invasive species or other undesirable species. Measures for preventing the spread of Invasive species should be included in project planning. The DNR's website (http://www.dnr.state.mn.us/invasives/index.html) provides a useful guide. An updated MEMO on wildlife-friendly erosion control meshing is attached to this email for your reference.
Response 3:	Comment noted.

Michelle Hoffman	
Comment 1:	I'm concerned that this plan will bury toxic pollution before it is fully studied and mitigated. And I would like to assume that the toxins in the ground will be fully examined and cleared of any concern before they are covered over. But to start at the landfill before any place else seems imprudent to me. Especially since it is unclear as to whether any further study will be complete before the area is buried. The EAW states that a Remediation Action Plan will be conducted but shouldn't that be complete before burial? Why begin at the landfill? Why not proceed elsewhere in the plan until all questions and concerns are raised and mitigated? The EAW briefly discusses potential environmental hazards in the project area, citing claims that a major goal is to "improve safety and security" by "remove existing debris and rubble within the park and restore it to a naturalized condition." But the entire road realignment and structures plan still revolves around building on the remaining Lilydale Landfill site with no more removal of polluted material. The EAW acknowledges but goes little further to discuss potential human and environmental dangers. Earlier Parks environmental consultant reports have expressed concerns about building on a still decomposing and gas-venting landfill. A Phase II Environmental study in 2010 found that aside from asbestos, which Parks believes will be contained by capping the mound upon which a picnic pavilion will be constructed; there are other contaminants of continuing concern. In particular, it noted that the threat to groundwater quality by lead and potentially antimony, cadmium, copper, selenium and zinc leaching from the waste material may warrant additional protective measures. Parks describes the investigation into pollution at the Dump Site as "limited" on page 14 of the EAW. The site is currently under investigation and remediation. And the city is investigating the problem further by preparing a Response Action Plan. Wouldn't it be prudent to

Michelle Hoffman	
	postpone the picnic pavilion until the outcome of these investigations is complete? The EAW does not appear to address this issue. Is it now entirely established that there is no remaining threat to groundwater? If such a threat later appears how much more costly will it be to address once six more feet of fill and buildings have been mounded on top of the landfill? Parks staff has made the decision that further removal of contaminants is too expensive, even though they also often describe their interest in restoring the park to a naturalized condition. As the Responsible Governmental Unit (RGU) does the City of Saint Paul really want to take that risk just to build a picnic pavilion and maintenance building here? Couldn't restroom needs be accommodated in some other fashion, including satellites or portable (compostable) stations more appropriate in a floodplain, natural-resources-based park?
Response 1:	Section 20 of the EAW addresses Solid Wastes, Hazardous Wastes and Storage Tanks The City has been working with the MPCA to meet all standards and requirements for the agency to issue permits and approvals. The City will work with Dakota and Ramsey county staff for all required approvals. The EAW did not uncover any information about the contaminants that was not already known or that could lead to potentially significant effects that cannot be remediated.

Patrick Boylan - Metropolitan Council	
Comment 1:	Metropolitan Council staff has reviewed the EAW on the project described above to determine its adequacy and accuracy in addressing regional concerns, its potential for significant environmental impact, and its consistency with regional plans and policies. The EAW proposes improvements to Lilydale Regional Park, which is a component of the metropolitan regional parks system, overseen by the Metropolitan Council. The Council staff finds the document to be complete and accurate, and an EIS is not necessary for regional purposes. The Metropolitan Disposal System has adequate capacity for this project location. The improvements described are consistent with the Lilydale Regional Park Master Plan Amendment, which was approved by the Metropolitan Council on January 13, 2010.
Response 1:	Comment noted.

Peggy Lynch - Friends of the Parks and Trails of St. Paul and Ramsey County	
Comment 1:	We have not seen a plan for the trails through the park. Lilydale Park has been primarily a bike/pedestrian park for years, yet this very important aspect of the park is missing. There are references in the document that the bike/ped facility will be combined. We believe this unfortunate as the combination of bikes and pedestrians present extreme safety hazards. Safety should be the first concern in a park primarily used for biking and walking.
Response 1:	This comment does not relate to the environmental impact of the Project. The information in the EAW reflects a full build out of the concept described in the 2010 Master Plan Amendment and the subsequent design development for the roadway, restroom and shelter designs as well as the plan for a continual trail through the park. These elements are described in Section 6. Trails included in the EAW are shown in Figure 6.2. It is not within the scope of the EAW to determine the appropriate layout or programming for a project. However, the city has provided the following clarification regarding design. Existing trails within Lilydale are 12' wide shared use trails. The introduction of separated trails will consume additional park land including removal of additional trees and an increased amount of impervious surface. The 12' wide regional trail has been determined to be sufficient for predicted use. Therefore proposed trails will remain shared use trails with signage that facilitates this use and cautions traffic at key intersections. Additional precautions will include lighting, on road parking stalls at road/trail intersections as well as the provision of bike shoulders for cyclists.
Comment 2:	Mitigation for the filling of wetlands where a new bridge will be constructed is not outlined, only that there will be mitigation. At the meeting on June 18 the speaker said wetland banks will be

