

UNIVERSITY OF ST. THOMAS MULTIPURPOSE ARENA

Findings of Fact

December 2024

Prepared for:



**SAINT PAUL
MINNESOTA**

Prepared by:

Kimley»»Horn

TABLE OF CONTENTS

Administrative Background.....	1
Findings of Fact	2
Project Description.....	2
Corrections to the EAW Update or Changes to the Project Since the EAW Update was Published.....	2
Agency and Public Comments on the 2024 EAW Update.....	3
Mitigation Plan.....	3
Mitigation.....	4
Conclusions	8

LIST OF APPENDICES

- Appendix A: September 2024 EAW
- Appendix B: Agency Comments
- Appendix C: Public Comments

ADMINISTRATIVE BACKGROUND

The University of St. Thomas (St. Thomas), as the project proposer, has proposed to redevelop an approximately 6 acre site located on the St. Thomas South Campus in Saint Paul, Ramsey County, Minnesota. The Lee and Penny Anderson Arena (Arena) consists of one building that will house a dual-purpose competition venue for the University's hockey and basketball programs, with capacity for approximately 4,000 to 5,500 spectators. The Arena also includes coaching offices, locker rooms, and student athlete support services including sports medicine, strength and conditioning, nutrition, and equipment. Additionally, two basketball practice facilities and an auxiliary ice sheet are included. It is anticipated that the Arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs.

The City of Saint Paul is the Responsible Governmental Unit (RGU) for this project. An Environmental Assessment Worksheet (EAW) was prepared in accordance with Minnesota Rules, part 4410.4300, subpart 34: sports or entertainment facilities and was published for public comment in July 2023 (2023 EAW). A negative declaration on the need for an Environmental Impact Statement (EIS) was issued by the City on September 26, 2023 (2023 Findings of Fact). An appeal of the negative declaration on the need for an EIS was filed in October 2023 with the Minnesota Court of Appeals. An opinion was issued by the Court of Appeals on July 8, 2024 (the COA Opinion), reversing and remanding the City's negative declaration on the need for an EIS. The COA Opinion requires the City to complete an updated EAW. The COA Opinion specifies that the updated EAW should include an analysis of environmental effects associated with the Schoenecker Center, a new academic building that is also located on St. Thomas' South Campus that opened for academic use in February of 2024. The Court of Appeals determined that the Schoenecker Center and the Arena are "phased actions" as defined by Minnesota Rules. The COA Opinion also noted that the updated EAW should provide mitigation measures that are "specific, targeted, and certain" and include an analysis of greenhouse gas emissions related to spectator vehicles.

An EAW Update (2024 EAW Update) has been prepared in accordance with Minnesota Rules Chapter 4410 to include the additional analysis noted in the COA Opinion: the Schoenecker Center, greenhouse gas emissions related to spectator vehicles, and more specific, targeted, and certain mitigation recommendations (see Appendix A). In addition to the analysis noted in the COA Opinion, the 2024 EAW Update also includes an analysis of the environmental effects of two projects that are in the same geographic area as the Arena and are proposed to commence construction in the next year: an addition to the existing Owens Science Hall that will house an expansion of the Center for Microgrid Research on St. Thomas' campus (Microgrid Project) and a parking lot proposed by a neighboring landowner, the Saint Paul Seminary (SPS Parking Lot). Construction of the Arena began during the Court of Appeals process and the three pre-existing buildings on site have now been demolished, as have six pre-existing surface parking lots.

The 2024 EAW Update was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comment to the required distribution list. A notice of availability was published in the *EQB Monitor* on October 8, 2024. This notice included a description of the project, information on where copies of the 2024 EAW Update were available, and invited the public to provide comments.

The 2024 EAW Update was made available electronically on the City of Saint Paul’s website at <https://www.stpaul.gov/departments/planning-and-economic-development/planning/current-activities/university-st-thomas>. Notice of availability was distributed through the City of Saint Paul’s Electronic Notification System (ENS) and published in the Pioneer Press.

The 2024 EAW Update comment period extended from October 8, 2024, to November 7, 2024. Written comments were received from two agencies. Forty-eight public comments were also received. All comments were considered in determining the potential for significant potential environmental impacts.

Based on the information in the record, which is composed of the 2024 EAW Update for the proposed project, the comments submitted during the public comment period, the responses to comments, and other supporting documents, the City of Saint Paul makes the following Findings of Fact and Conclusions.

FINDINGS OF FACT

Project Description

The proposed University of St. Thomas Lee and Penny Anderson Arena will be a redevelopment of an approximately 6-acre site located on the St. Thomas South Campus in Saint Paul, Minnesota.

In addition to the project, development on and near the St. Thomas South Campus was analyzed in the EAW Update, including the completed Schoenecker Center, the proposed expansion of the Center for Microgrid Research (Microgrid Project), and the proposed St. Paul Seminary Parking Lot (SPS Parking Lot). The total redevelopment area analyzed is approximately 11.7 acres.

Corrections to the EAW Update or Changes to the Project Since the EAW Update was Published

A number of public comments referenced the potential for other campus events to occur at the same time as high attendance events at the Arena, compounding potential traffic and parking impacts. One recommended parking and traffic mitigation measure outlined in the 2024 EAW Update Transportation Analysis is that St. Thomas avoid other on-campus events that would attract outside nonstudent/staff visitors (who require on-site parking) during sporting events with anticipated attendances of 2,100 or greater. This measure was recommended to reduce compounding impacts of multiple events. As part of responding to comments with respect to other events, the author of the Transportation Study provided further clarification. For purposes of the Traffic Study, “other on-campus events that would attract outside nonstudent/staff visitors” was assumed to be an event with approximately 75 or more outside visitors. In addition, the 2,100 threshold for Arena events is recommended for weeknight events. Because parking supply is higher on the weekends, it would be reasonable to use a higher threshold for Arena events, such as 3,000, on weekends.

The July 2024 COA Opinion did not specifically address any matters related to the proposed SPS Parking Lot, and that project was not addressed in the 2023 EAW. However, the COA did require further consideration of a nearby development considered to be a “phased action”, specifically citing the nearby Schoenecker Center. In the spirit of the COA Opinion, the City of Saint Paul opted to include the SPS Parking Lot for consideration of

“cumulative effects” given the proximity and overlapping timing of the project to the separate Arena project. The City does not consider the proposed SPS Parking Lot a “connected action” as defined under Minnesota Rules 4410 relative to the Arena, and the SPS Parking Lot should not have been characterized as such in the 2024 EAW Update. The SPS Parking Lot project itself does not trigger any requirements for environmental review under Minnesota law. This classification was done in error and without prior communication to SPS. Additionally, SPS Parking Lot restrictions on permitting under Minnesota Rules 4410 do not apply and any references to permit requirements regarding the SPS Parking Lot were included in Section (or “Item”) 9 of the 2024 EAW Update in error.

Agency and Public Comments on the 2024 EAW Update

During the comment period, the City of Saint Paul received written comments from the U.S. Army Corps of Engineers (USACE) and Minnesota Department of Natural Resources. The City of Saint Paul received an additional 48 written comments from the public.

Consistent with state environmental rules, responses have been prepared for all substantive comments received during the comment period. The tables included in Appendix B of this Findings of Fact document contain response to agency and public comments. Copies of the agency and public comments received are included in Appendix C and D, respectively.

Mitigation Plan

A number of measures have already been implemented through the project design or inclusion in the Project’s Site Plan Approval to prevent or minimize potential environmental impacts. Mitigation measures for traffic and parking will be required as a condition of the Certificate of Occupancy, as set forth below, to ensure that potential impacts will not rise to the level of significance and to address concerns raised by the community through the public comment period.

Based on the record, the City of Saint Paul as RGU has determined that based on the criteria provided:

The proposed Arena will have a maximum capacity of approximately 5,500 spectator attendees for basketball events and non-athletic events, and approximately 4,000 spectator attendees for hockey events. The 2024 EAW Update estimated both average and maximum attendances for sporting events, also categorizing spectator attendance by attendance ranges spanning from less than 1,000 attendees up to 5,500 attendees at different levels. This analysis was based on observed attendance at similar facilities in the Division 1 NCAA athletic conference that St. Thomas is a member of and a known change in athletic conference for men’s hockey during the 2026-27 season. Average attendance calculations varied by sport, ranging from 550 for women’s hockey to 3,600 for men’s hockey, and attendance for max events varied by sport, ranging from 3,000 for women’s basketball and 5,500 for men’s basketball. Parking impacts were evaluated based on projected event frequency at average and maximum capacity events for each sport as well as for attendance ranges at different intervals. Approximately 12 of the 66 anticipated sporting events are expected to have a parking deficit with no mitigation, which decreases to 3 of the 66 events if the SPS Parking Lot project is constructed because the St. Thomas lots will no longer be used by seminarians, freeing up parking on St. Thomas’ campus

for events. Attendance thresholds at which parking can be accommodated on/near campus without mitigation are estimated to be approximately 2,575 spectator attendees for Thursday nights, 3,870 for Friday nights, and 4,395 for Saturday nights. In addition to sporting events, the Arena is proposed to host other university events of unknown frequency and exact nature of the events, which is described in the transportation analysis.

Potential traffic impacts were evaluated for a maximum attendance event. The 2024 EAW Update included an updated analysis documenting the “level of service” (LOS) ratings and maximum queues expected for the max attendance scenario both with and without event traffic management strategies, which are often documented within an event management plan. Event management plans help facilitate vehicular traffic flow and enhance safety for pedestrians and are further described in the transportation analysis. The LOS ratings indicate that, without mitigation, there would be notable impacts to traffic in the immediate vicinity of the proposed Arena, particularly at the intersections of Cretin Avenue with Grand and Summit Avenues, which are both signalized. The EAW also notes that left-turn movements onto Cretin at unsignalized intersections would be particularly impaired for short durations (15 to 30 minutes) before and after an event. The Site Plan Approval requires St. Thomas to undertake a number of infrastructure improvements and requires an Event Management Plan. Implementation of these mitigation measures, along with the additional requirements below, are expected to mitigate traffic and parking impacts.

Mitigation

Based on the nature and extent of the potential traffic and parking impacts, and building on the strategies identified in the EAW and infrastructure and management strategies required through the Site Plan Review process that will mitigate impacts associated with the operation of the Arena, the following mitigation measures will be implemented and enforced through the issuance of a Certificate of Occupancy by the City. The City’s regulatory authority over the mitigation measures is ongoing, allowing the City to revoke the Certificate of Occupancy if the University is not complying with the required mitigation efforts.

The City finds that implementing and enforcing the mitigation measures through the Certificate of Occupancy will ensure that the mitigation measures are subject to ongoing regulatory authority as set forth in Minn. R. 4410.1700, subp. 7.C. Pursuant to the City’s Legislative Code, a Certificate of Occupancy constitutes a certification of zoning compliance. St. Paul Leg. Code § 61.102. Failure to comply with any condition of a zoning determination or other zoning approval may result in revocation or modification of such approval. St. Paul Leg. Code § 61.108. Further, for any use that requires a site plan, a certificate of occupancy shall only be renewed if the use is in conformance with the site plan and all conditions of the Code. St. Paul Leg. Code § 61.402(f). The Site Plan Approval contains certain requirements that the City has determined will mitigate traffic and parking impacts of the Project once the Project is operational.

Please note the mandatory language (i.e., “will”) for strategies. The City finds that the following mitigation measures are expected to effectively mitigate the potential traffic, parking and other transportation-related impacts of the Project.

1. Event Traffic Management: As a condition of its site plan approval and as a condition of receiving and maintaining a certificate of occupancy, St. Thomas is required to develop, in consultation with Saint

Paul Police Department, Public Works Department, and the Office of the City Attorney and implement an Event Management Plan (EMP), including strategies for traffic control management, parking and pedestrian safety. The plan will tie specific strategies to event size and timing. In addition to collegiate hockey and basketball, the plan will also cover any other planned/potential events at the Multipurpose Arena. EMPs are regularly used to effectively manage parking, traffic and pedestrian safety and an EMP for the Arena can reasonably be expected to manage the identifiable parking congestion and traffic issues that may result from Arena operations. As a part of the EMP, St. Thomas is required to monitor event attendance, traffic, and parking, and shall provide such data to the City upon request. At a minimum, such data shall be provided annually to the City of St. Paul for no less than five operational years after the Multipurpose Arena is occupied. An EMP is considered a living document and will be modified as needed based on the attendance, traffic, and parking data gathered during the monitoring period. Modifications will follow the processes below. Following the conclusion of the initial monitoring period, the Zoning Administrator will determine whether to extend the monitoring and reporting period.

2. The initial EMP will include, at a minimum, the following components:
 - a. Pre-Paid Event Tickets & Parking Assignment: St. Thomas will use and further encourage online ticket purchases with options for designated parking passes or alternative transportation information. This minimizes the need for attendees to circle campus lots and serves as a platform to inform users about potential alternative transportation options and incentives such as free transit, discounted rideshare, and alternative shuttle services, which are discussed below.
 - b. Permit Modifications & Parking Ramp Restrictions: St. Thomas will implement time-of-day restrictions and/or “no park” days at visitor parking facilities for events anticipated to exceed their available parking supply to ensure event patrons have reserved spaces in their designated ramps. This strategy is expected to increase parking availability by 150 to 405 spaces, depending on the night. The number of parking facilities cleared will be dependent on the expected attendance at each event and will be further defined as part of the EMP. This strategy has been used successfully by St. Thomas in the past for athletic and other campus events. To avoid shifting students/staff parking to the public streets, the strategy St. Thomas be paired with early communications and clear notification prior to enforcing the event parking restrictions in St. Thomas facilities. One of the visitor ramps is expected to remain available for commuting students/staff under all event scenarios, ensuring at least one parking option is available to non-event visitors while event activities are underway.
 - c. Free Transit Passes: St. Thomas will work with Metro Transit to offer free transit pass options with the purchase of event tickets, which is estimated to reduce demand by 10 to 30 vehicles. Preliminary discussions with Metro Transit have indicated that distributing free pass options

through the online ticketing system will be feasible. St. Thomas is required to include details on the implementation of this program in the Event Traffic Management Plan.

- d. Discounted Rideshare: St. Thomas will pursue a partnership with a rideshare company to provide discounted rates for ticket holders, which is estimated to reduce demand by 25 to 50 vehicles. Preliminary discussions with two rideshare companies have indicated that discounted rates can be easily implemented. St. Thomas is required to include details on the implementation of this program in the Event Traffic Management Plan.
- e. Restaurant/Bar Shuttle Service: St. Thomas will pursue collaborations with local establishments to offer shuttle services, which is estimated to reduce demand by 25 to 75 vehicles. St. Thomas has had preliminary discussions with potential locations who have an interest in establishing a partnership. St. Thomas is required to include details on the implementation of this program in the EMP.
- f. Avoid/Minimize Other On-Campus Events: St. Thomas will implement policies to avoid or minimize the number of other on-campus events that would attract outside (non-student/staff visitors) during sporting events at the Arena. St. Thomas is required to include implementation details in the EMP, which, for the first year of Arena operations, shall limit on-campus events that would attract 75 or more outside non-student/staff visitors (who require onsite parking) during sporting events at the Arena with anticipated attendances greater than 2,100 (weeknights) or 3,000 (weekends). The attendance level at which this measure is triggered may increase or decrease year-to-year based on data collected, operational changes or changes to overall campus parking infrastructure. This strategy will reduce compounding traffic and parking impacts.
- g. St. Thomas will notify event patrons that they may be ticketed and towed if they park illegally on residential streets. This notification will be included in the online pre-paid ticketing and parking assignment system, and the University will also explore additional strategies to further inform event attendees. St. Thomas is required to include details on implementation in the EMP. This strategy is expected to reduce illegal parking on residential streets.
- h. St. Thomas will designate an event transportation coordinator to oversee and manage the EMP, as well as serve as the primary point of contact for other agencies and the public. St. Thomas is required to include details on implementation in the EMP. This strategy was suggested in a public comment and is designed to ensure successful implementation of the EMP.
- i. Off-street Parking and Shuttle Services: St. Thomas will partner with offsite parking lot owner(s) and shuttle provider(s) to provide off-site parking and shuttle services for Arena events with anticipated attendance above 4,350 on Thursday/Weeknight, 4,775 on Friday, and 5,200 on Saturday evenings to offset the parking deficits that are expected to occur after the mitigation measures above are provided. St. Thomas has had preliminary discussions with

Allianz Field to utilize their parking lot for shuttle services, which has sufficient available parking to accommodate the deficits. St. Thomas is required to include details on the implementation of this program in the EMP. This strategy will provide enough off-site parking spaces to accommodate the potential parking deficit on campus for large events.

- j. Traffic Management and Pedestrian Safety: St. Thomas will provide traffic control officers for large events and designated pedestrian routes. St. Thomas is required to include details on the implementation of these measures in the EMP. This strategy will improve pedestrian and traffic safety and reduce traffic impacts.
 - k. The above components of the EMP (a-j) may be modified by the Zoning Administrator following consultation with St. Thomas and appropriate City staff, as well as notification to the Union Park and Macalester Groveland Neighborhood District Councils. Such modification may be made when a mitigation component is unnecessary or ineffective in its current form, considering real-world circumstances, and the remaining strategies alone or alternate strategies, will result in effective mitigation.
3. St. Thomas, in consultation with Saint Paul Police Department and/or Public Works Department, shall monitor the efficacy of the EMP and may make changes to non-required components (components of the EMP not specifically listed in part 2(a)-(j) above) and to the particular implementation details of all components to better manage traffic and parking.
 4. For the first five years of Arena operations, St. Thomas shall report to the Zoning Administrator by June 30th of each year on: (1) event attendance in the prior year, and (2) efficacy and/or deficiencies of the mitigation measures included in the EMP.
 5. For the first five years of Arena operations, St. Thomas will not sell standing room tickets that cause spectator attendance to exceed the spectator attendance thresholds analyzed in the 2024 EAW (5,500 for basketball and other events, approximately 4,000 for hockey). After the first five years of Arena operations, the Zoning Administrator has authority to authorize additional sales of standing room only tickets based on data related to the efficacy of mitigation measures, changes to overall campus parking infrastructure or other relevant factors.
 6. St. Thomas will continue to operate a Snow and Ice Management Plan within their property in order to avoid overuse of ice melt products and enroll grounds crew members to attend the MPCA's Smart Salting program, or an equivalent to mitigate downstream runoff effects of public waters.
 7. St. Thomas will provide a parking spot for visiting team buses during events held at the Arena along with an indoor campus location for the bus drivers to wait during the event to reduce idling buses contributing to greenhouse gas emissions.

In addition to the mitigation above, the City will enforce parking and traffic regulations related to any potential impacts from the project. The City's Traffic Engineering Department will review, accept, and implement the signal timing plans developed for events.

Conclusions

1. All requirements for environmental review of the proposed project have been met.
2. The 2023 EAW, the 2024 EAW Update and the permit development processes related to the project have generated information that is adequate to determine whether the project has the potential for significant environmental effects.
3. St. Thomas has undertaken appropriate efforts to minimize environmental impacts of the project. Areas where potential environmental effects have been identified have been addressed through project design and the requirements of site plan approval and have been or will be coordinated with appropriate governmental agencies or units, including the City of Saint Paul. The project has been and will be subject to regulatory authority which will be sufficient to implement any mitigation necessary to address potential environmental effects from project construction, operation or maintenance.
4. Potential operational impacts related to parking and traffic are limited-in-time, reversable, and will be managed through an EMP. An EMP that meets the requirements set forth in the Mitigation section above is required as a condition of a certificate of occupancy. An EMP was also required as part of the final site plan approval.
5. Based on the criteria in Minnesota Rules, part 4410.1700, the project does not have the potential for significant environmental effects, and an environmental impact statement is not required for the proposed project.