Peggy Lynch - Friends of the Parks and Trails of St. Paul and Ramsey County	
	used for the mitigation but he had no idea where the wetland banks were located. In 1997 when the Metropolitan Airports Commission filled in wetlands at the St. Paul Downtown Airport, mitigation was undertaken at Pickerel Lake and other places in Ramsey County, rather than Nobles County, which they originally proposed. There should be an effort to mitigate someplace else in Lilydale Park or at least in Ramsey County.
Response 2:	Section 8 of the EAW lists the status of permits and approvals. All required wetland permits are in process. Mitigation will be performed in accordance with conditions in the authorized permits.
Comment 3:	We are very concerned about having a cast-in-place fireplace in a park shelter in the park that is open 24 hours a day. If one is developed, the possibility of vandalism must be first addressed.
Response 3:	This comment does not relate to the environmental impact of the Project.
Comment 4:	The park lies in the RC-1 Floodway District (River Corridor Floodway Overlay District) and the RC-2 Flood Fringe District (River Corridor Flood Fringe District so the city must meet the standard for a Conditional Use Permit (CUP) of those Districts. However, we have to ask if the city would give a CUP to a private developer. Should the city be allowed to build in the floodplain? The present underlying zoning of this park (R-4 One Family Residential) is in violation of the City's Comprehensive Plan which calls for this land to be zoned Park Land. The EAW does not explain how this conflict between the existing zoning and the Comprehensive Plan will be resolved before this amended Master Plan can be implemented by the projects being proposed.
Response 4:	Section 8 of the EAW provides the status of permits and approvals, including construction within the floodway. Conditional Use Permits authorize certain activities within the floodway; however, those activities are evaluated on set criteria.
Comment 5:	This section does not address the cumulative potential effects of the number of new buildings, increased parking, and increased traffic resulting from park development. The park is now a natural park, but what will be the effects of numerous new buildings, a dog park, parking lots on a natural area, etc. P. 15 states, "The proposed project will restore the park to a natural resource-based park. How will the proposed buildings, etc. keep this park a natural resource park?"
Response 5:	The EAW addresses Cumulative Potential Effects in Section 29, and no potentially significant cumulative effects are identified with the proposed project. The environmental review process is not intended to discuss alternative uses of the park, only to screen for issues which could lead to a negative decision on any of the required permits.
Comment 6:	There are many people in the community who have expressed concerns about increasing development, including just about every speaker at the EAW hearing. We are aware that the Master Plan was approved with all of this development, but we are asking for a very close examination of the negative effects of the buildings, parking lots, dog park, etc. on the natural aspect of the park.
Response 6:	The EAW is intended to determine the potential for significant environmental effects of the proposed project before approvals or necessary permits are issued and to identify measures that could be implemented to avoid, reduce, or mitigate adverse environmental effects. The EAW is not a means to approve or disapprove a project. Rules for the issuance of permits, including the opportunity for public comment, are another regulatory tool for managing environmental impact.

Richard Arey	
Comment 1:	Ask the right questions: Statistically accurate surveys can be of value when allocating limited resources for park development. Recent Saint Paul surveys have lumped bicycling and walking

Richard Arey	
	together. They are different modes of transportation (bicycles are legal vehicles, for instance). It's great that surveys show bike/walk trails are one of the only things that citizens are willing to spend more tax dollars on but in areas of high use (ask Dakota County about shared use on the Big River Trail) it is much better and safer to have separated trails.
Response 1:	This comment does not relate to the environmental impacts of the Project. St. Paul's Department of Parks and Recreation strives to implement shared use trails where space allows. However, protection of existing trees, limiting impervious surface, and avoiding low areas in Lilydale Regional Park warrant a shared use path.
Comment 2:	Include all aspects of the park design when making public presentations: The "Present Project Plan" in the EAW is at least the fourth one I've seen and none of them were officially discussed in the community process. I believe it is seriously flawed for reasons that are mostly covered in the two attached papers, with one additional note: the narrower lakeshore trail will quickly become the preferred recreational route for cycles if it is paved/ ten feet would then be seriously too narrow for both cyclists and walkers to safely share.
Response 2:	This comment does not relate to the environmental impacts of the Project. The proposed project has been reviewed by the St. Paul Planning Commission's Transportation Board. The widths of the mixed use trails are in line with ASHTO and MNDOT requirements and recommendations. The intent of the trail is to provide a continuous trail while minimizing mandatory road crossings. Smaller loops are provided in the design for recreational use. The on-road bike shoulders are intended to provide a safe option for commuter cyclists and to encourage separation of faster commuter cyclists from recreational trail users. Signs will be posted to remind riders that it is a mixed use trail. The information in the EAW reflects a full build out of the concept described in the 2010 Master Plan Amendment and the subsequent design development for the roadway, restroom and shelter designs as well as the plan for a continual trail through the park. These elements are described in Section 6. Trails included in the EAW are shown on Figure 6.2. It is not within the scope of the EAW to determine the appropriate layout or programming for a project.
Comment 3:	Lilydale is the last largely nature tract of land left in the city. There is still widespread concern that building shelters, additional parking, more roads and trails plus a dog park – all within a floodplain – will fragment and degrade natural habitat, adversely affecting wildlife. That said, the bike lanes on the new curvilinear road will be excellent.
Response 3:	As provided in Section 8 of the EAW, permits and approvals are in process for all actions within the floodplain and will not be issued without due consideration of risks and mitigating all potential impacts. Section 10 discusses cover types and Section 11 addresses ecologically sensitive resources. . Natural resources within the park including the bluffs, lake and wetlands will be protected as funding is secured.
Comment 4:	The following comments supplement the Lilydale Modest Proposal (March 22, 2012) and the Draft Trail Design and Map (February 18, 2011) that are attached. They concern both the product (e.g. figure 6.2 – Present Project Plan in the EAW) and process. Perhaps they will be of value in developing Lilydale and the much larger Great River Passage.
Response 4:	Comment noted.
Comment 5:	Take minutes at public meetings, record decisions and disseminate results: This should be one of the biggest lessons of the Lilydale process.
Response 5:	Comment noted. Records of public meetings are on the City's website with both agendas and meeting minutes or notes included for public information.
Comment 6:	Closely consider construction phasing: at present, the most serious safety concerns in where trail users are forced onto the narrow road east of the railroad tracks. As it stands now this won't be addressed until Phase 2. (Currently funded?) Parks Foundation folks who ponied up big bucks