Signature

Michael Newton

Date

12/10/24

Title

Director, Department of Planning and Economic Development

Appendix A

September 2024 EAW

University of St. Thomas Multipurpose Arena

Environmental Assessment Worksheet Update

September 2024

Prepared for:



SAINT PAUL
MINNESOTA

Prepared by:

Kimley»»Horn

Table of Contents

Introduction.....	1
1. Project Title	4
2. Proposer.....	4
3. RGU	4
4. Reason for EAW Preparation	5
5. Project Location.....	5
6. Project Description.....	5
7. Climate Adaption and Resilience.....	9
8. Cover Types.....	17
9. Permits and Approvals Required.....	18
10. Land Use	22
11. Geology, Soils, and Topography/Landforms.....	25
12. Water Resources.....	28
13. Contamination/Hazardous Materials/Wastes.....	36
14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features).....	39
15. Historic Properties.....	44
16. Visual.....	46
17. Air.....	47
18. Greenhouse Gas (GHG) Emissions/Carbon Footprint.....	48
19. Noise.....	52
20. Transportation.....	53
21. Cumulative Potential Effects	62
22. Other Potential Environmental Effects.....	63
RGU Certification	64

List of Tables

Table 1: Project Magnitude.....	8
Table 2: Climate Considerations and Adaptations.....	12
Table 3: Cover Types.....	17
Table 4: Green Infrastructure.....	17
Table 5: Trees.....	17
Table 6: Permits and Approvals Required	18
Table 7: What's in My Neighborhood Sites	36
Table 8: State-Listed Threatened and Endangered Species.....	41
Table 9: Historic Properties within 500 feet of the 2023 EAW Project Site.....	45
Table 10: Existing Operational Emissions	49
Table 11: Construction Emissions	49
Table 12: Proposed Operational Emissions.....	50
Table 13: Event Parking Demand Analysis by Event Type (No Mitigation).....	56
Table 14: Event Parking Demand Analysis by Attendance (No Mitigation).....	57
Table 15: LOS Summary.....	58
Table 16: Event Parking Demand Analysis for Maximum Events (With Mitigation).....	61

Table 17: Attendance Thresholds (With Mitigation).....61

List of Figures

Figure 1: County Map.....66
 Figure 2: USGS Map67
 Figure 3: Existing Conditions.....68
 Figure 4: Existing Land Use.....69
 Figure 5: Existing Zoning.....70
 Figure 6: Zoning Overlay Districts.....71
 Figure 7: Water Resources.....72
 Figure 8: What’s In My Neighborhood Sites Within 200 feet of the Project Site73
 Figure 9: Historic Resources Within 500 feet of the Project Site.....74

List of Appendices

Appendix A: September 2024 Site Plans (2020, 2023, 2025)
 Appendix B: September 2024 Greenhouse Gas (GHG) Analysis
 Appendix C: September 2024 Greenhouse Gas Vehicle Emissions
 Appendix D: September 2024 EAW Update Transportation Analysis Addendum
 Appendix E: September 2023 Findings of Fact
 Appendix A. June 2023 EAW
 Appendix A. Site Plan
 Appendix B. Agency Correspondence
 Appendix C. Greenhouse Gas (GHG) Analysis
 Appendix D. Traffic Impact Analysis
 Appendix B. Agency Comments
 Appendix C. Public Comments
 Appendix D. Updated Site Plan

Introduction

The University of St. Thomas (UST), as the project proposer, has proposed to redevelop an approximately 6-acre site located on the UST South Campus in Saint Paul, Ramsey County, Minnesota. The Lee and Penny Anderson Arena (Arena) consists of one building that will house a dual-purpose competition venue for the University’s hockey and basketball programs, with capacity for approximately 4,000 to 5,500 spectators. The Arena also includes coaching offices, locker rooms, and student athlete support services including sports medicine, strength and conditioning, nutrition, and equipment. Additionally, two basketball practice facilities and an auxiliary ice sheet are included. It is anticipated that the Arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs.

The City of Saint Paul (City) is the Responsible Governmental Unit (RGU). An Environmental Assessment Worksheet (EAW) was prepared in accordance with Minnesota Rules, part 4410.4300, subpart 34: sports or entertainment facilities and was published for public comment in July 2023 (2023 EAW). A negative declaration on the need for an Environmental Impact Statement (EIS) was issued by the City on September 26, 2023 (2023 Findings of Fact).

An appeal of the negative declaration on the need for an EIS was filed in October 2023 with the Minnesota Court of Appeals. An opinion was issued by the Court of Appeals on July 8, 2024 (the COA Opinion), reversing and remanding the City’s negative declaration on the need for an EIS. The COA Opinion requires the City to complete an updated EAW. The COA Opinion specifies that the updated EAW (2024 EAW Update) should include an analysis of environmental effects associated with the Schoenecker Center, a new academic building that is also located on UST’s South Campus that opened for academic use in February of 2024. The Court of Appeals determined that the Schoenecker Center and the Arena are “phased actions” as defined by Minnesota Rules. The COA Opinion also noted that the EAW should provide mitigation measures that are “specific, targeted and certain” and include an analysis of greenhouse gas emissions related to spectator vehicles.

The City, in coordination with UST, is providing this 2024 EAW Update to include the additional analysis noted in the COA Opinion: the Schoenecker Center and greenhouse gas emissions related to spectator vehicles. The analysis of greenhouse gas emissions related to spectator vehicles can be found in the EAW under Item 18.b.iii.

In addition to the analysis noted in the COA Opinion, the 2024 EAW Update also includes an analysis of the environmental effects of two projects that are in the same geographic area as the Arena and are proposed to commence construction in the next year: an addition to the existing Owens Science Hall that will house an expansion of the Center for Microgrid Research on UST’s campus (Microgrid Project) and a parking lot proposed by a neighboring landowner, the Saint Paul Seminary (SPS Parking Lot).

First, facilities for microgrid research were included as part of the 2023 EAW as the expansion of these facilities were initially intended to be housed in the Arena. These plans changed and clarification was made in the 2023 Findings of Fact through the public comment responses that the facilities for microgrid research were pulled out of the Arena project scope. As now proposed, the expansion of the microgrid research facilities will be located in Owens Science Hall, which is located just north and east of the Arena. The Microgrid Project was submitted to the City for site plan approval in July 2024, and if approved, is anticipated to be completed in summer of 2025 in advance of the Arena's opening.

Second, a neighboring landowner, the Saint Paul Seminary (SPS), is proposing to construct a surface parking lot on SPS land, located to the west of the UST property.¹ The SPS Parking Lot project was submitted to the City of St. Paul for site plan approval in July 2024, and if approved, is anticipated to begin construction in late 2024 or early 2025 and to be completed in advance of the Arena opening.

The 2024 EAW Update also includes an updated Transportation Analysis Addendum (September 2024 EAW Update Transportation Analysis Addendum). This addendum includes an analysis of the Schoenecker Center, Microgrid Project, and SPS Parking Lot projects. The addendum also includes technical clarifications or changes in Arena project conditions from the 2023 Traffic Impact Analysis (see Appendix D of the 2023 EAW included in Appendix E) such as the removal of the Anderson Parking Facility (APF) skyway connection, updated parking count information, a change in men's hockey conference for the 2026/27 season, and refined considerations regarding mitigation strategies.

Since the publication of the negative declaration on the need for an EIS on September 26, 2023, the size of the proposed Arena has decreased slightly. The total size of the Arena was reduced from 270,000 GSF as listed in the 2023 EAW to approximately 252,000 GSF. The maximum attendances for hockey and basketball events have changed from 4,000 and 5,500 to 4,005⁽²⁾ and 5,324⁽²⁾, respectively. Non-athletic events such as commencements could still be arranged for seating of approximately 5,500 seats, depending on the stage configuration. Seating for 4,523⁽²⁾ could be provided in "end stage" configuration and 5,500⁽²⁾ for a "center stage" configuration. For the purposes this 2024 EAW Update, the proposed size and/or capacity of the Arena used for the 2023

¹ UST and SPS are separate legal entities with distinct non-profit missions and separate boards of trustees. SPS owns the land upon which SPS is seeking to build additional parking. Although UST and SPS are independent of one another, they have entered into an affiliation agreement by which they cooperate in operating the Saint Paul Seminary School of Divinity (SPSSOD), which is a school of UST. SPSSOD offers programs in clergy and lay formation. SPSSOD operations take place both on land owned by UST and land owned by SPS. SPSSOD administrative and faculty offices, a residence for priests and seminarians and the St. Mary's Chapel are located on SPS land. SPSSOD students take classes on UST property and have use of the UST campus on the same basis as other UST students. Many SPSSOD students and some SPSSOD faculty and staff currently park on UST property.

² The seat counts listed are based on the latest Arena design plans dated July 24, 2024 and are subject to change as design continues to advance.

EAW will be used. However, where relevant, the 2024 EAW Update will note potential effects of the decreased project size and/or capacity.

Construction of the Arena began during the Court of Appeals process and the three pre-existing buildings on site have now been demolished, as have six pre-existing surface parking lots.

Environmental Assessment Worksheet

This most recent Environmental Assessment Worksheet (EAW) form and guidance documents are available at the Environmental Quality Board's (EQB's) website at: <https://www.eqb.state.mn.us>. The EAW form provides information about a project that may have the potential for significant environmental effects. Guidance documents provide additional detail and links to resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item or can be addressed collectively under EAW Item 21.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation, and the need for an EIS.

1. Project Title

University of St. Thomas Multipurpose Arena

2. Proposer

Proposer: University of St. Thomas

Contact Person: Anthony Adams, PE

Title: Senior Civil Engineer

Address: 533 South Third Street, Suite 100

City, State, ZIP: Minneapolis, MN 55415

Phone: 612-492-4741

Email: Anthony.Adams@ryancompanies.com

3. RGU

RGU: City of Saint Paul

Contact Person: Josh Williams

Title: Principal Planner

Address: 25 West Fourth Street

City, State, ZIP: Saint Paul, MN 55102

Phone: 651-266-6659

Email: josh.williams@ci.stpaul.mn.us

4. Reason for EAW Preparation

Check one:

Required:

EIS Scoping

Mandatory EAW²

Discretionary:

Citizen petition

RGU discretion

Proposer initiated

If EAW or EIS is mandatory, give EQB rule category subpart number(s) and name(s):

Minnesota Rules, part 4410.4300, subpart 34 (sports or entertainment facilities)

5. Project Location

County: Ramsey

City/Township: Saint Paul

PLS Location (1/4, 1/4, Section, Township, Range): NW 1/4, SE 1/4, Section 5, Township 28N, Range 23W

Watershed (81 major watershed scale): Mississippi River – Twin Cities

GPS Coordinates: 44.9396077, -93.1946973

Tax Parcel Number: 052823420005, 052823420004

At a minimum, attach each of the following to the EAW:

- **County map showing the general location of the project** (see Figure 1)
- **US Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries** (see Figure 2)
- **Site plans showing all significant project and natural features. Pre-construction site plan and post-construction site plan.** (see Figure 2 and Appendix A)
- **List of data sources, models, and other resources (from the Item-by-Item Guidance: *Climate Adaptation and Resilience* or other) used for information about current Minnesota climate trends and how climate change is anticipated to affect the general location of the project during the life of the project (as detailed below in Item 7).**

6. Project Description

- a. **Provide the brief project summary to be published in the *EQB Monitor* (approximately 50 words).**

The proposed University of St. Thomas Lee and Penny Anderson Arena (Arena) will be a redevelopment of an approximately 6-acre site located on the University of St. Thomas (UST) South Campus in Saint Paul, Minnesota. Additional development on and near the UST South Campus has been incorporated into this analysis, including the completed Schoenecker Center, the proposed expansion of the Center for Microgrid Research (Microgrid Project), and the proposed St. Paul Seminary Parking Lot (SPS Parking Lot) for a total redevelopment area of approximately 11.7-acres.

² Updated per Minnesota COA Opinion

- b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion, include a description of the existing facility. Emphasize 1) construction and operation methods and features that will cause physical manipulation of the environment or will produce wastes; 2) modifications to existing equipment or industrial processes; 3) significant demolition, removal, or remodeling of existing structures; and 4) timing and duration of construction activities.**

The 2024 EAW Update covers approximately 11.7 acres located on the University of St. Thomas South Campus and St. Paul Seminary properties, bounded to the north by Summit Avenue, the east by Cretin Avenue, the south by Goodrich Avenue, and the west by Mississippi River Boulevard South. See Figure 1 and Figure 2 for project location and Figure 3 for existing site conditions.

The proposed Arena includes one building to house a dual-purpose competition venue for the University's hockey and basketball programs with capacity for approximately 4,000 to 5,500 spectators. The Arena also includes coaching offices, locker rooms, and student athlete support services including sports medicine, strength and conditioning, nutrition, and equipment. Additionally, two basketball practice facilities and an auxiliary ice sheet are included. It is anticipated that the Arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs. Existing utility tunnels connect the Arena to nearby facilities. The new facility will be designed to meet a LEED Silver rating³.

Three pre-existing buildings on the site have been demolished to accommodate the Arena redevelopment: Cretin Hall, Service Center, and McCarthy Gymnasium. Pre-existing surface parking lots have been demolished to accommodate the redevelopment: Lot N, Lot P1 (partial demolition), Lot V, Lot X, Lot Y (14 spaces to remain after construction), and a portion of Lot O (46 spaces to remain after reconstruction). Utility relocations and extensions have been completed to accommodate facility construction. No onsite parking is expected to be constructed in the Arena redevelopment area, except the stalls noted as reconstructed above, as existing parking elsewhere within the University campus is to be used. Vehicular access to the facility includes spectator access from Cretin Ave through the private extension of Grand Ave, service vehicle access from Cretin Ave through a new access point near the southeast portion of the project area, and staff vehicle access through the existing western access from Summit Ave.

Construction methods are typical of new buildings on the UST campus and include poured in place concrete spread footing and concrete foundation walls with limited drilled piers adjacent to existing buildings. Arena construction began in spring 2024 and is anticipated to be complete by fall 2025.

To better understand the environmental effects of the Arena, the 2024 EAW Update also analyzes the environmental effects associated with the Schoenecker Center, a University of St.

³ The USGBC's LEED green building program provides a framework for improving building performance and the responsible use of energy, water, and material resources through design, construction, and ongoing operations. Achieving certification demonstrates a project's verified implementation of these strategies and commitment to supporting a healthier, more sustainable community.

Thomas LEED Gold-certified building north of the Arena, which has been constructed and is now the University's central home for science, technology, engineering, arts, and math (STEAM) education. The Schoenecker Center was constructed to address a space deficit on campus to accommodate existing academic programs and included the construction of the South Campus Quadrangle outdoor plaza and greenspace area, two loading areas accessed off the western Summit Ave access drive, utility tunnels to service various buildings on South Campus, an art gallery, and choral and instrumental rehearsal and performance spaces. Construction of the Schoenecker Center was complete in 2024 and the building has since been opened. One building, Loras Hall, was demolished to construct the Schoenecker Center along with two surface parking lots in Lot M and Lot P1 (partial demolition). Construction methods were similar to those of typical new buildings on the UST campus as mentioned in the Arena description above.

The 2024 EAW Update also analyzes the environmental effects associated with an expansion of the Center for Microgrid Research (Microgrid Project) through a building addition to Owens Science Hall. The Microgrid Project is proposed to further expand the University's microgrid testing and research capabilities that exist on campus and will include mechanical equipment such as three 500 kW generators, an energy storage system, and a load bank. The Microgrid Project reconstructs the existing Owens Science Hall loading dock on the first level and provides a new greenhouse for the Biology department on the second level.

Modifications to the existing curb and sidewalk on the north side of the private Grand Ave are anticipated. Construction of the Microgrid Project is anticipated to begin in 2024 and be complete prior to the Arena opening. A portion of Owens Science Hall and an existing greenhouse will be demolished to construct the Microgrid Project. Construction methods are proposed similar to those of typical new buildings on the UST campus as mentioned in the Arena's description above.

The St. Paul Seminary (SPS), located north and west of the UST South Campus, intends to construct a surface parking lot along Mississippi River Boulevard (SPS Parking Lot). The environmental effects of this project are analyzed in the 2024 EAW Update. The SPS Parking Lot is proposed by a different entity (the St. Paul Seminary) and on a different property (also owned by the St. Paul Seminary) than the UST projects listed above. SPS has proposed to construct approximately 73 surface parking stalls through a new surface parking lot along Mississippi River Boulevard and through parking along the existing SPS access drive from Mississippi River Boulevard. Construction of the SPS Parking Lot is anticipated to begin in late 2024 or early 2025 and is anticipated to be complete prior to the Arena opening. Demolition of some existing curb and asphalt are anticipated. Construction methods include the typical methods of pouring curb and pavement materials.

The site plans are included in Appendix A showing the site conditions prior to the demolition of Loras Hall (2020), the site conditions prior to the demolition of Cretin Hall, Service Center, and McCarthy Gymnasium (2023), and the proposed site conditions anticipated after completion of the projects discussed above (2025).

c. Project magnitude

Table 1: Project Magnitude

Measure	Magnitude
Total Project Acreage	11.7 acres
Institutional Building Area (square feet)	252,000 square feet (Arena) 131,000 square feet (Schoenecker Center) 10,000 square feet (Microgrid Project)
Structure Height(s) ⁴	<p>Arena 58 feet 3 inches (Main Arena) 66 feet (Basketball Practice Facilities) 74 feet 8 inches (Raised parapets for stair/elevator overruns and/or mechanical screening)</p> <p>Schoenecker Center 58 feet (Top of flat roof) 73 feet 10 inches (Top of sloped mechanical screening) 77 feet (Raised parapets for stair/elevator overruns and/or mechanical screening)</p> <p>Microgrid Project 29 feet (Top of second story) 31 feet 4 inches (Raised parapets stair/elevator overruns and/or mechanical screening) 37 feet (Top of Greenhouse)</p>

d. Explain the project purpose. If the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

The purpose of this project is to redevelop a portion of the University of St. Thomas South Campus into an Arena to house a competition venue for the University’s hockey and basketball programs to meet Division I athletic program expectations.

The Schoenecker Center is an academic building constructed to address a space deficit on campus and to be the University’s central home for STEAM education.

The Microgrid Project is an addition to an academic building to expand the University’s Center for Microgrid Research.

The SPS Parking Lot is to expand the parking available for the St. Paul Seminary.

⁴ Chapter 60 of the Saint Paul Legislative Code, part of Title VIII, the Zoning Code, describes methods for measuring building height based on roof type and for flat roofs, has been interpreted to exclude rooftop equipment, stairwells, elevator overruns, etc., as they generally occupy a small portion of the roof area.

- e. **Are future stages of this development, including development on any other property, planned or likely to happen?** Yes No

If yes, briefly describe future stages, relationship to present project, timeline, and plans for environmental review.

The Microgrid Project is likely to start construction in 2024 and be completed in 2025. The use of the Microgrid Project does not have any direct relationship to the use of the Arena as they are proposed to address two different university needs. The Microgrid Project is not subject to environmental review under Minnesota Rules, part 4410.4300, as a standalone project; however, the 2024 EAW Update includes analysis of the Microgrid Project.

The SPS Parking Lot is likely to start construction in 2024 and be completed in 2025. The intended use of the SPS Parking Lot is to provide parking for seminarians and priests who live on SPS property. The Arena project would benefit from the SPS Parking Lot, if approved and constructed, as the SPS Parking Lot provides additional parking supply to St. Paul Seminary School of Divinity students who would otherwise park in/on UST parking facilities. The SPS Parking Lot is not subject to environmental review under Minnesota Rules, part 4410.4300, as a standalone project; however, the 2024 EAW Update includes analysis of the SPS Parking Lot.

The Anderson Parking Facility is an existing parking ramp, constructed in 2008, that was originally designed for a future expansion of two additional floors. The expansion is discussed as a potential improvement in the Traffic Impact Analysis (Appendix D) of the 2023 EAW (2023 EAW is included as Appendix A of the September 2023 Findings of Fact document, which is Appendix E of the September 2024 EAW Update); however, it is not currently planned or funded at this time. Due to the uncertainty as to any future expansion of the Anderson Parking Facility, this potential future expansion is not analyzed within the 2024 EAW Update. Any future expansion of the Anderson Parking Facility would not require standalone environmental review.

- f. **Is this project a subsequent stage of an earlier project?** Yes No

If yes, briefly describe the past development, timeline, and past environmental review.

The Schoenecker Center was completed in 2024 and located directly to the north of the Arena. An EAW was not required or completed for that project prior to completion, but environmental factors were considered in the site plan review process and the project obtained the appropriate permits and approvals for construction. Environmental effects of the Schoenecker Center are considered in this 2024 EAW Update.

7. Climate Adaption and Resilience

- a. **Describe the climate trends in the general location of the project (see guidance: *Climate Adaptation and Resilience*) and how climate change is anticipated to affect that location during the life of the project.**

Trends in temperature, precipitation, flood risk, and cooling degree days are described below for the general project location. Some of the climate projections summarized below use shared socioeconomic pathways (SSPs) or Representative Concentration Pathways (RCPs), which are greenhouse gas concentration scenarios used by the Intergovernmental Panel on

Climate Change. SSP 245 and RCP 4.5 are intermediate scenarios in which emissions decline after peaking around 2040, and SSP 370 and RCP 8.5 are high-emissions scenarios in which emissions continue to rise through the century.⁵

Temperature

The Minnesota Climate Explorer was used in the 2023 EAW to describe temperature trends. In June 2024, the EQB issued updated EAW guidance which included the use of the Minnesota Climate Mapping and Analysis Tool (CliMAT)⁶ for analysis of temperature trends and was used in this 2024 EAW Update. According to the Minnesota CliMAT, the annual daily average temperature in the project site from 1995 to 2014 was 56.9°F. The annual daily average temperature in the project site is projected to increase to 60.4°F from 2040 to 2059 under an intermediate emissions pathway (SSP 245). In 2080-2099, annual daily average temperature is projected to further increase to 63.3°F and 65.6°F under an intermediate (SSP 245) and high emissions pathway (SSP 370), respectively.

Urban Heat Island

Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council's Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat.⁷

Precipitation

The Minnesota Climate Explorer was used in the 2023 EAW to describe precipitation trends. The EQB's June 2024 updated EAW guidance included the use of the EPA Climate Resilience Evaluation and Awareness Tool (CREAT) Climate Change Scenarios Projection Map which was used in the 2024 EAW Update. According to the EPA CREAT Climate Change Scenarios Projection Map, there is a projected 2.9% to 13.7% increase in 100-year storm intensity by 2035 and a projected 5.6% to 26.6% increase in 100-year storm intensity by 2060.⁸

Localized Flood Risk

The Metropolitan Council's Localized Flood Map Screening Tool⁹ identifies localized flood hazards, referred to as Bluespots, which are broken into categories based on potential flood water depth. This tool shows several Bluespots within the project site. Multiple Primary and Shallow Bluespots are mapped in the Arena and Microgrid Project portions of the project

⁵ Climate Explorer Metadata. Available at <https://www.dnr.state.mn.us/climate/climate-explorer-metadata.html>.

⁶ Minnesota CliMAT. University of Minnesota. Available at https://app.climate.umn.edu/?output_type=modelVal&scenario=ssp370_2080-2099&model=ensemble&variable=tmax-degF&time_frame=yearly&aoi=none#intro_pane

⁷ Extreme Heat Map Tool. Metropolitan Council. Available at <https://metro council.org/Communities/Planning/Local-Planning-Assistance/CVA/Tools-Resources.aspx>.

⁸ CREAT Climate Change Scenarios Projection Map. US EPA. Available at <https://www.arcgis.com/home/item.html?id=3805293158d54846a29f750d63c6890e>

⁹ Localized Flood Map Screening Tool. Metropolitan Council. Available at <https://metro council.org/Communities/Planning/Local-Planning-Assistance/CVA/Tools-Resources.aspx>.

site, primarily along Grand Avenue and with maximum depths ranging from 0.28 feet to 1.74 feet. Primary, Secondary, Tertiary, and Shallow Bluespots are mapped in the Schoenecker Center portion of the project site, with a maximum depth of 5.15 feet. Shallow Bluespots are mapped in the SPS Parking Lot portion of the project site with a maximum depth of 0.56 feet. Primary Bluespots are the first areas to fill with water and are generally considered higher risk, while Shallow Bluespots are separate, isolated low areas generally considered low risk.

Cooling Degree Days

As defined by the National Weather Service, Cooling degree days, which are often used as a proxy to estimate cooling needs for buildings, can be examined as a baseline and projected exposure indicator under the RCP 4.5 and RCP 8.5 scenarios. Cooling degree days are indexed units, not actual days, which roughly describe the demand to heat or cool a building. Cooling degree days accumulate on days warmer than 65°F when cooling is required. For example, if a weather station recorded an average daily temperature of 78°F, cooling degree days for that station would be 13¹⁰. Cooling degree days are used as a proxy to estimate cooling needs for buildings.

According to Heat Vulnerability in Minnesota,¹¹ the number of cooling degree days in 2019 for Ramsey County was 374. The number of cooling degree days in 2050 for Ramsey County is projected to be 450 and 593 for RCP 4.5 and RCP 8.5, respectively.

- b. For each resource category in the table below, describe the project’s proposed activities and how the project’s design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.**

Climate considerations and adaptations for the proposed project are described in Table 2.

¹⁰ Heat Vulnerability in Minnesota. Available at: https://maps.umn.edu/climatehealthtool/heat_app/

¹¹ Heat Vulnerability in Minnesota. Minnesota Department of Health and the University of Minnesota. Available at https://maps.umn.edu/climatehealthtool/heat_app/.

Table 2: Climate Considerations and Adaptations

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
Project Design	Aspects of the building architecture/materials choices and site design that may negatively affect urban heat island conditions in the area considering changing climate zones, temperature trends, and potential for extended heat waves.	The site is located in an area that experiences urban heat island effect ¹² . Additionally, projected climate trends include increased temperature and precipitation, and increased frequency of freeze/thaw cycles.	<ul style="list-style-type: none"> University of St. Thomas has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff and mitigate for the urban heat island effect. Additionally, these stormwater facilities improve water quality and stormwater runoff in the project vicinity through using minimal turfgrass, which will reduce irrigation needs, reusing stormwater runoff for irrigation purposes, as well as the use of native pollinating perennials, which after 2-3 years generally do not require irrigation. Plantings around the building perimeter are salt-tolerant and tolerant of harsh sites, urban settings. St. Paul Seminary will design landscaping (via shade trees) and stormwater management systems (via pervious pavers) to reduce stormwater runoff and mitigate for the urban heat island effect. For more information on this topic, see Section 12. University of St. Thomas has committed to building LEED-certified facilities that can be designed to use less energy and water. The Arena project is seeking LEED Silver

¹² Defined by the Environmental Protection Agency as “urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun’s heat more than natural landscapes such as forests and water bodies. Urban areas, where these structures are highly concentrated and greenery is limited, become “islands” of higher temperatures relative to outlying areas.” Source: <https://www.epa.gov/heatislands>

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
			<p>accreditation and is seeking a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the building. The Schoenecker Center building received LEED Gold certification.</p> <ul style="list-style-type: none"> • The following measures provide increased reliability and energy efficiency in the Arena to reduce emissions: <ul style="list-style-type: none"> ○ Redundant chiller design and incorporation of glycol into supply loop for all cooling coils will protect from freezing conditions and ensure systems remain operational. ○ Chillers will use next-generation refrigerants with low global warming potential. ○ The boiler system will include n+1 redundancy and freeze protection. ○ The project is being considered for connection to the campus microgrid for back-up power during outages or emergency events. ○ The Arena HVAC-R, lighting, irrigation, and building enclosure systems will also be extensively commissioned by third-party experts to maximum efficiency as designed. ○ These efficiencies reduce heat emitted from the buildings and their HVAC systems and reduces indoor and

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
			<p>outdoor exposure to heat, which is one of the impacts of the heat island effect.¹³</p> <ul style="list-style-type: none"> • The following measures provided increased reliability and energy efficiency in the Schoenecker Center: <ul style="list-style-type: none"> ○ Recycled 80% of waste during construction. ○ Reduced indoor water use by 38% using low-flow fixtures. ○ Reduced 100% of outdoor water use. Rainwater is being collected in a 241,000-gallon underground cistern and reused for irrigation. ○ Building HVAC systems are 27% more efficient than required by ASHRAE 90.1-2010. ○ Use of LED light fixtures with an integrated lighting control system. ○ Exterior fixtures are designed to reduce light pollution. • The Center for Microgrid Research is dedicated to improving the reliability and resiliency of the St. Thomas electric grid. A microgrid is a local version of a traditional electrical grid. It can integrate multiple renewable energy sources into one reliable

¹³ Source: <https://www.sciencedirect.com/science/article/pii/S2666278722000083>

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
			<p>power source. Renewable energy sources can include:</p> <ul style="list-style-type: none"> ○ Solar Photovoltaic (PV) System ○ Simulated Wind Generation ○ Battery Storage ○ Electrical Generators <p>Through the St. Thomas educational programs, research, and partnerships that will take place in the new space, they are building the human and operational capacity to develop distributed energy resources and microgrids, enabling a secure, resilient, and carbon-free electric grid for the 21st century.</p>
Land Use	No critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those with housing occupants who may be insufficiently mobile) are proposed, and the study area has a low risk of localized flooding.	The proposed development is in an area with low flood risk.	University of St. Thomas designed the stormwater management facilities to minimize standing water and reduce the risk of flooding on the Project site. Emergency overflows are designed into both the stormwater management systems and the general site design grading to ensure that during intense rainfall events, the stormwater runoff is directed towards the appropriate location without negatively impacting adjacent buildings or properties. St. Paul Seminary will design the stormwater management facilities to minimize standing water and reduce the risk of flooding on the project site.
Water Resources	Changes in land cover caused by the project could affect site surface hydrology, resulting in	<ul style="list-style-type: none"> • Changes in weather patterns may cause a higher frequency of freeze/thaw cycles, 	<ul style="list-style-type: none"> • The stormwater systems are sized for the additional impervious areas and changes in stormwater requirements. This includes both the water quality treatment of the stormwater

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
	more stormwater runoff and nutrient loading.	<p>resulting in the need for increased salting.</p> <ul style="list-style-type: none"> Chlorides from salting degrade nearby water quality and impact aquatic life. 	<p>runoff and ensuring that the rate at which stormwater runs off the site does not exceed the existing runoff rates.</p> <ul style="list-style-type: none"> The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting which includes pretreatment, removal, de-icing, and clean up. <p>For more information on this topic, see Section 12.</p>
Contamination/ Hazardous Materials/ Wastes	Current Minnesota climate trends and anticipated climate change in the general location of the project may influence the potential environmental effects of generation/use/storage of hazardous waste and materials.	Increased moisture added to waste material or debris, which will in turn increase methane gas production and add to greenhouse gases.	Any hazardous waste products generated or stored within the proposed development will be registered and kept in accordance with Minnesota Pollution Control Agency (MPCA) requirements. For more information on this topic, see Section 13.
Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)	Current Minnesota climate trends and anticipated climate change in the general location of the project may influence local species and suitable habitat.	Suitable habitat for local species may become unsuitable due to land use changes, increased temperature, and increased runoff.	University of St. Thomas has minimized tree removals, replaced trees in landscaped areas, and included non-invasive native plants, resulting in a net gain of suitable habitat for local species including small mammals, insects, and birds. St. Paul Seminary has minimized tree removals by locating their project in an area that would impact the least amount of trees. For more information on this topic, see Section 14.

8. Cover Types

Estimate the acreage of the site with each of the following cover types before and after development.

Estimated cover type acreages within the project site before and after development are provided in Table 3. Green infrastructure and tree canopy acreages before and after site development are provided in Table 4 and Table 5.

Table 3: Cover Types

Cover Type	Before (Acres)	After (Acres)
Wetlands and Shallow Lakes (less than 2 meters deep)	0.0	0.0
Deep Lakes (more than 2 meters deep)	0.0	0.0
Rivers/Streams	0.0	0.0
Wooded/Forest	0.0	0.0
Brush/Grassland	0.0	0.0
Cropland	0.0	0.0
Livestock Rangeland/Pastureland	0.0	0.0
Lawn/Landscaping	5.1	3.5
Green Infrastructure (total from Table 4)	0.0	0.0
Impervious Surface	6.6	8.2
Stormwater Pond (wet sedimentation basin)	0.0	0.0
Other (describe)	0.0	0.0
Total	11.7	11.7

Table 4: Green Infrastructure

Green Infrastructure	Before (Acres)	After (Acres)
Constructed Infiltration Systems (infiltration basins, infiltration trenches, rainwater gardens, bioretention areas without underdrains, swales with impermeable check dams)	0.0	0.0
Constructed Tree Trenches and Tree Boxes	0.0	0.0
Constructed Wetlands	0.0	0.0
Constructed Green Roofs	0.0	0.0
Constructed Permeable Pavements	0.0	0.1
Other (describe)	0.0	0.0
Total	0.0	0.1

Table 5: Trees

Trees	Number
Number of Mature Trees Removed During Development	69 (Arena) 109 (Schoenecker Center) 7 (Microgrid Project) 8 (SPS Parking Lot) 193 (Total)

Trees	Number
Number of New Trees Planted	71 (Arena) 36 (Schoenecker Center) 8 (Microgrid Project) 12 (SPS Parking Lot) 127 (Total)

9. Permits and Approvals Required

List all known local, state, and federal permits, approvals, certifications, and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules Chapter 4410.3100.

Table 6: Permits and Approvals Required

Unit of Government	Type of Application	Status
Federal		
Federal Aviation Administration	Notice of Proposed Construction or Alteration	Received: Arena, Schoenecker Center To be applied for, if applicable: Microgrid Project N/A: SPS Parking Lot
US Army Engineer Research and Development Center Grant	Financial Assistance	Received: Microgrid Project N/A: Arena, Schoenecker Center, SPS Parking Lot
State		
Minnesota Department of Health	Water Main Installation Permit	To be applied for, if applicable
	Well Sealing Notification	Received: Arena N/A: Schoenecker Center, Microgrid Project, SPS Parking Lot
	Food Service Permit	Received: Schoenecker Center To be applied for: Arena N/A: Microgrid Project, SPS Parking Lot
	Pool & Spa Plan Review	To be applied for: Arena N/A: Schoenecker Center, Microgrid Project, SPS Parking Lot
Minnesota Department of Natural Resources	Water Appropriation Permit	To be applied for, if applicable

Unit of Government	Type of Application	Status
Minnesota Pollution Control Agency	Construction Contingency Plan and Response Action Plan Approval	To be applied for, if applicable
	Disturbance Permit	To be applied for, if applicable
	Notice of Intent of Demolition	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot
	National Pollutant Discharge Elimination System Permit	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Sanitary Sewer Extension Permit	To be applied for, if applicable
Minnesota Department of Commerce	Minnesota Renewable Development Account Financial Assistance	Received: Microgrid Project N/A: Arena, Schoenecker Center, SPS Parking Lot
Minnesota Department of Labor and Industry	Elevator Permit	Received: Schoenecker Center To be applied for: Arena N/A: Microgrid Project, SPS Parking Lot
Regional		
Metropolitan Council	Sewer Connection Permit	To be applied for, if applicable
Capitol Region Watershed District	Permit for Stormwater Management	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Permit for Erosion and Sediment Control	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
Local		
Ramsey County	Right-of-Way Permit	To be applied for, if applicable
	Road Access Permit	To be applied for, if applicable
	Demolition Permit and Pre-Demolition Inspection	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot

Unit of Government	Type of Application	Status
City of Saint Paul	Building Permit	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Certificate of Occupancy	Received: Schoenecker Center To be applied for: Arena, Microgrid Project N/A: SPS Parking Lot
	Demolition Permit	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot
	Electrical Permits and Inspections	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot
	Excavation Permit	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Fire Engineering Permits and Inspections	Received: Schoenecker Center To be applied for: Arena, Microgrid Project N/A: SPS Parking Lot
	Grading/Fill Permit and Inspections	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Heritage Preservation Commission Design Review	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Mechanical Permits and Inspections	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot

Unit of Government	Type of Application	Status
	Obstruction Permit	Received: Arena To be applied for, if applicable: Microgrid Project, SPS Parking Lot N/A: Schoenecker Center
	Plumbing/Gas Permits and Inspections	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot
	Right-of-Way Plan Review	To be applied for, if applicable
	Sewer Permits	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Sidewalk Permit	To be applied for, if applicable
	Sign Permit	To be applied for, if applicable
	Site Plan Review	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
	Tank Permit	Received: Schoenecker Center N/A: Arena, Schoenecker Center, SPS Parking Lot
	Plumbing Permit	Received: Arena, Schoenecker Center To be applied for: Microgrid Project N/A: SPS Parking Lot
	Transportation Demand Management Plan	Received: Arena, Schoenecker Center To be applied for: Microgrid Project, SPS Parking Lot
Saint Paul Regional Water Services	Hydrant Permit	Received: Arena, Schoenecker Center To be applied for, if applicable: Microgrid Project N/A: SPS Parking Lot
	Backflow Preventer Permit (and Testing)	To be applied for, if applicable

Unit of Government	Type of Application	Status
	Water Main Installation	Received: Arena, Schoenecker Center To be applied for, if applicable: Microgrid Project N/A: SPS Parking Lot

10.Land Use

a. Describe:

i. Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, and prime or unique farmlands.

The existing Arena site is part of the University of St. Thomas South Campus and included several buildings (Cretin Hall, Service Center, McCarthy Gymnasium), surface parking lots (Lots N, O, P1, V, X, and Y), and sidewalks (see Appendix A, 2023 Site Plan) that have been demolished. The existing Schoenecker Center site is part of the University of St. Thomas South Campus and included Loras Hall, surface parking lots (Lots M and P1), and sidewalks (see Appendix A, 2020 Site Plan) that were demolished. The existing Microgrid Project site is part of the University of St. Thomas South Campus and will be an expansion to the south of Owens Science Hall in the location of the existing greenhouse proposed to be demolished (see Appendix A, 2023 Site Plan). The existing SPS Parking Lot site is part of the St. Paul Seminary campus and includes existing lawn/landscaping space (see Appendix A, 2023 Site Plan). Adjacent existing land use is institutional in all directions (the University of St. Thomas and St. Paul Seminary campuses). Beyond campus to the north lies park/recreational and residential land, to the east lies residential and mixed-use land, to the south lies residential properties, and to the west lies park/recreational/preserve and open water (see Figure 4).

There are two parks within ¼ mile of the project site: Mississippi Gorge Regional Park to the west and Shadow Falls Park to the northwest. The Mississippi Gorge East River Parkway Trail extends through both parks. Summit Ave directly to the north of the project site is a parkway.

There are no cemeteries or prime or unique farmland within or adjacent to the project site.

ii. Planned land use as identified in comprehensive plans (if available) and any other applicable plan for land use, water, or resource management by a local, regional, state, or federal agency.

In 2020, the City of Saint Paul adopted the *2040 Comprehensive Plan* to guide development in the city over the next 20 years.

The *2040 Comprehensive Plan* Future Land Use map designates the project site as Civic and Institutional, which includes building and open space for major institutional campuses. Three policies apply to the Civic and Institutional land use category;

however, one is specific to the Capitol Area and is not applicable to the project site. Policy LU-53 encourages partnerships with colleges and universities to strengthen connections with the community and adjacent neighborhoods, and support workforce development, business creation and innovation, and retention of youth and young professionals. Policy LU-54 aims to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution-owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.

The project site is located in the Mississippi River Corridor Critical Area (MRCCA). The MRCCA is designated in Minnesota state law and applies to land areas on both sides of the Mississippi River in the Minneapolis-Saint Paul-Bloomington metropolitan area along a roughly 72-mile stretch of the river between Coon Rapids and Hastings, MN. The intent of the MRCCA is to protect and preserve the natural, scenic, recreational, and transportation resources along the corridor, which is done through additional planning requirements and development standards, implemented by communities located in the MRCCA.

The MRCCA was established by Governor's Executive Order 79-19. In 2017, the Minnesota Department of Natural Resources promulgated new MN Rules Sec, 6106 in place of the original executive order. Among the new features of MN Rules 6106 is that all municipalities within the MRCCA were required to include an MRCCA-specific chapter in their 2040 comprehensive plans. Saint Paul's plan includes Policy CA-1, stating that the City guide land use and development activities consistent with the management purpose of each of the MRCCA Districts. The project site is located within the River Towns and Crossings District (CA-RTC) of the MRCCA. The CA-RTC District includes historic downtown areas and limited nodes of intense development at specific river crossings. Institutional campuses that predate designation of the Mississippi River, such as the project site, are also included in this District. Priorities of the MRCCA include minimizing erosion, minimizing untreated stormwater runoff into the river, maintaining public access to and public views of the river, and restoring natural vegetation in riparian corridors and tree canopy. While comprehensive plan policy language has been adopted and still applies, it should be noted that MN Rules 6106 also require all municipalities to adopt zoning regulations consistent with the rules for all areas within the MRCCA. Saint Paul is in the process of formal adoption of new ordinance language consistent with MN Rules 6106 but has not yet completed the adoption. Per the Rules, Saint Paul's existing MRCCA ordinance, which refers to the area where the project is located as the RC3 River Corridor Urban Open (an overlay zoning district), must remain in effect until new MRCCA zoning is formally adopted by the City.

iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The project site is currently zoned H2. The H2 district allows residential uses as well as some civic and institutional uses. In the H2 district, up to six units per lot are allowed subject to requirements for minimum lot area per unit and density bonuses. Colleges, universities, and seminaries are allowed in H2 subject to a conditional use

permit. The CUP for campuses defines campus boundaries and regulates building heights and setback requirements, among other things. There is an existing CUP in place for the University of St Thomas campus. The CUP specifies building height limits of 75' for the western portion of the project site and 60' for the northern and eastern portions.

In addition to the underlying zoning and CUP, the project site is covered by two overlay zoning districts: the SH Student Housing Neighborhood Overlay District and overlay zoning for the MRCCA. The Student Housing overlay district only applies to non-owner-occupied single family and homes and duplexes, and does not apply to the proposed Arena. The project is also within the RC3 River Corridor Urban Open Overlay District (MRCCA, see Figure 6). The RC3 River Corridor Urban Open Overlay District limits building heights to 40 feet. Once formally adopted, Saint Paul's new MRCCA zoning will conform MN Rules 6106, which will allow for heights of 48' and up to 65' with a conditional use permit for the project site.

- iv. If any critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those housing occupants who may be insufficiently mobile) are proposed in floodplain areas and other areas identified as at risk for localized flooding, describe the risk potential considering changing precipitation and event intensity.**

No critical facilities are proposed as part of the project, and the project site is not located within a FEMA 100-year floodplain area.

- b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 10a above, concentrating on implications for environmental effects.**

The proposed Arena, Schoenecker Center, Microgrid Project, and SPS Parking Lot projects are generally compatible with surrounding campus land uses on each campus and with the H2 zoning of the site and the RM2 and H2 zoning in the adjacent areas. The H2 and RM2 districts allow residential uses as well as some civic and institutional uses. In the H2 district, up to six units per lot are allowed subject to requirements for minimum lot area per unit and density bonuses. Colleges, universities, and seminaries are allowed in H2 subject to a conditional use permit.

The Arena building is designed as a four-story building to a structure height for the main Arena section proposed at 58 feet 3 inches. The portion of the Arena to house basketball practice facilities is designed to a structure height of 66 feet. Prominent corners of the building are designed as raised parapets for stair or elevator overruns and/or mechanical screening at a height of 74 feet 8 inches. All measurements are as defined by the City of Saint Paul building height calculations, which measure from the average grade at the base of the building to various points near the top of the building depending on the type of roof system utilized. Parapets, stair or elevator overruns, and mechanical screening are not calculated towards the building height per the City's zoning regulations. For sloped roofs, the midpoint of the roof is used for structure height calculations.