Richard Arey	
	for an elaborate entrance may also be chagrined that it will be built by the old road.
Response 6:	City Park staff converses with the St. Paul Parks Conservancy staff on a regular basis to coordinate efforts. In general, there is the recognition of funding realities and the need to phase implementation of large projects and it was their desire to get the gateway in now with the realization that the road would not be constructed immediately. The gateway will be constructed in August.

Sarah Prentice	
Comment 1:	Why does the city think that there will be enough traffic through the park to justify a parking lot and improved road? Lilydale park is connected to Cherokee Regional Park, so hard core hikers already have parking. Does Lilydale park offer anything to an audience outside of hard core hikers and ice climbers? No, it does not. It's steep bluffs, potential landslides and rubble through and through. If you're biking up from Harriet Island to Sibley Memorial Highway, it's beautiful, if you're walking down the (most often flooded) road to the fossil grounds, it's kind of a dump. I know that the purpose of the master plan is to change that. But the people who like Lilydale like it because it's filled with residential and industrial trash dating from 1880 to 1970, they like it for its vicious turkeys and stray dogs. People who prefer Harriet Island to a crumbling, muddy bluff, do you all think they'll be coming in droves once there's a bit of asphalt under the muck of the parking lot?
Response 1:	This comment does not relate to the environmental impacts of the Project. People of varying abilities will be better accommodated by localized parking within the park. Focused parking in the main gathering places as well as along the road at key points for traffic calming will be phased. The parking lots are being designed to minimize their visual impact and protect and save existing trees in those areas. One lot at Pickerel Clearing will be constructed initially with the provision of another if use requires it. The intent of the Master Plan and subsequent plan development has been and will remain to enhance the environmental and cultural amenities in Lilydale Regional Park. The removal of and capping of dump sites is necessary for the health, safety and welfare of the community which the St. Paul Department of Parks and Recreation is required to uphold. Lilydale was a town, then a dump and now has re-growth, however, much of the vegetation you see is neither native nor optimal for habitat. The end product is being planned as a much more sustainable and desirable landscape for the species in the park. And intrusions and effects on current habitat areas will be minimized through adherence to DNR regulations.
Comment 2:	Even Cherokee Park, with its playground and parking lot above, has its little gulleys, slope failures, and hobo settlements. Lilydale is nothing but those, and it's quite impossible to make an open parkland of it like in Cherokee. The other improvements are sane because they're about reducing erosion and making the park less hazardous, by degrees. Of course erosion and rock falls will continue to be regular, but maybe mitigating the landslides. I can see how adding interpretive signs that sensibly point toward the things they describe might attract more people. But it says something about the potential that the existing signage, while not that old, refers to some kilns that have been buried or crumbed away from view, or directs us down paths that are entirely stream. You can't engineer the park itself out of Lilydale park, the parking lot will be filled with silt and gravel and the hiking will be rough and difficult, whether you leave it or build something new: that's the geology of Lilydale. I'm not sure why this seems like a good investment. Even the police have a hard time figuring out where Lilydale is, and if you're trying to get someone from the neighborhood to find it, they don't understand until you say 'down by the dump?'
Response 2:	This comment does not relate to the environmental impacts of the Project.

Tess Rizzard - Planning Supervisor Mn/DOT Metro District	
Comment 1:	I just want to thank those on staff at the City. Thank you for all of your amazing & hard work & especially for all of the extra hours you put in on this project. Please put me on the response to comment list.
Response 1:	Comment noted.
Comment 2:	Thank you for the opportunity to review the Lilydale Regional Park Amended Master Plan EAW. MnDOT has reviewed the EAW and finds it to be acceptable. If you have any questions, please feel free to contact me.
Response 2:	Comment noted.