The Schoenecker Center is designed as a four-story building to a structure height of 58 feet, with the top of roof designed to a height of 73 feet 10 inches. Raised parapets for stair or elevator overruns and/or mechanical screening are designed at a height of 77 feet.

The Microgrid project is designed as a two-story addition to Owens Science Hall, with a structure height of 29 feet. Raised parapets for stair or elevator overruns and/or mechanical screening are designed at a height of 31 feet 4 inches. The top of the relocated greenhouse is designed to a structure height of 37 feet.

The proposed structure heights of the Arena and the Schoenecker Center exceed the maximum height allowed in the RC3 River Corridor Urban Open Overlay District of 40 feet. However, the more specific height requirements of the University of St. Thomas CUP, 75' feet in the western portion of the project site and 60' in the northern and eastern, are controlling for purposes of height regulation per a long-standing City interpretation. The facility's structure heights do not exceed the maximum height allowance as defined by the University of St. Thomas' Conditional Use Permit using the City of Saint Paul building height calculations. Note that the basketball practice facilities portion of the Arena building, which is designed to a height of 66 feet, is located within the portion of the site with a building height restriction of 75 feet. There is a portion of the basketball practice facility that is intentionally stepped down to a lower elevation where it crosses over into the 60-foot height zone to comply with this requirement.

- c. **Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 10b above and any risk potential.**

As noted above in Item 10b, no land use or zoning incompatibilities were identified.

11. Geology, Soils, and Topography/Landforms

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

According to the Geologic Atlas of Ramsey County (1992),¹⁴ bedrock geology of the project site consists of Decorah Shale – green, calcareous shale with thin limestone interbeds. In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the Arena portion of the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Bedrock was encountered at depths of 8 feet to 12 feet below ground surface. Groundwater was encountered in penetration test borings at depths of 6 feet to 12 feet below ground surface. Groundwater was also encountered in limestone seams within the bedrock formation. Surficial geology of the project consists of stream sediment of Glacial River Warren. The existing soil and bedrock stability provide adequate support for the use of spread footings for the building. The majority of the building will sit above the existing bedrock elevation, therefore avoiding the perched groundwater layer that sits atop the shale bedrock. The existing buildings that were removed were replaced with well-draining sands to allow perched groundwater to flow more easily along its intended path, both further into the

¹⁴ Geologic Atlas of Ramsey County, Minnesota. Minnesota Geological Survey. Available at <https://conservancy.umn.edu/handle/11299/58233>.

earth to lower groundwater levels and towards the Mississippi River. The portion of the Arena that extends into the bedrock layer will allow perched groundwater to migrate deeper into the earth to reach the lower groundwater elevation and the use of draitile at the building foundations will also allow the groundwater to continue to drain downstream towards its ultimate outfall at the Mississippi River.

In January 2021, American Engineering Testing prepared a Report of Geotechnical Exploration for the Schoenecker Center portion of the project site. American Engineering Testing completed surface exploration which consisted of eight penetration test borings throughout the location of the Schoenecker Center. One of the eight penetration test borings was cored 20 feet into the shale bedrock in an effort to obtain information regarding the consistency of the shale, weathering of bedrock, and the presence and thickness of limestone stringers. Bedrock was encountered at depths of 6 feet to 12 feet below ground surface. Groundwater was encountered in penetration test borings at depths of 10 feet to 12 feet below ground surface and was also encountered in limestone seams within the bedrock formation. The Schoenecker Center was constructed with conventional spread footings over the existing stable soil and bedrock found on that portion of the site. Foundation and below slab draitile for the basement level of the building were used to capture groundwater and direct it to the underground cistern located on the north side of the building. Water collected and stored in the underground cistern is reused for irrigation or discharged to the storm sewer.

In August 1995, American Engineering Testing prepared a Soil Borings and Engineering Analysis Report for the Owens Science Hall and O'Shaughnessy Science Hall buildings. Since the location of the proposed Microgrid Project is where the south side of Owens Science Hall exists, this soils report is utilized for assessment of the soil conditions in that portion of the site. The report included soil borings from a June 1995 report from GME Consultants, Inc. and two soil borings completed by American Engineering Testing from July 1995, one of which was cored into the existing bedrock. Bedrock was encountered at depths of 9 feet to 12 feet below ground surface. Groundwater was encountered at depths of 9 feet to 15 feet below ground surface. The Microgrid Project is designed with conventional spread footings over the existing stable soil and bedrock found on that portion of the site. Foundation draitile is proposed for the basement level foundations to continue the path of groundwater as described in the Arena section above.

In July 2024, American Engineering Testing prepared a Report of Geotechnical Exploration for the SPS Parking Lot portion of the project site. American Engineering Testing completed surface exploration which consisted of two penetration test borings throughout the location of the SPS Parking Lot. Bedrock was encountered at a depth of 4 feet below ground surface. Groundwater was encountered in penetration test borings at a depth of 6 feet below ground surface. The SPS Parking Lot is designed as a typical pavement section with asphalt over an aggregate base. Pervious pavers, with the addition of stone columns below ground down to bedrock, are used at the surface level to infiltrate stormwater runoff.

No sinkholes or karst conditions were identified at the project site.

- b. Soils and Topography – Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability, or other soil limitations, such as**

steep slopes or highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections, or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 12.b.ii.

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, there are four soil types within the site: the Urban land-Chetek complex, 3 to 15 percent slopes and the Urban land-Waukegan complex, 0 to 3 percent slopes, which cover the majority of the project site, and Brill silt loam and Chetek sandy loam, 12 to 15 percent slopes, which cover the Saint Paul Seminary Parking Lot portion of the project site. Due to the location of the site and the classification of the Urban land-Waukegan and Urban land-Chetek complexes, the soil types are not rated for an erosion hazard rating, meaning that there is not enough information to make a determination regarding soil erodibility. The Brill silt loam and Chetek sandy loam units are mapped with slight and severe soil erodibility ratings, respectively.

In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the Arena portion of the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Fill, consisting of a mixture of sandy lean clays, lean clays, clayey sands, and silty sands, was encountered at all boring locations to depths of 3 feet to 9.5 feet below ground surface. American Engineering Testing concluded that the fill material has variable strength and compressibility, are mostly slow draining and are susceptible to freeze-thaw movements. Soils documented below fill included coarse alluvial soil and till, determined to be moderate to slow draining and susceptible to freeze thaw movements.

Site grading for the proposed Arena will occur, with approximately 60,000 cubic yards of excavation proposed for site grading and development. Grading activities within the site began in spring 2024. Where required, slope stabilization will be provided by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control. The proposed development within the site will require compliance with the Capitol Region Watershed District's and the City of Saint Paul's erosion and sediment control standards.

In January 2021, American Engineering Testing prepared a Report of Geotechnical Exploration for the Schoenecker Center portion of the project site. American Engineering Testing completed surface exploration which consisted of eight penetration test borings throughout the location of the Schoenecker Center. One of the eight penetration test borings was cored 20 feet into the shale bedrock in an effort to obtain information regarding the consistency of the shale, weathering of bedrock, and the presence and thickness of limestone stringers. Fill, consisting of a mixture of sandy lean clays, lean clays, clayey sands, and silty sands, was encountered at all boring locations to depths of 2 feet to 4 feet below ground surface, with some deeper fill to a depth of 7 feet at one boring location. American Engineering Testing concluded that the fill material has variable strength and compressibility, are mostly slow draining, and are susceptible to freeze thaw movements.

Site grading for the Schoenecker Center portion of the project occurred in 2022 with approximately 50,000 cubic yards of excavation for site grading and development. All vegetation has been established and the site is permanently stabilized.

In August 1995, American Engineering Testing prepared a Soil Borings and Engineering Analysis Report for the proposed Owens Science Hall and O'Shaughnessy Science Hall buildings. Since the location of the proposed Microgrid Project is where the south side of Owens Science Hall exists, this soils report is utilized for assessment of the soil conditions in that portion of the site. The report included soil borings from a June 1995 report from GME Consultants, Inc. and two soil borings completed by American Engineering Testing from July 1995, one of which was cored into the existing bedrock. The soils encountered were generally topsoil, silty and sandy clay, and some silty sand over existing bedrock.

Site grading for the proposed Microgrid Project is anticipated to begin in 2025 with approximately 6,000 cubic yards of excavation for site grading and development. Where required, slope stabilization will be provided by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control.

In July 2024, American Engineering Testing prepared a Report of Geotechnical Exploration for the SPS Parking Lot portion of the project site. American Engineering Testing completed surface exploration which consisted of two penetration test borings throughout the location of the SPS Parking Lot. Fill, consisting of organic clay overlying sands and silty sands with gravel, was encountered at all boring locations to a depth of 4 feet below ground surface. American Engineering Testing concluded that the organic clay and silty sand fill material has variable strength and compressibility, are mostly slow draining, and are susceptible to freeze thaw movements. The sand fill is fast draining and are not susceptible to frost related movements.

Site grading for the SPS Parking Lot portion of the project is anticipated to begin in 2025 with approximately 500 cubic yards of excavation for site grading and development. Where required, slope stabilization will be provided by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control.

12. Water Resources

- a. **Describe surface water and groundwater features on or near the site below.**
 - i. **Surface Water – lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, shoreland classification and floodplain/floodway, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include the presence of aquatic invasive species and the water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.**

There are no surface waters located within the project site (see Figure 7). No trout streams or lakes, wildlife lakes, migratory waterfowl feeding and resting lakes, or outstanding resource value waters are located within the project site or within one mile of the project site.

The National Wetlands Inventory identifies 12 wetland and water features within 1 mile of the project site, including the Mississippi River which is located less than ¼ mile west of the project site (see Figure 7). This segment of the Mississippi River is also identified as a Minnesota Department of Natural Resources (DNR) Public Watercourse and Public Water Basin (U.S. Lock & Dam #1 Pool).

The Mississippi River is listed as impaired on the Minnesota Pollution Control Agency's (MPCA's) Part 303d Impaired Waters List (ID Number 07010206-814). This stretch of the river, from Upper St. Anthony Falls to the St. Croix River, is listed as impaired for mercury, PCBs, PFOS, aluminum, nutrients, total suspended solids, and fecal coliform. Total Maximum Daily Load (TMDL) plans have been approved for mercury in fish tissue and water column, nutrients, and total suspended solids.

The National Hydrography Dataset from the U.S. Geological Survey identifies nine flowline features within 1 mile of the project site, including the Mississippi River. The nearest NHD-mapped flowline is a stream approximately 140 feet west of the project site, in alignment with the Grotto. The Grotto is a known feature within the campus. The Grotto is a linear aquatic feature that conveys stormwater run-off from the impervious surfaces within the project site. The next nearest NHD-mapped flowline is approximately 540 feet away to the north with Summit Ave and existing residential properties are between the project site and that flow line.

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

According to the Minnesota Department of Natural Resources' (DNR's) Minnesota Hydrogeology Atlas,¹⁵ depth to groundwater is mapped as greater than 50 feet across the site. In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the Arena portion of the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Groundwater was encountered in penetration test borings at depths of 6 feet to 12 feet below ground surface. Groundwater was also encountered in limestone seams within the bedrock formation.

In January 2021, American Engineering Testing prepared a Report of Geotechnical Exploration for the Schoenecker Center portion of the project site. American Engineering Testing completed surface exploration which consisted of eight penetration test borings throughout the Schoenecker Center portion of the project site. Groundwater was encountered in penetration test borings at depths of 10 feet to 12 feet below ground surface. Groundwater was also encountered in limestone seams within the bedrock formation.

In August 1995, American Engineering Testing prepared a Soil Borings and Engineering Analysis Report for the proposed Owens Science Hall and

¹⁵ Minnesota Department of Natural Resources. Minnesota Hydrogeology Atlas. Available at https://www.dnr.state.mn.us/waters/groundwater_section/mapping/mn-hydro-atlas.html.

O'Shaughnessy Science Hall buildings. Since the location of the proposed Microgrid Project is where the south side of Owens Science Hall exists, this soils report is utilized for assessment of the soil conditions in that portion of the site. The report included soil borings from a June 1995 report from GME Consultants, Inc. and two soil borings completed by American Engineering Testing from July 1995, one of which was cored into the existing bedrock. Groundwater was encountered at depths of 9 feet to 15 feet below ground surface.

In July 2024, American Engineering Testing prepared a Report of Geotechnical Exploration for the SPS Parking Lot portion of the project site. American Engineering Testing completed surface exploration which consisted of two penetration test borings throughout the location of the SPS Parking Lot. Groundwater was encountered in penetration test borings at a depth of 6 feet below ground surface.

According to the Minnesota Department of Health's (MDH's) Minnesota Well Index,¹⁶ one active irrigation well is mapped south of McCarthy Gymnasium; however, this well was removed in January 2024. In March 2023, American Engineering Testing installed a temporary piezometer to measure groundwater levels. The well has not been updated on MDH's Well Index. This temporary piezometer was removed in February of 2024. According to MDH's Source Water Protection Web Map Viewer,¹⁷ the project site is not within a wellhead protection area or drinking water supply management area.

b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects below.

i. Wastewater – For each of the following, describe the sources, quantities, and composition of all sanitary, municipal/domestic, and industrial wastewaters projected or treated at the site.

1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

Wastewater pretreatment measures to be installed at the Arena portion of the project site include a commercial kitchen grease trap. Existing sanitary sewers to serve the project site are located along Summit Avenue, Cretin Avenue, and Grand Avenue. The Arena site design includes a new sanitary sewer connection up to the south side of Summit Avenue and connection near the southeast corner of the site to an existing sanitary sewer within the site. These convey wastewater via city sanitary sewers to the Metropolitan Council interceptor system and eventually to the Metropolitan Council Wastewater Treatment Plant. The Metropolitan Council Wastewater Treatment Plant is an advanced secondary treatment plant with ultraviolet disinfection. The plant currently treats approximately 178 million gallons per day (GPD), with a capacity of up to 314

¹⁶ Minnesota Department of Health. Minnesota Well Index. Available at <https://mnwellindex.web.health.state.mn.us/>.

¹⁷ Minnesota Department of Health. Source Water Protection Web Map Viewer. Available at <https://mdh.maps.arcgis.com/apps/View/index.html?appid=8b0db73d3c95452fb45231900e977be4>.

million GPD according to the Metropolitan Council Environmental Services (MCES) Plant Inflow Summary Report for the period ending September 30, 2014. A SAC Determination was received for the Arena in December 2023 which indicated 116 SAC for the building. SAC Determinations were received for the Service Center, McCarthy Gymnasium, and Cretin Hall in October and November 2023 which indicated 5, 21, and 23 SAC Credits respectively when those buildings were demolished. Therefore, the net SAC increase for the Arena project is 67 SAC. This equates to an estimated daily flow of 0.018 (MGD). Using the Metropolitan Council's hourly peaking factor of 3.2, the estimated peak flow generated is 0.059 MGD (0.02 percent of existing capacity).

The Schoenecker Center project included a new sanitary sewer connection up to the south side of Summit Avenue, the same city sanitary sewer pipe previously mentioned. A SAC Determination was received for the Schoenecker Center project in January 2022 which indicated 94 SAC for the building. A SAC Determination was received for Loras Hall in January 2021 which indicated 9 SAC Credits when that building was demolished resulting in a net increase of 85 SAC for the Schoenecker Center building. This equates to an estimated daily flow of 0.023 (MGD). Using the Metropolitan Council's hourly peaking factor of 3.2, the estimated peak flow generated is 0.074 MGD (0.02 percent of existing capacity).

The Microgrid Project will be served by sanitary sewer interior to the existing building it is connected to. Based on the MCES SAC criteria calculator, the Microgrid Project would have an estimated value of 9 SAC, which equates to an estimated daily flow of 0.002 (MGD). Using the Metropolitan Council's hourly peaking factor of 3.2, the estimated peak flow generated is 0.008 MGD (less than 0.01 percent of existing capacity).

There is no sanitary flow anticipated for the SPS Parking Lot project.

Thus, the existing municipal wastewater infrastructure is capable of handling the new demand generated by the redevelopment.

- 2) **If the wastewater discharge is to a subsurface sewage treatment system (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system. If septic systems are part of the project, describe the availability of septage disposal options within the region to handle the ongoing amounts generated as a result of the project. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion.**

Not applicable.

- 3) **If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects.**

Not applicable.

- ii. **Stormwater – Describe changes in surface hydrology resulting from change of land cover. Describe the routes and receiving water bodies for runoff from the project site (major downstream water bodies as well as the immediate receiving waters). Discuss environmental effects from stormwater discharges on receiving waters post-construction, including how the project will affect runoff volume, discharge rate, and change in pollutants. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion. For projects requiring NPDES/SDS Construction Stormwater permit coverage, state the total number of acres that will be disturbed by the project and describe the stormwater pollution prevention plan (SWPPP), including specific best management practices to address soil erosion and sedimentation during and after project construction. Discuss permanent stormwater management plans, including methods of achieving volume reduction to restore or maintain the natural hydrology of the site using green infrastructure practices or other stormwater management practices. Identify any receiving waters that have construction-related water impairments or are classified as special as defined in the Construction Stormwater permit. Describe additional requirements for special and/or impaired waters.**

The existing project site, prior to the demolition of Loras Hall in preparation for the Schoenecker Center project construction, consisted of approximately 6.6 acres of impervious surfaces, including approximately 1.7 acres of impervious surfaces which drained via topography west towards the Grotto. The Grotto lies on the University of St. Thomas campus, west of the project site and follows a drainage channel west towards the Mississippi River based on a review of topography. A National Hydrography Dataset (NHD) stream is mapped in this area. The stormwater flow draining directly to the Grotto was untreated and uncontrolled runoff. The remaining approximately 4.9 acres of impervious surfaces drained towards the southeast to an existing storm sewer tunnel within the St. Thomas parcel, or to the adjacent Summit Avenue, Mississippi River Boulevard, and Goodrich Avenue storm sewer systems, all which discharge to the Mississippi River. There were two existing stormwater treatment systems that treated some of the stormwater runoff before leaving the site into the existing storm sewer tunnel, one east of the Anderson Parking Facility and the other beneath the South Athletic Fields.

After construction is complete, approximately 8.2 acres of impervious surfaces are expected within the project site, 1.1 acres of which will drain towards the Grotto. The remaining approximately 7.1 acres of impervious surface within the project site will drain to the Mississippi River through either the southeastern storm sewer tunnel or the Summit Avenue, Mississippi River Boulevard, or Goodrich Avenue storm sewer systems. A change in drainage patterns with the Arena construction directs 1.0 acres of impervious surface in the form of building roof water from Owens Science Hall and O'Shaughnessy Science Hall towards the Grotto. This additional drainage is outside of the project site, but when added to the impervious area above draining to the Grotto within the project site, this results in an increase of 0.4 ac impervious draining to the

Grotto. However, the increase in impervious surfaces draining to the Grotto will now be treated per both water quality and runoff control requirements through underground filtration devices, thus improving the water quality and flow conditions. Post-construction quality of stormwater runoff from the project site overall will be improved by best management practices (BMPs) to meet MPCA and Capitol Region Watershed District treatment requirements. To accomplish this, two stormwater filtration systems were added for the Arena project, one water reuse for irrigation system was added for the Schoenecker Center project, and pervious pavers are proposed for the SPS Parking Lot project, all to avoid increasing the runoff rate of stormwater and to improve the water quality of the stormwater runoff. The Microgrid Project will utilize the existing Anderson Parking Facility stormwater treatment system.

A Stormwater Pollution Prevention Plan (SWPPP) will be developed for the proposed projects in accordance with the National Pollutant Discharge Elimination System (NPDES) permit administered by the MPCA. SWPPPs and NPDES Permits were developed and received for the Schoenecker Center and Arena projects. The SWPPP will cover temporary measures to prevent pollution during construction (erosion and sediment control as well as controls to minimize spills, leaks, or other discharges of pollutants) and permanent measures to prevent stormwater pollution after construction. These BMPs may include one or more of the following: silt fencing, inlet sediment filters, sediment traps, diversion ditches, grit chambers, temporary ditch checks, rock filter dikes, fiber logs, turf reinforcement mats, temporary seeding, riprap and erosion control blankets for disturbed areas, and seeding or placement of sod or other plant material for final restoration. An Erosion Control Plan checklist will be followed by the design teams to meet city and state requirements, minimize drainage problems and soil erosion, and prevent sediment from entering curb and gutter systems and storm sewer inlets.

The project will comply with all city, watershed district, county, and state rules for stormwater management, which will be addressed in the Stormwater Management Plan that will be reviewed by the city for compliance.

- iii. Water Appropriation – Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use, and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or**

quality, such as reuse of water, connections with another water source, or emergency connections.

Construction dewatering may be required for the remaining development within the project site. Construction dewatering did occur for the Schoenecker Center project. Construction activities associated with dewatering will include discharging into temporary sedimentation basins to reduce the rate of water discharged from the site, as well as discharging to temporary stormwater BMPs. Any temporary dewatering will require a DNR Temporary Water Appropriations General Permit 1997-0005 if less than 50 million gallons per year and less than one year in duration. It is anticipated that the temporary dewatering would only occur during utility installations and if needed construction of building footings.

The water supply will be obtained from the municipal water supply system operated by Saint Paul Regional Water Services (SPRWS). SPRWS obtains water from the Mississippi River, which is filtered through a chain of lakes and drawn into the treatment plant from Vadnais Lake. The system also has 10 water supply wells, which obtain water from the Prairie du Chien and Jordan aquifers. These wells are typically only used for emergency backup or are run at limited volumes to help control temperature and odor from the surface water intakes. By only running the wells at these limited times, SPRWS is reducing the potential impact to the available groundwater supplies, relying instead on the available surface water supplies.

Two eight-inch water mains will serve the Arena for the domestic water use. Peak demand for domestic water is projected at approximately 380 GPM. Water use will include water closets, sinks, showers, HVAC makeup water, and ice making which will serve toilet rooms, commercial kitchens, locker rooms, ice making equipment, and HVAC makeup water. The project site is currently part of the University of St. Thomas campus and existing infrastructure will be modified.

An 8-inch fire service water main and a 4-inch domestic service water main were extended from an existing 8-inch water main within the project area to service the Schoenecker Center project. Peak demand for domestic water was projected at 205 GPM during the design process.

The Microgrid Project will be served by a water main interior to the existing building the project is connected to. Peak demand is undetermined at the current level of project design; however, project expectations on duration include average usage during the academic year and light to medium usage in the summer.

No wells will be used as a water source for the projects within the project site. One existing well was located at the southern edge of McCarthy Gymnasium and was removed in January 2024. One temporary piezometer was installed at the project site to document groundwater levels and was removed in February 2024. If unidentified wells are found during construction, the MPCA and MDH must be contacted to determine the course of action, which may include sealing, relocating, or preserving by a licensed well contractor according to Minnesota Rules Chapter 4725.

iv. **Surface Waters**

- 1) **Wetlands – Describe any anticipated physical effects or alterations to wetland features, such as draining, filling, permanent inundation, dredging, and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed and identify those probable locations.**

No wetlands are located within the project site; therefore, no impacts are anticipated.

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

The intent of the site design will be to allow hydrology to be maintained as it exists today to the Grotto. Measures that are planned to avoid, minimize, or mitigate environmental impacts include:

- Connecting relocated storm sewer pipes into the existing storm sewer pipe upstream of the Grotto outlet to avoid disturbing the outlet connection and the existing vegetation within the channel.
- Matching existing drainage areas to maintain a consistent volume of stormwater to the Grotto. Reducing volume to the Grotto may cause the existing channel to dry up and increasing volume to the Grotto may cause erosion of the existing channel and areas downstream.
- Discharging building roof water to the Grotto in lieu of surface parking lot, since building roof water is relatively clean compared to site water which often contains salts and sediments.

No other surface waters are located within the project site; therefore, no additional impacts to surface waters are anticipated.

13. Contamination/Hazardous Materials/Wastes

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

The MPCA’s What’s in My Neighborhood database was reviewed to determine if any known contaminated properties or potential environmental hazards are located within or adjacent to the site. Four sites were identified within the project site, and one site was identified adjacent to the site (see Figure 8 and Table 7).

Table 7: What’s in My Neighborhood Sites

Site ID	Site Name	Active	Activity	Program
105494	University of Saint Thomas	Yes	Petroleum Remediation, Leak Site, Underground Tanks	Investigation and Cleanup
145996	UST South Campus Facilities Bldg	No	Construction Stormwater	Stormwater
251021	University of St. Thomas Schoenecker Center	No	Construction Stormwater	Stormwater
257789	Lee & Penny Anderson Multipurpose Arena	Yes	Construction Stormwater	Stormwater
143128	Soccer/Softball Field Improvements	No	Construction Stormwater	Stormwater

The Schoenecker Center project removed an existing 20,000 gallon underground fuel tank located within the Owens Science Hall loading dock driveway. The Arena project removed an existing 20,000 gallon underground fuel tank located underneath a parking lot drive lane near the northwest corner of the Service Center.

- b. Project Related Generation/Storage of Solid Wastes – Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.**

According to the Ramsey County Solid Waste Management Master Plan 2018-2038, Ramsey County will ensure compliance with applicable laws, rules, and ordinances related to the management of solid and hazardous waste as required by Minnesota Statutes, Section 473.811.

Waste Generated During Construction

Demolition debris and earth materials will be generated during demolition of the existing facilities. Demolition debris is inert material such as concrete, brick, bituminous, and rock. The solid wastes generated during demolition will be recycled or disposed of at a state-permitted landfill. The project will target a 50 percent to 75 percent diversion rate for construction-produced waste as part of the LEED approach.

Construction of the proposed development will generate construction-related waste materials such as wood, packaging, excess materials, and other wastes, which will either be recycled or disposed of in the proper facilities in accordance with state regulations and guidelines.

According to the University of St. Thomas Conditional Use Permit, a demolition survey of each building to be removed must be completed prior to demolition of buildings. The survey will identify asbestos-containing materials for the structures, if present. If asbestos-containing materials are present, they will be removed in accordance with MPCA and MDH regulations. A demolition survey was completed prior to demolition of the buildings for the Arena project and asbestos-containing materials were removed in accordance with MPCA and MDH regulations.

During construction of the Schoenecker Center, 1,782 tons of contaminated soil was excavated, removed from the project site, and properly disposed of off-site. During construction of the Arena project through July 2024, approximately 2,300 tons of contaminated soil were excavated, removed from the project site, and properly disposed of off-site in accordance with state and federal regulations. The Microgrid Project is not anticipated to encounter contaminated soils; however, contaminated soils will be properly disposed of off-site in accordance with state and federal regulations if encountered.

Waste Generated During Operation

Operation of the Arena will generate solid wastes such as food waste, beverage containers, packaging, and paper. In total, it is estimated that the proposed Arena, the Schoenecker Center, and the Microgrid Project will generate approximately 5,895 tons of solid waste per year. A source recycling/separation plan will be implemented for additional waste and waste that cannot be recycled will be managed in accordance with state regulations and guidelines. Waste sorting at the University of St. Thomas currently includes a co-mingled recycling program and a composting program for food waste and other compostable wastes.

- c. **Project Related Use/Storage of Hazardous Materials – Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location, and size of any new above or below ground tanks to store petroleum or other materials. Indicate the number, location, size, and age of existing tanks on the property that the project will use. Discuss potential environmental effects from accidental spills or releases of hazardous materials. Identify measures to avoid, minimize, or mitigate adverse effects from the use/storage of**

chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

No existing above ground storage tanks have been identified within the project site. The Schoenecker Center project removed an existing 20,000 gallon underground fuel tank located within the Owens Science Hall loading dock driveway. The Arena project removed an existing 20,000 gallon underground fuel tank located underneath a parking lot drive lane near the northwest corner of the Service Center.

During construction of the Schoenecker Center, the University of St. Thomas installed one 40,000 gallon underground storage tank which contains fuel oil #2 (light). The tank is a fiberglass, double-wall tank with a leak monitoring system and used only for heating purposes when natural gas is curtailed by Xcel Energy. Natural gas curtailment occurs during periods of peak gas demands, typically during very cold winter days, when gas customers may require more natural gas than is normally available. St. Thomas participates in Xcel Energy's Interruptible Gas program, which reduces gas usage during periods of peak demand at the request of Xcel Energy, to help ensure enough natural gas is available to heat homes and businesses in the community. The University of St. Thomas has notified the Minnesota Pollution Control Agency of the tank installation. The Schoenecker Center project installed one 750 kW generator run on fuel oil #2 with a 275 gallon day tank for fuel storage.

The Arena project will have a 750 kW generator located within the auxiliary ice sheet to provide backup power to the building with a 300-gallon day tank for fuel storage. The chilled water system for the building will have two chillers, one 500 ton and one 112 ton, located within the sublevel mechanical room of the building. The 500 ton chiller will hold approximately 800 pounds of refrigerant, the 112 ton chiller will hold approximately 137 pounds of refrigerant, and the chilled water piping system will have approximately 4,000 gallons of a fluid that is 30% ethylene glycol and 70% water within the system piping. For the ice rink cooling system, there is anticipated to be approximately 1,200 pounds of ammonia and approximately 6,000 gallons of a fluid that is 40% glycol and 60% water. The project proposer will obtain the appropriate permits from the MPCA.

Any hazardous waste materials used or stored during construction and/or operation of the Arena will be disposed of in the manner specified by local or state regulation or by the manufacturer. The Arena project includes preventative measures, such as a subfloor heating system to help reduce the risk of subfloor permafrost, which is a common cause for failure of ice systems and liquid spills, a sealant will be used over the concrete floor for any rooms storing potentially hazardous materials, and a zero permeable vapor barrier is provided below the floor as well. An emergency exhaust system will be installed that is initiated by a refrigerant monitoring system in compliance with MN mechanical codes and the recommendations of ASHRAE Standard 15 and IAAR. A spill prevention plan provides that proper spill prevention controls will be in place for any vehicle refueling or maintenance that occurs on site during construction. St. Thomas will have an Ammonia Plant Safety Program which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. St. Thomas does employ trained professionals with experience in operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus.

The Microgrid Project will have three 500kW generators to provide backup power for the microgrid, each with a 100 gallon day tank for fuel storage. These generators are anticipated to have fuel oil #2 (light) storage tanks at each generator or utilize one fuel storage tank for fuel supply.

As a university with science and engineering labs, St. Thomas is licensed as a hazardous waste generator through Ramsey County, sized as a Small Quantity Generator (SQG). Small Quantity Generators generate between 220 pounds and 2,200 pounds of hazardous waste per month. There will be no change required in this licensure as a result of the Arena, Schoenecker Center, or Microgrid Projects.

- d. Project Related Generation/Storage of Hazardous Wastes – Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous wastes including source reduction and recycling.**

Removal of the existing structures within the site is not expected to generate new hazardous waste. Toxic or hazardous waste to be stored within the site during construction will include fuel and oil necessary to operate heavy construction equipment and during operations may include commercial cleaning supplies. Regulated material and/or waste generated or stored during construction and operations will be managed in accordance with state and local requirements.

The University has been licensed as a small quantity hazardous waste generator by Ramsey County since 1984. There will be no change required in this licensure as a result of the Arena, Schoenecker Center, or Microgrid project.

14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

- a. Describe fish and wildlife resources as well as habitats and vegetation on or near the site.**

The project site, prior to the demolition of Loras Hall in preparation for the Schoenecker Center project construction, was primarily impervious surfaces with minimal landscaping. The SPS Parking Lot portion of the project site currently consists of landscaped green space. There are no above ground streams, rivers, lakes or ponds located within the project site; therefore, the site provides no fish habitat. The site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation. However, wildlife that can be found within the project site may include songbirds and small mammals that have adapted to an urban environment.

Fish and wildlife habitat within the vicinity of the project site includes the Mississippi River, Mississippi Gorge Regional Park, and Shadow Falls Park, all located within ¼ mile of the project site to the west and northwest.

Based on information from the U.S. Fish and Wildlife Service, the project site is located within a high potential zone of the rusty patched bumble bee; however, the disturbed nature of the site is not likely to provide suitable habitat.

The project site is not located within any regionally significant ecological areas (RSEA), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, or native plant communities. However, as described under Item 14b, one RSEA, two MBS Sites of Biodiversity Significance, and eight native plant communities are located within one mile of the project site.

The project site is located within the Mississippi River Twin Cities Important Bird Area (IBA)¹⁸. The Mississippi River IBA includes the Mississippi River and its adjacent floodplain forest and upland areas extending for 38 river miles through 4 counties from Minneapolis to Hastings.

- b. Describe rare features such as state-listed (endangered, threatened, or special concern) species, native plant communities, Minnesota Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-2024-006) which the data were obtained and attach the Natural Heritage Review letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe results.**

State-Listed Threatened and Endangered Species

A review of the DNR's Natural Heritage Inventory System (NHIS) was conducted per license agreement LA-2024-006 for the project site and the area within approximately one mile of the project site. The database includes known occurrences of any state endangered, threatened, or special concern species. The review identified 141 records of 9 species that may be found near this area (see Table 8).

¹⁸ netapp.audubon.org/iba/Reports/2421

Table 8: State-Listed Threatened and Endangered Species

Species	Group	Status	Location	Habitat
Handsome Sedge (<i>Carex formosa</i>)	Vascular Plant	Endangered	One record is located within the project site and one record is located within one mile of the project site.	Preferred habitat within Ramsey County includes forested slopes along the Mississippi River.
Higgins Eye (<i>Lampsilis higginsii</i>)	Mussel	Federally and State Endangered	One record is located within one mile of the project site.	Preferred habitat is stable substrates of the Mississippi River and the lower portion of some large tributaries.
Kentucky Coffee Table (<i>Gymnocladus dioica</i>)	Vascular Plant	Special Concern	One record is located within the project site.	Preferred habitat includes mesic hardwood forest on terraces of the Mississippi River.
Leadplant Flower Moth (<i>Schinia lucens</i>)	Insect	Special Concern	One record is located within one mile of the project site.	Preferred habitat includes mesic to dry native prairie and savanna communities where leadplant occurs.
Mudpuppy (<i>Necturus maculosus</i>)	Amphibian	Special Concern	One record is located within one mile of the project site.	Preferred habitat includes rivers, lakes, reservoirs, and sluggish streams.
Round Pigtoe (<i>Pleurobema sintoxia</i>)	Mussel	Special Concern	One record is located within one mile of the project site.	Preferred habitat includes fast current areas dominated by coarse sand and gravel substrate in medium to large rivers.
Rusty patched Bumble Bee (<i>Bombus affinis</i>)	Insect	Federally Endangered	Eleven records are located within the project site and 110 records are located within one mile of the project site.	Preferred habitat includes semi-natural upland grassland, shrubland, woodlands, and forests. The entire project site is within a High Potential Zone.
Swamp White Oak (<i>Quercus bicolor</i>)	Vascular Plant	Special Concern	One record is located within the project site and two records are located within one mile of the project site.	Preferred habitat includes floodplain forest along the Mississippi River.
Wartyback (<i>Quadrula nodulata</i>)	Mussel	Threatened	Ten records are located within one mile of the project site.	Preferred habitat includes large rivers with fine or coarse substrates in areas with slow to moderate current.

Other Sensitive Ecological Resources

The Mississippi River is located within ¼ mile of the project site and is identified as an RSEA. RSEAs are given a score of 1, 2, or 3 based on how well continuous natural areas meet standards for size, shape, connectivity, adjacent land use, and species diversity, with 3 being the highest possible score. The section of the Mississippi River near the project site has a score of 1. Areas ranked as 1 tend to be small and have less diversity in vegetative cover. They also typically have adjacent land cover types or uses that could adversely affect the RSEA.

Two MBS Sites of Biodiversity Significance, St. Paul Bluffs W and West Bank Mississippi River, are located approximately 0.15 mile and 0.30 mile west of the project site. Each MBS Site is ranked based on rare species populations, native plant communities, and landscape context. Both St. Paul Bluffs W and West Bank Mississippi River have been assigned a moderate rank. Moderate sites contain occurrences of rare species, moderately disturbed native plant communities, and/or landscapes that have strong potential for recover of native plant communities.

Eight native plant communities were identified within one mile of the project site, and approximately align with the St. Paul Bluffs W and West Bank Mississippi River MBS Sites of Biodiversity Significance. The plant communities include one Mesic Prairie (Southern), one Red Oak-White Oak-(Sugar Maple) Forest, three Red Oak-Sugar Maple-Basswood-(Bitternut Hickory) Forests, and three Silver Maple-(Virginia Creeper) Floodplain Forests.

As noted above in Item 14a, these sites and native plant communities are not located within the project site.

- c. **Discuss how the identified fish, wildlife, plant communities, rare features, and ecosystems may be affected by the project, including how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.**

Wildlife Habitat and Threatened and Endangered Species

No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat. No impacts to the state-listed and federally-listed mussels species are expected, as there is no suitable habitat within the project site and no impacts to the nearby Mississippi River are expected. The DNR completed a Natural Heritage Review for the 2023 EAW proposed project site (see Appendix B of the 2023 EAW included in Appendix E). The NHIS review indicated that although no bat records are listed in the NHIS in the vicinity of the project site, all seven of Minnesota's bats, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. To minimize impacts to bat species, the MN DNR recommends that tree removal be avoided from June 1 through August 15, during the active bat season.

The NHIS review indicated that the project site is located within a high potential zone of federally endangered rusty patched bumble bee. According to the DNR, the rusty patched bumble bee is likely to be present in suitable habitat within high potential zones. From April

through October, the rusty patched bumble bee uses underground nests in upland grasslands, shrublands, and forest edges, and forages where nectar and pollen are available. From October through April, the species overwinters under tree litter in upland forests and woodlands. The disturbed nature of the project site is not likely to provide suitable habitat. If applicable, the DNR recommended reseeding disturbed soils with native species of grasses and forbs using Board of Water and Soil Resources (BWSR) or Minnesota Department of Transportation (MnDOT) seed mixes. To ensure compliance with federal law, the DNR recommended that the project conduct a federal review using the U.S. Fish and Wildlife Service's (USFWS) online Information for Planning and Consultation (IPaC) tool.

Based on recommendations from the DNR, a review of federally listed threatened, endangered, and proposed species which may occur within the proximity of the project site was completed through the UWSFWS IPaC tool. A resource list generated for the project site identified nine species which should be considered.

Two bat species were identified in the USFWS resource list: the northern long-eared bat and tricolored bat (*Perimyotis subflavus*). As noted above, the DNR recommends that tree removal be avoided from June 1 through August 15 to minimize impacts to bat species. Four mussel species were identified in the USFWS resource list: Higgins eye, salamander mussel (*Simpsonaias ambigua*), snuffbox mussel (*Epioblasma triquetra*), and winged mapleleaf (*Quadrula fragosa*). As noted above, there is no suitable habitat for mussel species within the project site and no impacts to the nearby Mississippi River are expected.

Two insect species were identified in the USFWS resource list: the rusty patched bumble bee and the monarch butterfly (*Danaus plexippus*). The rusty patched bumble bee is listed as federally endangered, and the monarch butterfly is a candidate species. Candidate status does not provide species protection under the Endangered Species Act listing process. Recommendations from the DNR described above to reseed disturbed soils with native species of grasses and forbs to benefit the rusty patched bumble bee is a best management practice that also applies to the monarch butterfly.

The whooping crane (*Grus americana*) was also identified in the USFWS resource list. This species is classified as an experimental population, non-essential. Experimental population, non-essential status does not provide species protection under the Endangered Species Act listing process outside of federal lands. The project site located outside of federal National Wildlife Refuges and National Parks.

Invasive Species

Invasive species are plants and animals that are not native to an area and are capable of causing harm. Certain measures can be taken to limit the likelihood of introducing invasive species, such as securing local materials to avoid the long-range movement of goods or washing vehicles prior to accessing the project site. Additionally, as landscape designs are finalized, they will consider including native, non-invasive plants.

d. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.

Invasive species will be controlled on site during construction, and proposed landscaping will not include any DNR-identified invasive species. Additionally, best management practices will be followed when relocating construction equipment from other sites.

As noted above in Item 14a, the project site is located within the Mississippi River IBA. According to the DNR, IBAs are voluntary and non-regulatory part of an international conservation effort to bird populations.¹⁹ The constructed Schoenecker Center and planned Arena will be to scale in comparison with other buildings located on the University of St. Thomas South Campus. The Arena will be required to comply with applicable City of Saint Paul lighting and bird-safe glass ordinance language. Fixture modeling and photometric analysis will be completed for all building lighting to analyze light levels for the project.

University of St. Thomas is has incorporated shade trees and increased the landscaped areas with a blend of biodiverse, native, drought tolerant plant species that provide pollinator habitat. The University's existing Pollinator Path is a series of gardens on campus that provide food and habitat for a wide variety of pollinator species and is considered a "living laboratory" for students and community members. No adverse impacts are expected to state-listed and federally-listed species.

15. Historic Properties

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include 1) historic designations; 2) known artifact areas; and 3) architectural features. Attach letter received from the State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

In March 2023, a search of the Minnesota State Historic Preservation Office's (SHPO) Statewide Inventory was requested to identify known historic properties and archaeological sites in the vicinity of the 2023 EAW project site. The database search identified no archaeological records in the project site. Within Township 28N, Range 23W, Section 5, the database search identified 221 records. Of the 221 records, 35 properties are listed in the National Register of Historic Places (NRHP) and 5 properties that are considered eligible for the NRHP. "Considered eligible" means that a federal agency has recommended that the property is eligible for listing in the NRHP and SHPO has accepted the recommendation for the purposes of the environmental review process. However, these properties need to be further assessed before they are officially listed in the NRHP. The remaining 181 records identified in the database search have no designation and may not have been evaluated; therefore, no assumption to their eligibility can be made. Three of the properties identified via the database search are located within the project site, and an additional 14 properties are located within 500 feet of the project site (see Table 9 and Figure 9). Two of the three properties located within the project site were listed as considered eligible and one had no designation; however, these buildings are not considered locally significant for historic preservation. Given the lack of a federal nexus or formal listing on the NRHP and the lack of local

¹⁹ <https://www.dnr.state.mn.us/iba/index.html>

designation no further evaluation or assessment is required. The City of Saint Paul Heritage Preservation staff has also reviewed the project and project site and has determined no further evaluation is needed for demolition of the existing buildings within the project site.

Table 9: Historic Properties within 500 feet of the 2023 EAW Project Site

Property Name	Location Relative to Project	Status
Almendinger Apartments	Within 500 feet of Project Site	No designation
Apartment (2171 Grand Ave. W)	Within 500 feet of Project Site	No designation
Binz Refectory – St. Paul Seminary (University of St. Thomas)	Within 500 feet of Project Site	No designation
Brady Education Center – St. Paul Seminary (University of St. Thomas)	Within 500 feet of Project Site	No designation
Cretin Court Apartments	Within 500 feet of Project Site	No designation
Grace Residence (University of St. Thomas)	Within 500 feet of Project Site	Considered eligible
Grand Student Apartments	Within 500 feet of Project Site	No designation
Grotto and Woodland Walk – St. Paul Seminary	Within 500 feet of Project Site	No designation
McCarthy Recreation Building – St. Paul Seminary (University of St. Thomas)	Project Site	No designation
Mills, H.S., House	Within 500 feet of Project Site	Listed in the NRHP
Nilson Apartments	Within 500 feet of Project Site	No designation
O’Shaughnessy Hall – University of St. Thomas	Within 500 feet of Project Site	No designation
St. Mary’s Chapel (St. Paul Seminary)	Within 500 feet of Project Site	Listed in the NRHP
St. Paul Seminary Gymnasium/Heating Plant (Service Center Building) (University of St. Thomas)	Project Site	Considered eligible
St. Paul Seminary South Dormitory/Cretin Hall (University of St. Thomas)	Project Site	Considered eligible
Tierney, S., House	Within 500 feet of Project Site	Listed in the NRHP

The Minnesota Statewide Historic Inventory Portal (MnSHIP) was reviewed to identify historic resources within the 2024 EAW Update projects site and within 500 feet of the project site. MnSHIP identifies resources as National Register Listed or Eligible, and as Inventoried. Within the 2024 EAW Update project site, four properties were identified including one which is identified as National Register Listed or Eligible and three which are identified as Inventoried. Within 500 feet of the project site, an additional 20 properties were identified as National Register Listed or Eligible and 24 properties were identified as Inventoried.

The northern portion of the project site is located within the Summit Avenue West Heritage Preservation District. In January 2021, the Saint Paul City Council approved the demolition of Loras Hall. In August of 2021, the HPC approved the construction of the Schoenecker Center

building. In November of 2023, the HPC approved the construction of the Arena building. The Microgrid Project and SPS Parking Lot projects require review and approval from the Heritage Preservation Commission (HPC). Review will be complete when detailed project designs are provided to the HPC.

It is not anticipated that unknown archaeological sites will be uncovered during the construction of this project as the site has been previously disturbed. However, if cultural materials are encountered during construction, unanticipated discovery protocols will be followed.

16. Visual

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

The project site includes existing institutional land, and no unique designated scenic views or vistas are located within the site. The City of Saint Paul *2040 Comprehensive Plan* identifies Public River Corridor Views (PRCV) within the Mississippi River Corridor Critical Area (MRCCA) on public property, including parks and trails, historic properties, and bridge overlooks. Views towards bluffs from the opposite side of the shore are also noted. View #3 – Shadow Falls Overlook is located within ¼ mile of the project site; however, the view direction is towards the Mississippi River and away from the project site. Considering the set back from Mississippi Gorge Regional Park, views of the project site from the western bank of the Mississippi River will be minimal.

Policy CA-11 as outlined in the MRCCA plan is intended to protect and minimize impacts to PRCV from public development activities. According to the PRCV map, the project site is not located within the view range of any identified view locations. Therefore, the project will not have an impact on identified significant public views, which is consistent with Policy CA-11.

Generally, views from the surrounding area would be similar to those experienced currently, as current and future land use is within an institutional facility and there are buildings of similar massing already in the area. Changes in views that have occurred for the Schoenecker Center portion of the project site included the removal of an older building and the construction of a building in similar appearance to O-Shaughnessy Science Hall to the east for consistency in materials and building scale. Changes in views for the Arena would be most noticeable from portions of Goodrich Avenue, and from the Grand Avenue right of way. The massing of the Arena building matches that of the surrounding buildings including similar height on the north side to that of the Schoenecker Center, a second and third story step back on the west side adjacent to the lower profiles St. Paul Seminary buildings, and a south and east façade that resembles the heights of the adjacent Grace Hall and Anderson Parking Facility. Changes in views for the Microgrid Project would be most noticeable from portions of the Grand Avenue right of way, namely in the shift of the greenhouse up to the second story instead of the current view of it at the ground level. Changes in views for the SPS Parking Lot would be most noticeable from Mississippi River Boulevard but would similarly match the existing parking that exists on the west side of the roadway. The proposed project will conform with the City's regulations for building height, building form, landscape screening, and lighting. Adverse visual effects are not anticipated.

17. Air

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

Minimal stationary source air emissions are anticipated from natural gas use and #2 fuel oil for the boiler system. See Table 12: Proposed Operational Emissions for more information.

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

Motor vehicles emit a variety of air pollutants including carbon monoxide (CO), hydrocarbons, nitrogen oxides, and particulates. The primary pollutant of concern is CO, which is a byproduct of the combustion process of motor vehicles. CO concentrations are highest where vehicles idle for extended periods of time. For this reason, CO concentrations are generally highest in the vicinity of signalized intersections where vehicles are delayed and emitting CO. Generally, concentrations approaching state air quality standards are found within about 100 feet of a roadway source. Further from the road, the CO in the air is dispersed by the wind such that concentrations rapidly decrease.

The Minnesota Department of Transportation (MnDOT) has developed a screening method designed to identify intersections that will not cause a carbon monoxide (CO) impact above state standards. MnDOT has demonstrated that even in the 10 highest traffic volume intersections in the Twin Cities do not experience CO impacts. Therefore, intersections with traffic volumes lower than these 10 highest intersections will not cause a CO impact above state standards. MnDOT’s screening method demonstrates that intersections with total daily approaching traffic volumes below 82,300 vehicles per day will not have the potential for causing CO air pollution problems. The 10 highest traffic volumes in the Twin Cities include: Cedar Avenue at County Road 42, Hwy 252 at 66th Avenue, Hwy 252 at 85th Avenue, County Road 42 at Nicollet Avenue, Hwy 252 at Brookdale Drive, Hwy 7 at County Road 101, Hwy 7 at Williston Road, University Avenue at Lexington Avenue, University Avenue at Snelling Avenue, and Hennepin Avenue at Lake Street. None of the intersections in the vicinity of the project site exceed the criteria that would lead to a violation of the air quality standards.

- c. **Dust and Odors – Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 17a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.**

The project may generate temporary fugitive dust emissions during construction. These emissions would be controlled by sweeping, watering, or sprinkling, as appropriate or as

prevailing weather and soil conditions dictate. Dust emissions are not anticipated during operations as all surfaces will either be impervious or vegetated.

The construction and operation of the project are not expected to generate objectionable odors.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

- a. **GHG Quantification – For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.**

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs) play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back towards space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming.²⁰

This section includes an estimated quantification of the following GHG emissions associated with the proposed project:

- Carbon Dioxide (CO₂)
- Nitrous Oxide (N₂O)
- Methane (CH₄)

The projected GHG emissions are provided on an average annual basis using the CO₂ equivalent (CO₂e) and include the proposer's best estimate of average annual emissions over the proposed life/design service life of the project. Emissions were estimated using the US

²⁰ Summarized from U.S. EPA, Overview of Greenhouse Gases: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>

Environmental Protection Agency’s Simplified GHG Emissions Calculator (August 2022)²¹ and are summarized by project phase (i.e., construction and operations) and source type (e.g., combustion from mobile equipment, off-site electricity) (see Appendix C of the 2023 EAW included in Appendix E for background analysis). Estimated existing emissions are summarized in Table 10 and estimated proposed emissions are summarized in Table 11 and Table 12 .

Construction emissions are based on length of construction, size of site, and are from mobile equipment including passenger cars, light-duty trucks, medium and heavy-duty trucks, and construction equipment (both gasoline and diesel).

Emissions from cooling and refrigeration systems are not accounted for in this operational emissions analysis as GHGs from refrigerants are approximately less than 5 percent of the total GHG emissions of a building.²² The project will incorporate an ammonia (NH3)-based refrigerant plant for the ice rinks; however, annual usage will be limited for maintenance needs only and therefore not included in the GHG analysis. Ammonia is considered an acceptable non-ozone depleting alternative for ice rinks compared to other hydrochlorofluorocarbons substances under EPA’s Significant New Alternatives Policy program.²³ There will be safety plans in place to handle the ammonia use appropriately. The project will include the use of Zambonis to service the ice rink and a forklift to service the facility and both are planned to be electric and not included in the GHG analysis. The project does not plan to purchase gases during operation or land use conversions.

Table 10: Existing Operational Emissions

Scope	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons/year)
Scope 1	Combustion	Stationary equipment	161
Scope 2	Off-site electricity	Grid-based	523
Scope 3	Off-site waste management ²⁴	Area	294
Total			978

Table 11: Construction Emissions

Scope ²⁵	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons)
Scope 1	Combustion (Arena and Microgrid)	Mobile equipment	1,328

²¹ Source: <https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator>

²² Source: https://practicegreenhealth.org/sites/default/files/2019-06/PracticeGreenhealth_GHG_Toolkit_0.pdf

²³ Source: https://www.epa.gov/sites/default/files/2015-07/documents/ice_rinks_and_the_phaseout_of_hcfc-22.pdf

²⁴ Based on calculations from CalRecycle’s website titled "Estimated Solid Waste Generation Rates," available at <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>.

²⁵ Emissions are categorized as either direct or indirect. Scope 1 emissions are direct emissions that are released directly from properties owned or under the control of the project proposer. This includes, for example, the use of mobile equipment during construction. Scope 2 and 3 emissions are indirect emissions. Scope 2 emissions are associated with the offsite generation of purchased electricity and/or steam. Scope 3 emissions are from the offsite provision of waste management services, including land disposal (landfilling), recycling, and solid waste composting.

Scope ²⁵	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons)
Total			1,328

Table 12: Proposed Operational Emissions

Scope	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons/year)
Scope 1	Combustion (Arena and Microgrid)	Stationary equipment	929
Scope 2	Off-site electricity	Grid-based	1,586
Scope 3	Off-site waste management	Area	570
Scope 1, 2, 3	Schoenecker Facility	Area, Grid-based, Stationary equipment	1,323
Total			4,408

b. GHG Assessment

i. Describe any mitigation considered to reduce the project’s GHG emissions.

The following design strategies and other sustainability measures are being considered for the proposed development to reduce emissions:

- Use energy efficient lighting.
- Occupancy/vacancy and daylight sensor controls on lighting.
- Energy efficient building envelope, including continuous insulation for all roof and wall surfaces and high-performance aluminum glazing systems.
- The Arena will be designed to meet LEED Silver rating.
- The Schoenecker Center has been certified with a LEED Gold rating.
- Install low-flow indoor plumbing fixtures.
- Use high-efficiency boilers for domestic hot water.
- Lower carbon structure and materials selection through incorporation of products with recycled content and/or sustainable manufacturing methods. UST is targeting a 20% GWP reduction from concrete alone and total building reductions of 10% or greater in GWP, eutrophication, acidification, and ozone depletion potential.
- Use low global warming potential refrigerants for the building cooling system.

ii. Describe and quantify reductions from selected mitigation, if proposed to reduce the project’s GHG emissions. Explain why the selected mitigation was preferred.

The proposed mitigation listed in Item 18.b.i includes best management practices for new construction and reducing GHG emissions where practicable during operations.

iii. Quantify the proposed project’s predicted net lifetime GHG emissions (total tons per number of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.

The Next Generation Energy Act requires the state to reduce greenhouse gas emissions in the state by 80 percent between 2005 and 2050, while supporting clean energy, energy efficiency, and supplementing other renewable energy standards in Minnesota. The MPCA’s biennial GHG emissions reduction act report from 2023²⁶ identifies strategies for reducing emissions in the three economic sectors with the highest emissions – transportation, electricity generation, and agriculture, forestry, and land use.

The expected lifespan of the project is 50 years, which equates to an estimated 154,250 CO₂e metric tons over the lifetime of the building (including both construction and operations phases). The proposer is committed to implementing the sustainability measures listed in Item 18.b.i. to reduce operational emissions to the extent practicable. The proposed project will be built in compliance with state regulations (State of Minnesota Statutes Chapter 326.89) and City of Saint Paul building code (Saint Paul Legislative Code Chapter 326).

The University of St. Thomas has had a 53 percent reduction in carbon emissions since 2008, and 20 percent of building square footage on campus are LEED-certified. Additionally, the University has committed to a goal of carbon neutrality by 2035.

In 2007, the Minnesota Legislature passed the Next Generation Energy Act (Minn. Stat. § 216H) into law, which requires the tracking of certain greenhouse gas (GHG) emissions. The statute also includes statewide GHG emission reduction goals, from a 2005 baseline. It is important that environmental documents required by the Minnesota Environmental Policy Act (MEPA) include usable information about the potential effects of a proposed project on GHG emissions and climate change. Estimation of GHG emissions is a useful way to measure the potential climate impacts of a proposed project. It also helps track progress in meeting state and local GHG reduction goals and supports efforts to reduce emissions, mitigate, and adapt to the impacts of climate change.²⁷

Per the EQB’s guidance, vehicle GHG emissions are not reviewed or analyzed for an EAW, outside of understanding the potential carbon footprint of any fleet vehicles owned by the project proposer or during construction, and therefore was not originally included in the 2023 EAW. In order to address vehicle GHG emissions for the anticipated project, as noted in the COA Opinion, an evaluation using the University of New Hampshire methodology²⁸ was utilized for the 2024 EAW Update to understand the potential metric tons of carbon emissions for the anticipated vehicles coming to the site for events held within the Arena. The Schoenecker Center, Microgrid Project, and SPS Parking Lot projects were not included in the

²⁶ Available at <https://www.pca.state.mn.us/air-water-land-climate/climate-change-initiatives>

²⁷ [Revised Environmental Assessment Worksheet \(EAW\) Guidance \(state.mn.us\)](#)

²⁸ [Carbon & Nitrogen Accounting | Sustainability \(unh.edu\)](#)

vehicle GHG emissions analysis as those projects are all to address space deficits for existing programs/functions within the UST and SPS properties, therefore not increasing the number of vehicles coming to and from the properties. It should be noted that the GHG vehicle emissions analysis is for reporting purposes and there are no city, state, or federal regulations for vehicle emissions for a private development.

The anticipated number of vehicles and vehicle miles traveled for the redevelopment were based on the trip generation and modes of transportation described in Section 20 below. As discussed in the 2024 EAW Update Transportation Study Addendum, the addition of the Schoenecker Center and Microgrid Projects to campus do not correlate to additional students, faculty, or vehicle trips (see the 2024 EAW Update Transportation Study Addendum for a detailed explanation). The SPS Parking Lot project is not adding vehicle trips either, as the users of the new parking lot were previously parking on UST's campus and the parking lot project will simply shift the location where those vehicles are parking. Therefore, vehicle emissions were only analyzed for the Arena project. The number of vehicles analyzed was based on the event parking demand analysis table shown in Section 20 (Table 13) and the average round trip miles for each vehicle was analyzed based on UST's past season ticket holder zip code data and extrapolated for each attendance metric. The estimated metric tons of eCO₂ is 341.85 metric tons per year. A spreadsheet of analysis is included in Appendix C.

Vehicular traffic for visiting teams and fans, including charter buses and air travel, currently travel to and from the campus or other areas of the Twin Cities Metro area for basketball and hockey games; therefore, they were not analyzed as there would not be a resultant increase in vehicle emissions from the present day condition. It should also be noted that many of the event attendees currently travel to and from the Campus or the ice arena at St. Thomas Academy. The attendees already traveling to watch events could be subtracted from the quantity above in order to truly identify a net increase in vehicle emissions from present day conditions, but for a conservative estimate, these existing trips were accounted for in the analysis.

With the implementation of a smart parking system, which the University anticipates implementing prior to the Arena opening, higher concentrations of vehicle emissions from idling vehicles are not anticipated as the vehicles traveling to and from South Campus for the Arena project, Schoenecker Center, and Microgrid projects will not be stationary, and these vehicles will be traveling through the area and know where they need to park. Passenger vehicles also continue to become more efficient with less emissions.

Overall, GHG emissions from vehicles associated with the three projects are not anticipated to be significant.

19.Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area; 2) nearby sensitive receptors;

3) conformance to state noise standards; and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

Existing Noise

The project site is located at institutional campuses (University of St. Thomas and St. Paul Seminary campuses) in an urban area, and existing noise at the site is largely from the surrounding roadways. Nearby sensitive receptors include residences approximately 50 feet east, 300 feet south, and 200 feet north of the project site.

Construction Noise

Typical construction noise will be temporarily generated by construction activities. The Saint Paul Code of Ordinances regulates both the hours of operation for construction equipment and allowable noise levels. Construction of the project will adhere to requirements identified in Saint Paul Code of Ordinance Chapter 293 Section 07, which limits construction noise in residentially zoned districts to 65 decibels A (dBA) between the hours of 7:00 am and 10:00 pm, and 55 dBA between the hours of 10:00 pm and 7:00 am.

Operational Noise

The City of Saint Paul and Minnesota Pollution Control Agency regulate noise. The proposed projects will potentially contribute to the existing campus noise. Further noise evaluation will be completed as design progresses and best practices to reduce noise spill will be considered. For the Arena, this includes placement of speakers and other sound systems within the building and the design of the building wall systems. Rooftop equipment placed adjacent to masonry screen walls wherever possible to use the building mass to absorb air vibration around them. Equipment sized to avoid exceeding its operational limit, thus allowing the equipment to be quieter. For the Microgrid Project, this includes the building wall systems and screen walls around exterior mechanical equipment. The facilities will be required to comply with local and state noise regulations. If the facilities exceed noise regulations, the project proposer will work with the city to identify potential mitigation options. As with any other entity, it is also possible for the project proposer to seek noise-level variances for special events, which would be reviewed by the Saint Paul City Council through existing procedures.

20. Transportation

- a. Describe traffic-related aspects of project construction and operation. Include 1) existing and proposed additional parking spaces; 2) estimated total average daily traffic generated; 3) estimated maximum peak hour traffic generated and time of occurrence; 4) source of trip generation rates used in the estimates; and 5) availability of transit and/or other alternative transportation modes.**

In June 2023, SRF Consulting Group, Inc. (SRF) prepared a Transportation Study for the project site (*2023 EAW Transportation Analysis*; see Appendix D of the 2023 EAW, which is included in Appendix E of this EAW Update). An Addendum (*2024 EAW Update Transportation Analysis Addendum*) to the 2023 EAW Transportation Analysis is included in Appendix D of this 2024 EAW Update to update and supplement the 2023 EAW Transportation Analysis. The combination of the 2023 EAW Transportation Analysis and the

2024 EAW Update Transportation Analysis Addendum are herein referred to as the Traffic Analysis.

Parking

Two surface parking lots (Lots M and P1) were either fully or partially removed during the Schoenecker Center project construction, resulting in a loss of approximately 129 parking spaces. Eleven parking spaces were reconstructed as a part of the Schoenecker Center project, resulting in a net loss of 118 parking spaces. Several surface parking lots (Lots N, O, P1, V, X, and Y) were either fully or partially removed during the Arena project construction, resulting in a loss of approximately 307 parking spaces. Lot O is expected to be reconstructed during the Arena project implementation to provide 46 surface parking spaces and Lot Y is expected to be reconstructed to provide 14 surface parking spaces, resulting in a total net loss of 247 surface parking spaces. Between the Arena and Schoenecker Center projects, a total of 365 parking spaces were removed from the UST South Campus. The Microgrid Project will not displace or add any parking spaces. If the SPS Parking Lot project is completed, it is anticipated to add approximately 73 surface parking spaces to the SPS property.

The proposed developments require the creation of a Transportation Demand Management Plan under Saint Paul Zoning Code Sec. 63.122. The TDM process was followed for the Schoenecker Center and Arena projects and were included in the final site plan approvals for each project.

Traffic Generation

An existing pre-event and post-event peak hour trip generation was estimated for a maximum capacity event at the project site, which would be an event held in the Arena, based on assumptions that were discussed and reviewed by UST and City of St. Paul throughout the study process. Total pre-event peak hour generates approximately 1,498 trips and post-event peak generates approximately 1,581 trips.

Pedestrians and Bicycles

The project site is currently served with sidewalks and all signalized intersections surrounding the University of St. Thomas campus are programmed with leading pedestrian interval timing, which helps improve pedestrian safety. A sidewalk gap existed on the north side of Goodrich Avenue adjacent to the University of St. Thomas property at the time of the 2023 EAW. This sidewalk gap has since been filled between Cretin Avenue and the UST Binz access drive, but a gap still exists between the UST Binz access drive and Mississippi River Boulevard. Sidewalk does not exist along the east side of Mississippi River Boulevard adjacent to the west edges of the UST and SPS properties.

An off-street bicycle trail is located along Mississippi River Boulevard, west of the project site. On-street bicycle lanes are located along Summit Avenue and Cleveland Avenue to the north and east of the project site.

Transit Service

Several Metro Transit stops are located on or near the University of St. Thomas campus. Metro Transit Bus Routes 21, 63, and 87 serve the vicinity of the project site.

Route 21 provides service between the Uptown Transit Station and downtown Saint Paul, and Route 63 provides service between western Saint Paul and downtown Saint Paul. Both Routes 21 and 63 operate seven days a week and are part of Metro Transit's High Frequency Network, with approximately 15-minute headways during peak hours on the weekdays and Saturdays. Service during nights and on Sundays provides 15 to 30 minute headways. Route 87 is a local bus route between Saint Paul and Roseville. It operates seven days a week with 30-minute headways during peak hours on the weekdays and 1-hour headways during nights and on the weekends.

Additionally, the University of St. Thomas provides a shuttle bus between the Saint Paul campus and the Minneapolis campus, is free for staff and students, and runs every 20-30 minutes on weekdays from 6:00 am to 5:30 pm. A shuttle bus is run in the evenings starting at 6:00 pm and stops once per hour at each campus. Shuttle service is reduced during the January Term (J-Term) and summer months. There is no shuttle service on weekends and holidays.

- b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. *If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: <http://www.dot.state.mn.us/accessmanagement/resources.html>) or a similar local guidance.***

The 2023 EAW Transportation Analysis found that the Arena project was expected to displace approximately 173 vehicles during peak non-event times at the University of St. Thomas. It is important to note that the loss of the parking spaces as a result of the Schoenecker Center construction project was already accounted for in the existing parking counts, as these counts were collected after the parking lots had been removed. Despite this, the other non-resident parking lots and on-street parking (no permits required) were expected to accommodate the displaced vehicles and have a surplus of 86 parking spaces. As part of the 2024 EAW Transportation Analysis Update Addendum, recent parking counts collected by UST were reviewed to assess parking changes on campus. Since on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum, the review was focused on the visitor parking facilities, as these are the facilities expected to be used for events held in the Arena. The results indicate a greater parking supply in the visitor facilities than previously expected, during both non-event and event times. Given that the parking permits have remained relatively unchanged, the discrepancy in parking supply is likely due to the reopening of Lot A, which was previously closed for a construction project, and increased telecommuting and online class availability.

An event parking demand analysis was completed that maintains the assumptions, available parking supply, and parking demand estimates from the 2023 EAW Transportation Analysis, while incorporating two key updates: correcting a previously inaccurate recording of available adjacent on-street parking supply and accounting for the reduced student seating in the current Arena design from 22 to 20 percent. The tables below include detailed breakdowns for both men's and women's sporting events as well as by attendance intervals,

reflecting current attendance and frequency projections. Key findings indicate that approximately 54 of the 66 anticipated sporting events are expected to have a parking surplus, without any mitigation measures. Of the 12 games where a parking deficit is expected, 9 are expected to only have a deficit of 35 spaces. Those 9 events would no longer be expected to have a parking deficit if the SPS Parking Lot project is constructed, as the seminary users that are parking within University parking areas would be able to park within the SPS Parking Lot and free up University parking spaces for event parking. Events with parking deficits of over 100 vehicles are only expected to occur 1-3 times per year, if at all. Overall, without further mitigation, campus and nearby on-street parking adjacent to campus can generally accommodate events up to 2,600 attendees on weeknights and 3,900 attendees on weekends (Friday through Sunday). See Tables 4 and 5 from the 2024 EAW Transportation Analysis Update Addendum included in Appendix D, copied below as Tables 13 and 14, for further information on assumptions used to derive expected parking demand.

Table 13: Event Parking Demand Analysis by Event Type (No Mitigation)

	Estimated Attendance	Estimated Parking Surplus/Deficit ⁽¹⁾ ⁽²⁾ ⁽³⁾		
		Thursday/Weekday Night	Friday Night	Saturday Night
<i>Average Attendance</i>				
M Hockey	3,600	-- ⁽⁴⁾	70	209
W Hockey	550	533	873	1,012
M Basketball ⁽⁵⁾	1,800	204	544	683
W Basketball ⁽⁵⁾	1,175	369	709	848
<i>Maximum Attendance</i>				
M Hockey	4,000	-- ⁽⁴⁾	-35	104
M Basketball	5,500	-770	-430	-291
W Basketball	3,000	-112	228	367

Table 14: Event Parking Demand Analysis by Attendance (No Mitigation)⁽¹⁾⁽²⁾⁽³⁾

Attendance		Thursday/Weekday Night		Friday Night		Saturday Night	
Range	For Parking Analysis	Estimated Number of Games ⁽⁶⁾	Parking Surplus/ Deficit	Estimated Number of Games ⁽⁶⁾	Parking Surplus/ Deficit	Estimated Number of Games ⁽⁶⁾	Parking Surplus/ Deficit
5,500 - 4,500	5,500	1	-770	0	-430	1	-291
	5,000		-639		-299		-160
	4,500		-507		-167		-28
4,499 - 3,500	4,000	0	-375	9	-35	10	104
	3,500		-244		96		235
3,499 - 2,500	3,000	1	-112	0	228	1	367
	2,500		20		360		499
2,499 - 1,000	2,000	8	151	0	491	9	630
	1,500		283		623		762
	1,000		415		755		894
Less than 1,000		5	>415	9	>755	12	>894
Attendance Threshold/ # Games with Deficit		2	2,575	9	3,870	1	4,395

- (1) UST players and coaches and event/vendor staff are expected to park in reconstructed Lot O or other commuter and faculty/staff lots within campus, and not in parking facilities used for event patrons.
- (2) As mentioned previously, the current designs indicate a capacity for men's basketball of 5,324. This reduction in capacity is expected to reduce parking demand by approximately 45-60 vehicles, which is not reflected in these numbers.
- (3) If the SPS Parking Lot is completed, available parking supply is expected to increase by approximately 40 to 70 spaces, depending on the night, which is not reflected in these numbers.
- (4) Men's Hockey games are expected to occur on Friday and Saturday nights only.
- (5) Note average attendance men's and women's basketball games are already occurring on campus.
- (6) Based on expected Hockey and Basketball attendance projections and schedules published within the 2023 EAW Transportation Analysis and this addendum.

An intersection capacity analysis was conducted to determine how traffic is expected to operate during pre-event peak hour and post-event peak hour times. Capacity analysis results identify a level of service (LOS) which indicates how well an intersection is operating. Intersections are graded from LOS A (indicates best traffic operation) through LOS F (indicates an intersection where demand exceeds capacity) and are based on average delay per vehicle. Overall intersection LOS A through LOS D is generally considered acceptable in the Twin Cities Metropolitan Area, although longer delays for short periods of time and/or for specific movements are often considered acceptable as well.

Based on the intersection capacity analysis, multiple areas were identified for further consideration. Mitigation strategies for traffic congestion and event management are further discussed in Section 20.c. below. Existing conditions of intersection capacity, 2025 maximum capacity pre-event and post-event intersection capacity, and 2025 maximum capacity pre- and post-event capacity with mitigation strategies are provided in Table 15 below.

Table 15: LOS Summary

Intersection	Existing Conditions				2025 Build Maximum Capacity Event Conditions			
	AM Peak Hour		PM Peak Hour		Pre-Event		Post-Event	
	LOS	Delay s/veh (typ)	LOS	Delay s/veh (typ)	No Mitigation	Mitigation	No Mitigation	Mitigation
Cretin Ave S / Marshall Ave	C	26	D	53	C	D	C	C
Cretin Ave S / Selby Ave	A/A	10	A/B	11	A/E	B/F	A/C	A/C
Cretin Ave S / Mississippi River Blvd	A/A	5	A/A	6	A/D	A/D	A/A	A/D
Cretin Ave S / Summit Ave	A	8	B	14	D	D	D	C
Cretin Ave S / Grand Ave	B	10	B	14	E	D	F	D
Cretin Ave S / Goodrich Ave	A/A	9	A/C	16	B/F	A/F	A/C	A/C
Cleveland Ave S / Selby Ave	A/A	6	A/B	12	A/A	A/A	A/A	A/A
Cleveland Ave S / Summit Ave	B	13	B	19	B	B	B	B
Cleveland Ave S / Grand Ave	B	15	B	15	B	B	B	B
Mississippi River Blvd / Summit Ave	A/A	4	A/A	5	A/A	A/A	A/A	A/A
Mississippi River Blvd / Goodrich Ave	A	4	A	4	A	A	A	A

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

UST understands that a certificate of occupancy for the Arena will not be issued until such time as there is substantial conformance with implementation of or documented plans for the following mitigation measures have been submitted and accepted.

Infrastructure

UST submitted a site plan application for the Arena on September 6, 2023, which received final approval on April 4, 2024. As part of this process, SRF prepared the “APF Access Addendum” to address changes in pedestrian access assumptions since the 2023 EAW Transportation Analysis and provided additional recommendations. A summary of the infrastructure requirements as part of the site plan approval process, some of which may be considered mitigation for the project, are shown below:

- Construct a new traffic signal at the Cretin Avenue/Grand Avenue intersection. As part of construction, the signal cabinet will be relocated, and the pedestrian facilities will be widened on the northwest quadrant and along the north side of the private portion of Grand Avenue to accommodate event pedestrian demand.
- Construct curb extensions at the Cretin Avenue/Grand Avenue intersection to improve pedestrian safety.
- Construct a southeast Cretin Avenue access into south campus, with gate arm protection, for service vehicles, emergency vehicles, and potential shuttle/bus services.

Event Management Plan

An event management plan continues to be a recommended mitigation measure through the 2024 EAW Transportation Analysis Addendum. An event management plan (EMP) is a comprehensive plan designed to minimize transportation impacts and enhance safety and efficiency during events, incorporating input from stakeholders to finalize and adjust mitigation strategies. It is continuously updated based on real-world experiences and feedback, with UST planning to collaborate with city partners and actively engage neighborhood associations to ensure effective community communication and build consensus. The analysis completed for an EAW typically analyzes the maximum event to consider the worst-case conditions, but an EMP looks at multiple levels of events in order to fit mitigation measures to each scale of event.

Traffic Management/Safety

Several event management recommendations, which are summarized below, are proposed to minimize pedestrian/vehicular conflicts, enhance pedestrian safety, and reduce event-related congestion. These strategies are expected to be updated within the event management plan to align specific mitigation measures with corresponding attendance levels and will be refined based on actual event operations and experiences.

- Employ Traffic Control Officers at Cretin Avenue/Grand Avenue and/or Cretin Avenue/Summit Avenue
- Implement event-specific signal timing plans at strategies signalized intersections
- Assign parking attendants at designated event parking facilities
- Designate pedestrian routes and provide wayfinding campus-wide
- Implement sidewalk closures and provide pedestrian wayfinding along Grand Avenue (near the arena and APF)
- Implement an alternative access solution to the Arena from APF (i.e. skyway or vertical circulation element) if event operations/pedestrian conflicts are determined to be problematic by the city

Parking

Despite an expected parking surplus for most Arena events without mitigation, parking mitigation strategies are recommended for events over the attendance thresholds identified within the Traffic Analysis (i.e., 2,575 on a weeknight, 3,870 on a Friday, 4,395 on a Saturday).

These strategies are expected to reduce parking demand on campus, improve mobility, and minimize community impact. Each recommendation is expected to be tied to a specific attendance level and refined as part of the event management plan and as actual events occur at the Arena.

- **Pre-Paid Event Tickets & Parking Assignment:** Continue to use (UST already uses for athletic events) and further encourage online ticket purchases with options for designated parking passes or alternative transportation information. This minimizes the need to circle campus lots and serves as a platform to inform users about potential alternative transportation options and incentives such as free transit, discounted rideshare, and alternative shuttle services, which are discussed below. If event patrons are aware that all lots are full in advance, they may be more inclined to utilize transit/rideshare or carpool rather than look for parking and/or walking further distances.
- **Permit Modifications & Parking Ramp Restrictions:** Implement time-of-day restrictions and/or “no park” days at visitor parking facilities to ensure event patrons have reserved spaces in their designated ramps. Additionally, the University plans to reduce resident parking permits in Morrison Hall, reallocating those spaces so they can be cleared during events and weekends. The combination of these strategies is expected to increase parking availability by 150 to 405 spaces, depending on the night. The number of parking facilities cleared will be dependent on the expected attendance at each event and will be further defined as part of the event management plan. This strategy has been used successfully by UST in the past for athletic and other campus events. To avoid shifting students/staff parking to the public streets, the strategy should be paired with early communications and clear notification prior to enforcing the event parking restrictions in UST facilities. Online classes/telecommuting should also be promoted simultaneously to ensure that the strategy is effective. One of the visitor ramps is expected to remain available for commuting students/staff under all event scenarios, ensuring at least one parking option is available while event activities are underway.
- **Free Transit Passes:** Work with Metro Transit to offer free transit pass options with the purchase of event tickets, which is estimated to reduce demand by 10 to 30 vehicles. UST has had preliminary discussions with Metro Transit which has suggested that distributing free pass options through the online ticketing system appears to be feasible, although further evaluation of the details is needed through the event management plan.
- **Discounted Rideshare:** Partner with a rideshare company to provide discounted rates for ticket holders, which is estimated to reduce demand by 25 to 50 vehicles. Preliminary discussions with two rideshare companies have indicated that discounted rates can be easily implemented, although further evaluation of the details is needed through the event management plan.
- **Restaurant/Bar Shuttle Service:** Collaborate with local establishments to offer shuttle services, which is estimated to reduce demand by 25 to 75 vehicles. UST has had preliminary discussions with potential locations who have an interest in

establishing a partnership, although further evaluation of the details is needed through the event management plan.

- **Avoid Other On-Campus Events:** Avoid scheduling other on campus events during larger arena events to prevent increased parking demand/impacts. This should be done for sporting events with attendances of 2,100 or greater.

With these strategies, parking supply/demand is expected to improve as follows, with the improvements summarized in Table 16 as well:

- **Thursday/Weeknight:** 465 to 560 additional parking spaces/vehicle reduction
- **Friday Night:** 240 to 335 additional parking spaces/vehicle reduction
- **Saturday Night:** 210 to 305 additional parking spaces/vehicles reduction

Table 16: Event Parking Demand Analysis for Maximum Events (With Mitigation)

	Estimated Frequency	Deficit/Surplus ⁽²⁾		
		No Mitigation	With Mitigation	
			Low	High
Thursday/Weekday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-770	-305	-210
Max Women's Basketball (3,000)	0	-112	353	448
Friday Night Event				
Max Men's Hockey (4,000)	9	-35	205	300
Saturday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-291	-81	14
Max Men's Hockey (4,000)	9	104	314	409
Max Women's Basketball (3,000)	1	367	577	672

(1) As mentioned previously, the current designs indicate a capacity for men's basketball of 5,324. This reduction in capacity is expected to reduce parking demand by approximately 45-60 vehicles, which is not reflected in these numbers.

(2) If the SPS Parking Lot is completed, available parking supply is expected to increase by approximately 40 to 70 spaces, depending on the night, which is not reflected in these numbers.

Even with the mitigation measures, maximum basketball events are expected to have a parking deficit of 200 to 300 vehicles on a weeknight. Note these games are expected to only occur once or twice a year, if at all. For attendances over 4,350 on a weeknight, 4,775 on a Friday night, or 5,200 on a weekend (when deficits are expected with mitigation), it is recommended that UST provides off-site parking and shuttle services to address the parking deficit. UST has had preliminary discussions with Allianz Field to utilize their parking lot for shuttle services, which has sufficient available parking to accommodate the deficits, although further evaluation of the details is needed through the event management plan.

Table 17: Attendance Thresholds (With Mitigation)

Day/Night	Attendance Thresholds		
	No Mitigation	With Mitigation	
		Low	High

Thursday/Weeknight Event	2,575	4,350	4,700
Friday Night Event	3,870	4,775	5,125
Saturday Night Event	4,395	5,200	5,550

= To be conservative, use the low effectiveness threshold for determining when off-site parking/shuttle services should be provided.

21. Cumulative Potential Effects

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

Cumulative potential effects are defined as “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.”²⁹ The geographic areas considered for cumulative potential effects are those near the project site (within approximately one-half mile), and the timeframe considered includes projects that would be constructed in the past and in the reasonably foreseeable future.

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

According to the City of Saint Paul Downtown Projects Map interactive viewer,³⁰ there are three reasonably foreseeable projects within approximately one-half mile of the project site in addition to the projects already discussed throughout the document above. A sidewalk project along Cleveland Avenue from Summit Avenue to Marshall Avenue is scheduled for 2024. A traffic signal project is scheduled at the intersection of Cretin Avenue and St. Clair Avenue for 2024. Lastly, the B Line bus rapid transit alignment is planned along Marshall Avenue.

The St. Paul Seminary intends to construct a surface parking lot along Mississippi River Boulevard to the west of the University of St. Thomas South Campus in 2024 or 2025. The SPS Parking Lot is addressed throughout this document.

St. Thomas may be required to close the service drive into the South Campus parcel from Goodrich Avenue, which is located south of the Arena project site and primarily used for service deliveries and emergency access to Binz Refectory, Grace Hall and Brady Education Center. In May 2024, a complaint was filed with the City alleging that St. Thomas violated its conditional use permit (CUP) by not closing the service drive from Goodrich Avenue when it remodeled the Binz Refectory in 2022 and 2023. City staff issued an enforcement notice that

²⁹ Minnesota Rules, part 4410.0200, subpart 11a

³⁰ Available at

https://experience.arcgis.com/experience/99bea6f90c4a409a8a64fff81dee30e7/page/Overview/?data_id=dataSource-5-17cc347089c-layer-15%3A238

the CUP required St. Thomas to close the drive. This matter will be scheduled for a hearing before the Planning Commission to determine next steps, including whether the drive should be closed or the CUP should be modified; enforcement is stayed at this time. If required, closing the Goodrich service drive will have minimal cumulative impacts. It will have no change in access, parking, or operations for the Arena, Schoenecker Center, Microgrid Project, or SPS Parking Lot projects. Service and emergency vehicle access to Binz Refectory, Grace Hall, and Brady Education Center would occur through the Arena site from the southeast Cretin Ave access point with modifications needed between the southwest turnaround area and the existing service area south of Binz. However, such use is minimal with an estimate of 0-2 outside deliveries per week and occasional use by St. Thomas as part of general campus operation activities, such as facilities maintenance work. If the service drive is required to be closed, it is not expected to have any other environmental impacts.

The University of St. Thomas does not have any board approved plans for new building construction at the Saint Paul campus, other than the Owens Science Hall addition for the Microgrid Project already discussed throughout the document. The University of St. Thomas completed construction of the Schoenecker Center in 2024, which is already addressed throughout this document. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any other future building projects to contribute to the understanding of cumulative potential effects.

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

The identified reasonably foreseeable future projects may result in impacts to transportation, utilities, or other resources. However, potential impacts of future projects will be addressed as required by regulatory permitting and approval processes, minimizing the potential for cumulative effects.

Cumulative potential effects for the Schoenecker Center, Microgrid project and the Saint Paul Seminary parking lot have been addressed in each section of the EAW as required by EQB guidance. Updated analysis to include the Schoenecker Center, Microgrid project, and the Saint Paul Seminary parking lot is located in Item 6 through Item 16, and Item 18 through Item 20.

22. Other Potential Environmental Effects

If the project may cause any additional environmental effects not addressed by Items 1 to 21, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

All anticipated potentially adverse environmental effects are addressed in the preceding EAW items.

RGU Certification

The Environmental Quality Board will only accept **SIGNED** Environmental Assessment Worksheets for public notice in the EQB Monitor.

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The EAW describes the complete project; there are no other projects, stages, or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively,
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature

Jacob Goodman

Date

Oct 2, 2024

Title

Director

Figures

Figure 1: County Map

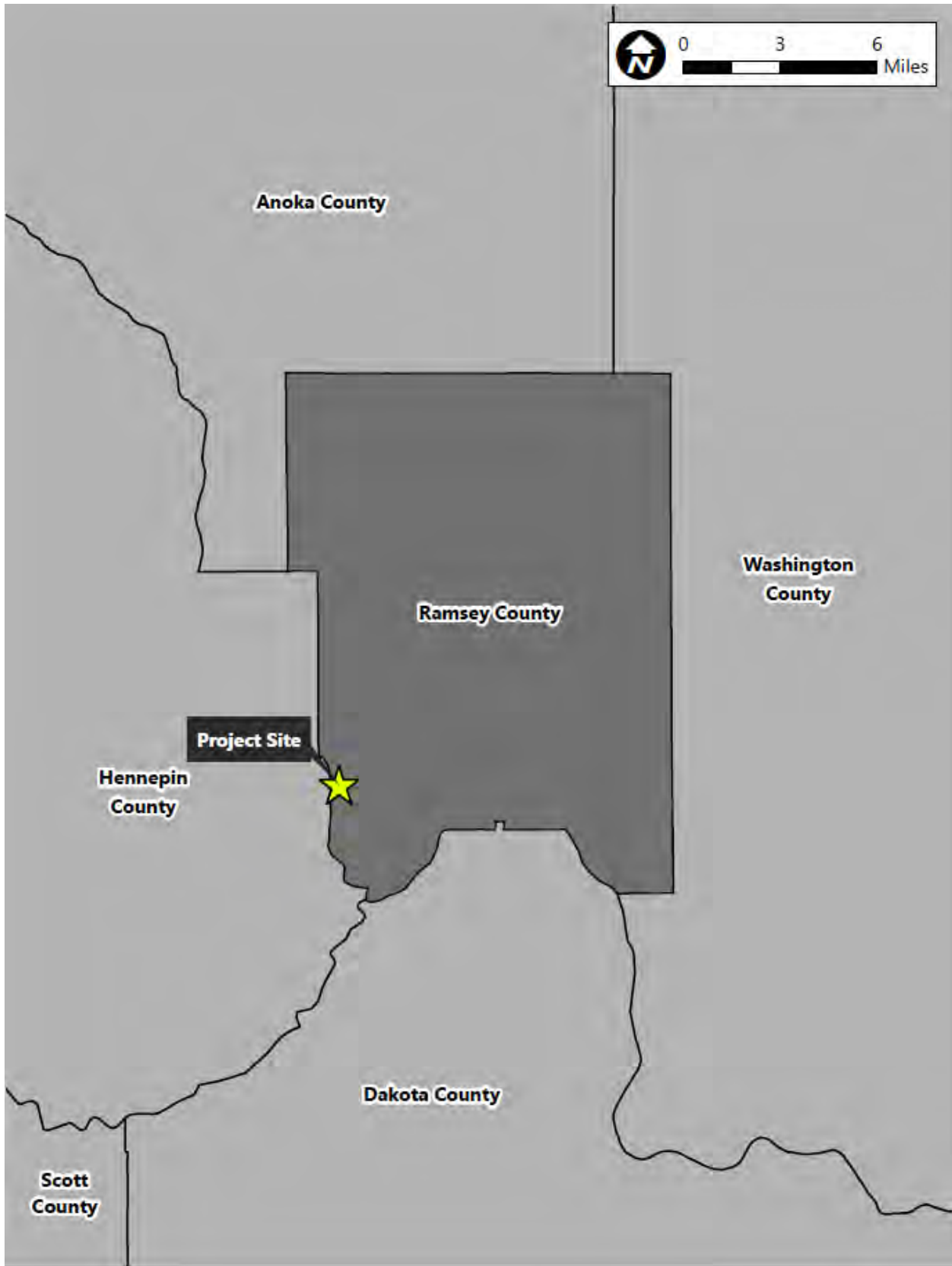


Figure 2: USGS Map

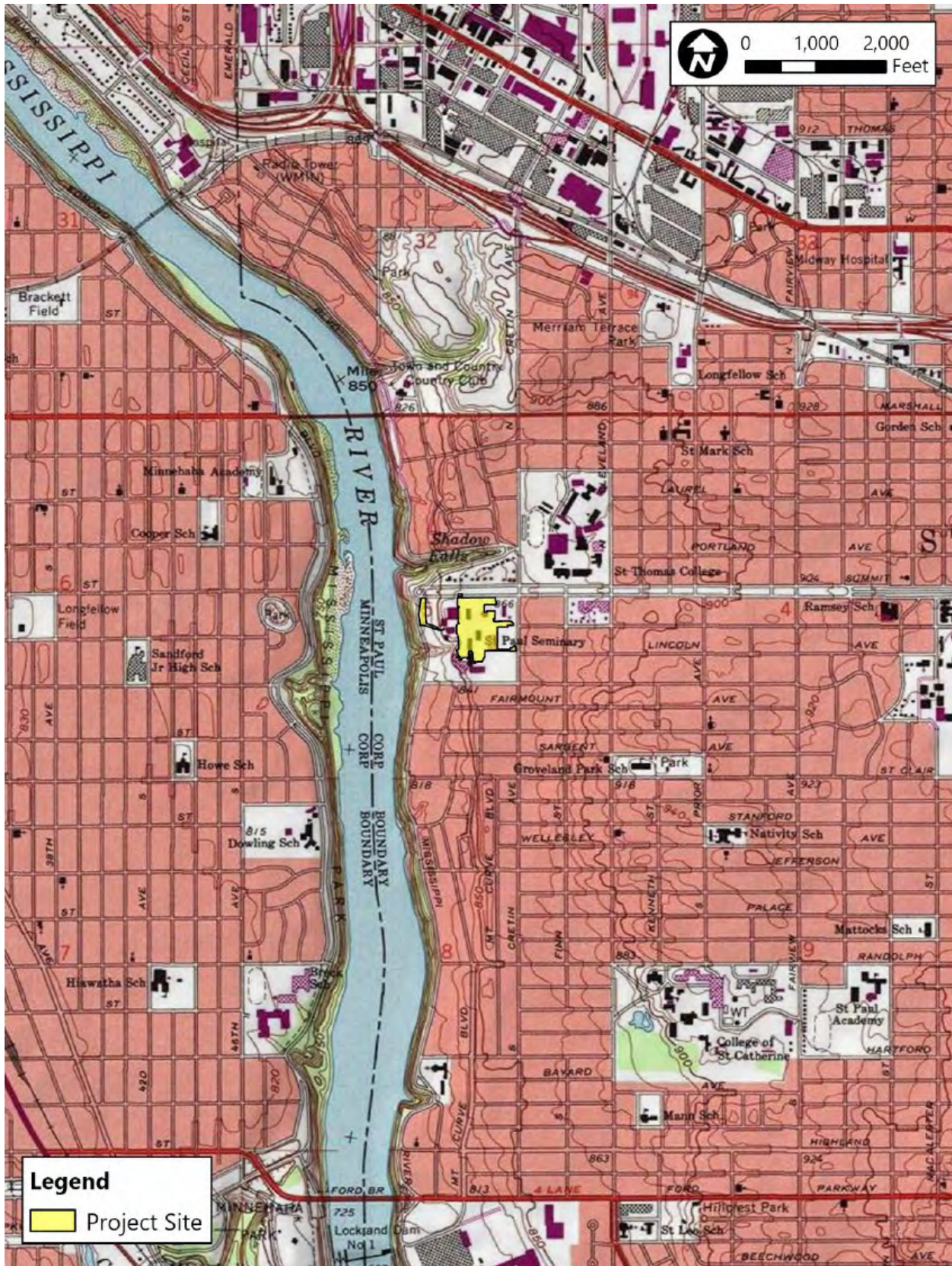


Figure 3: Existing Conditions

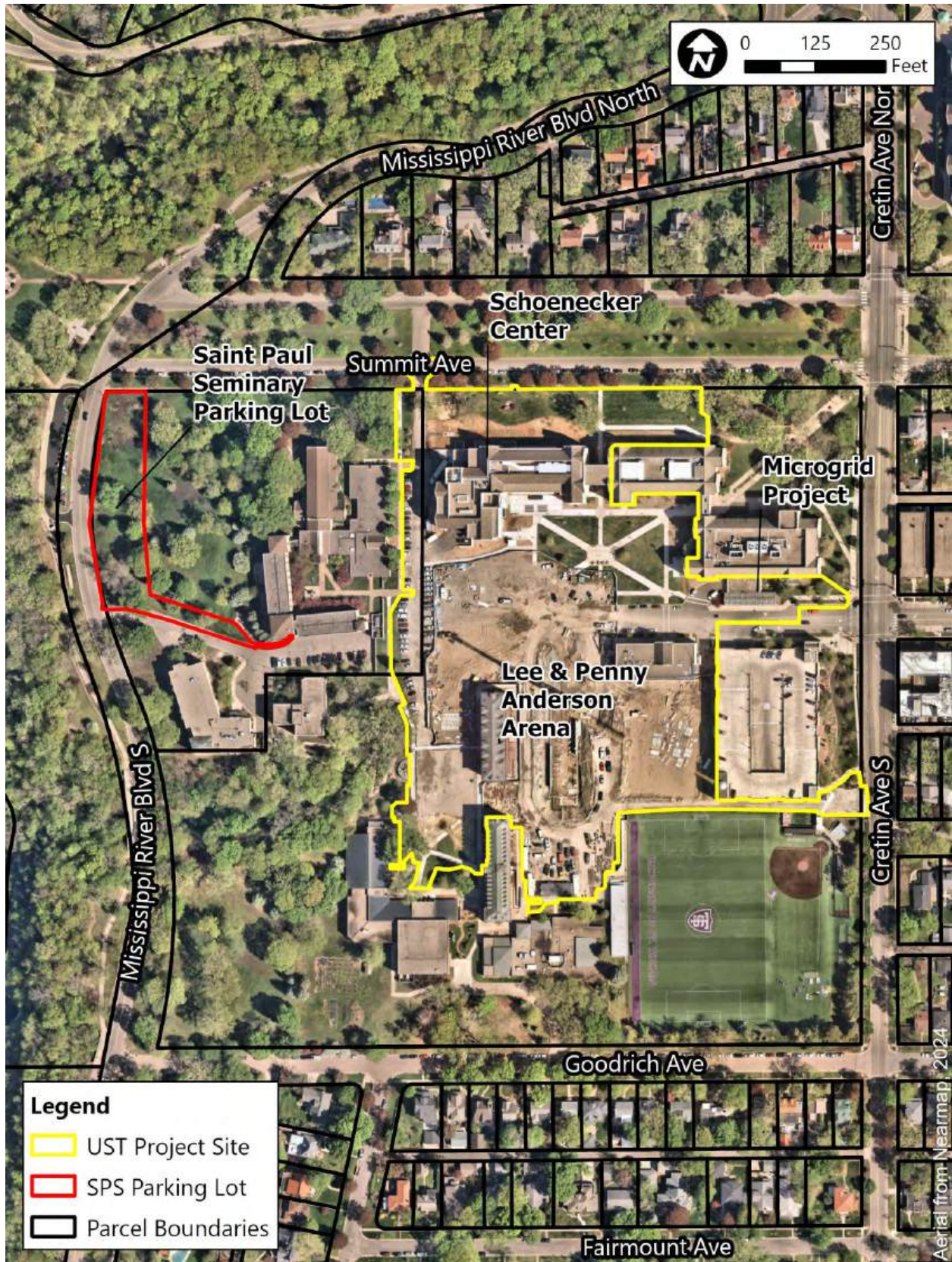


Figure 4: Existing Land Use

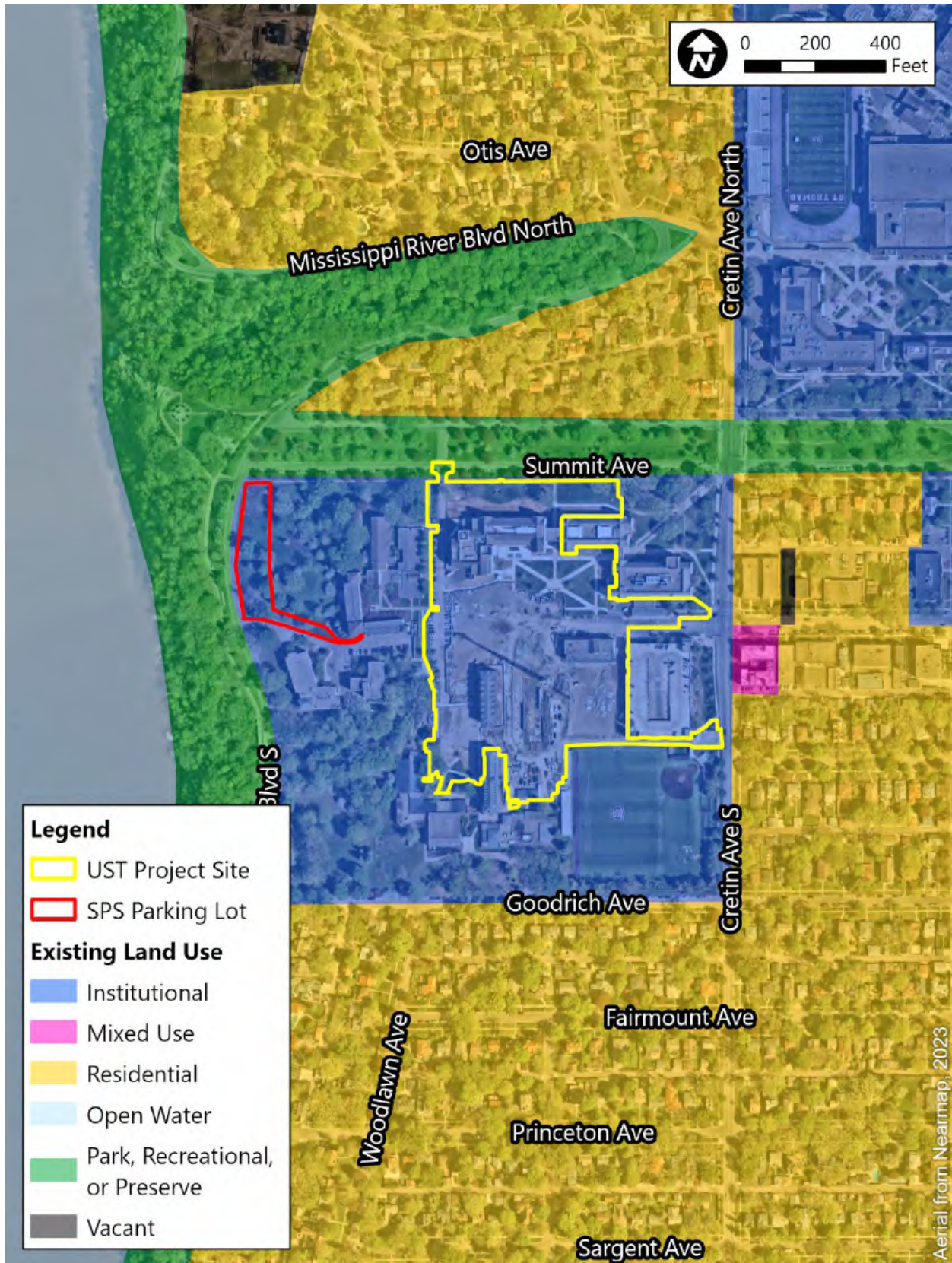


Figure 5: Existing Zoning

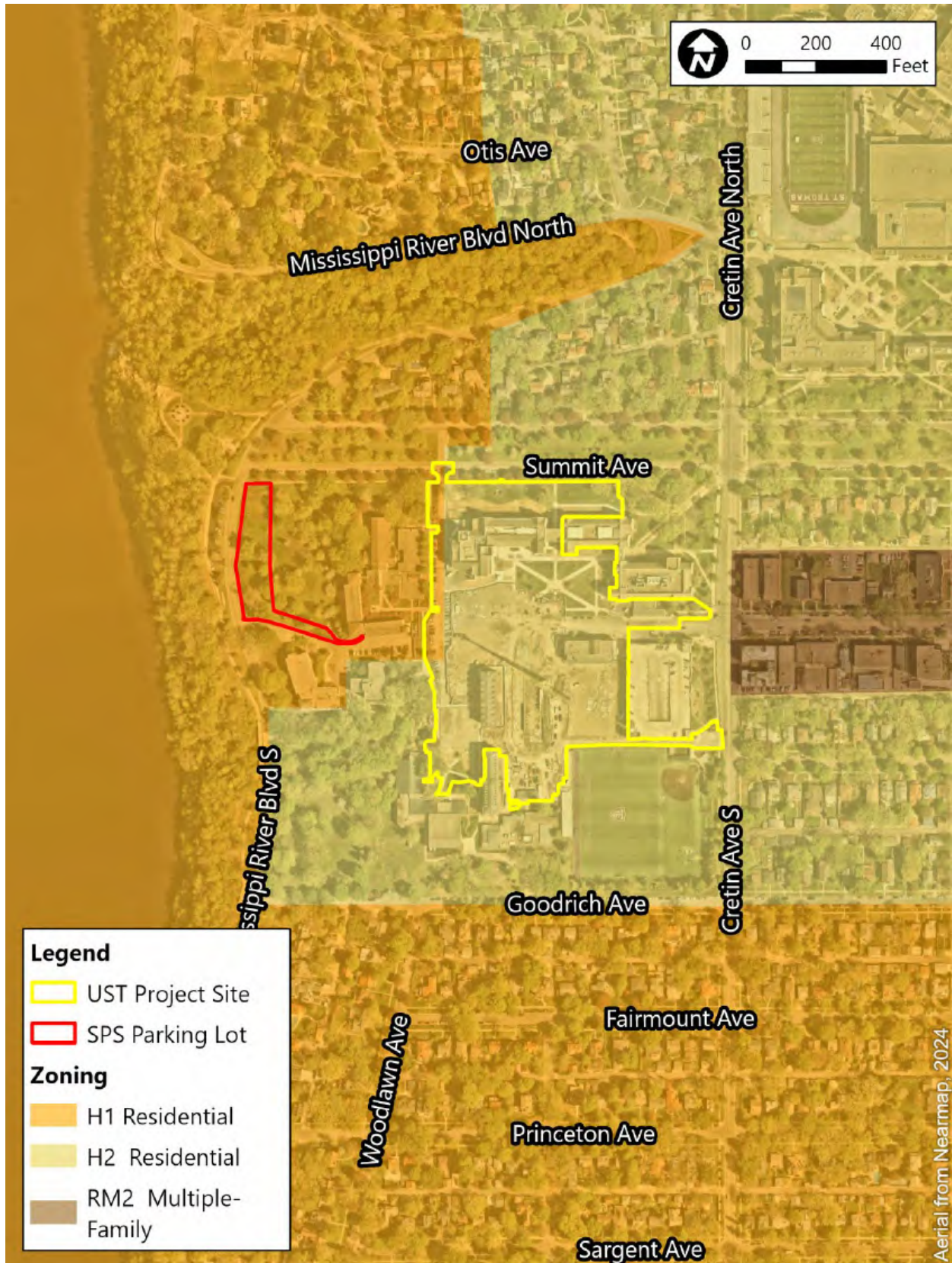


Figure 6: Zoning Overlay Districts

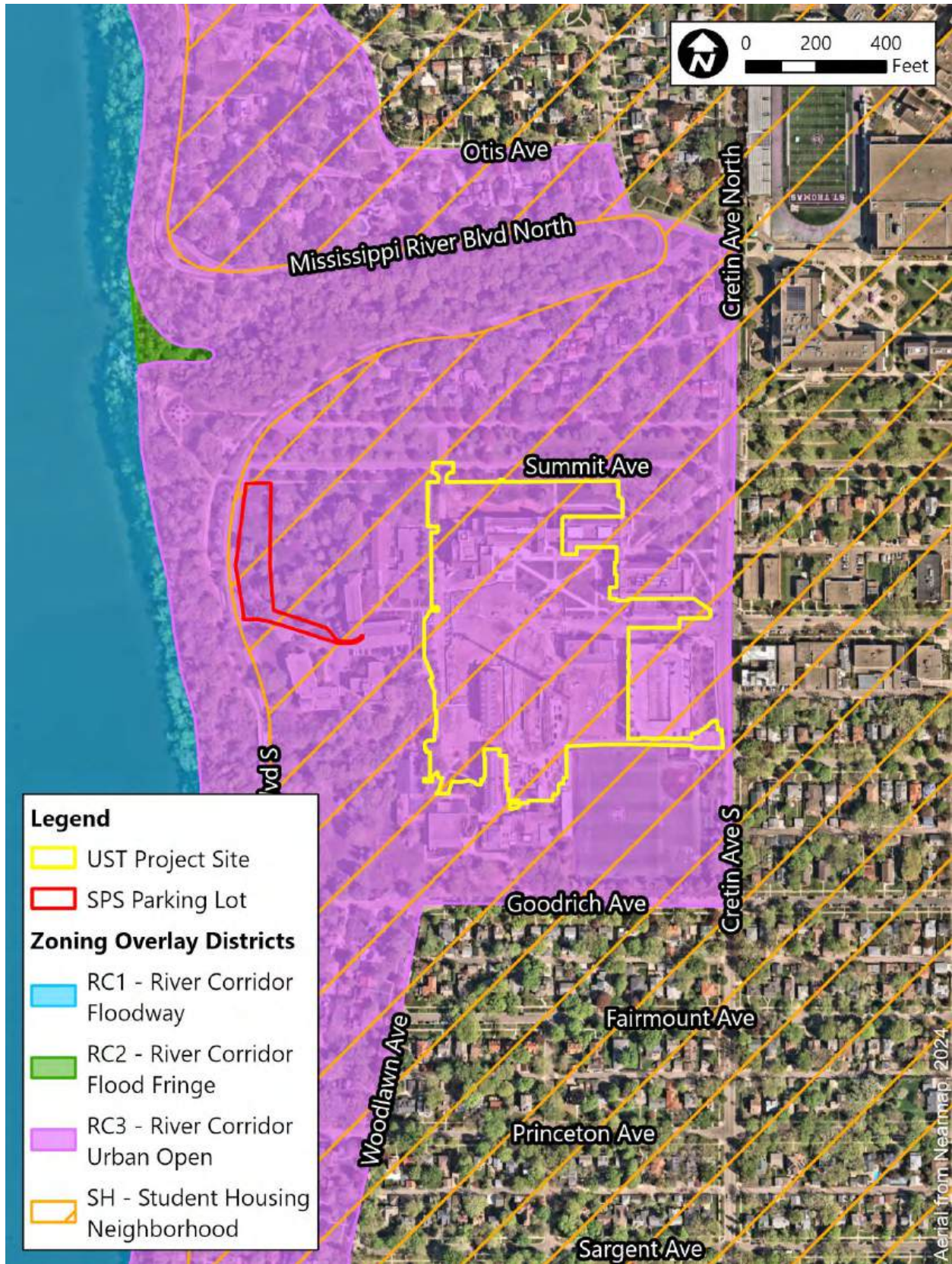


Figure 7: Water Resources

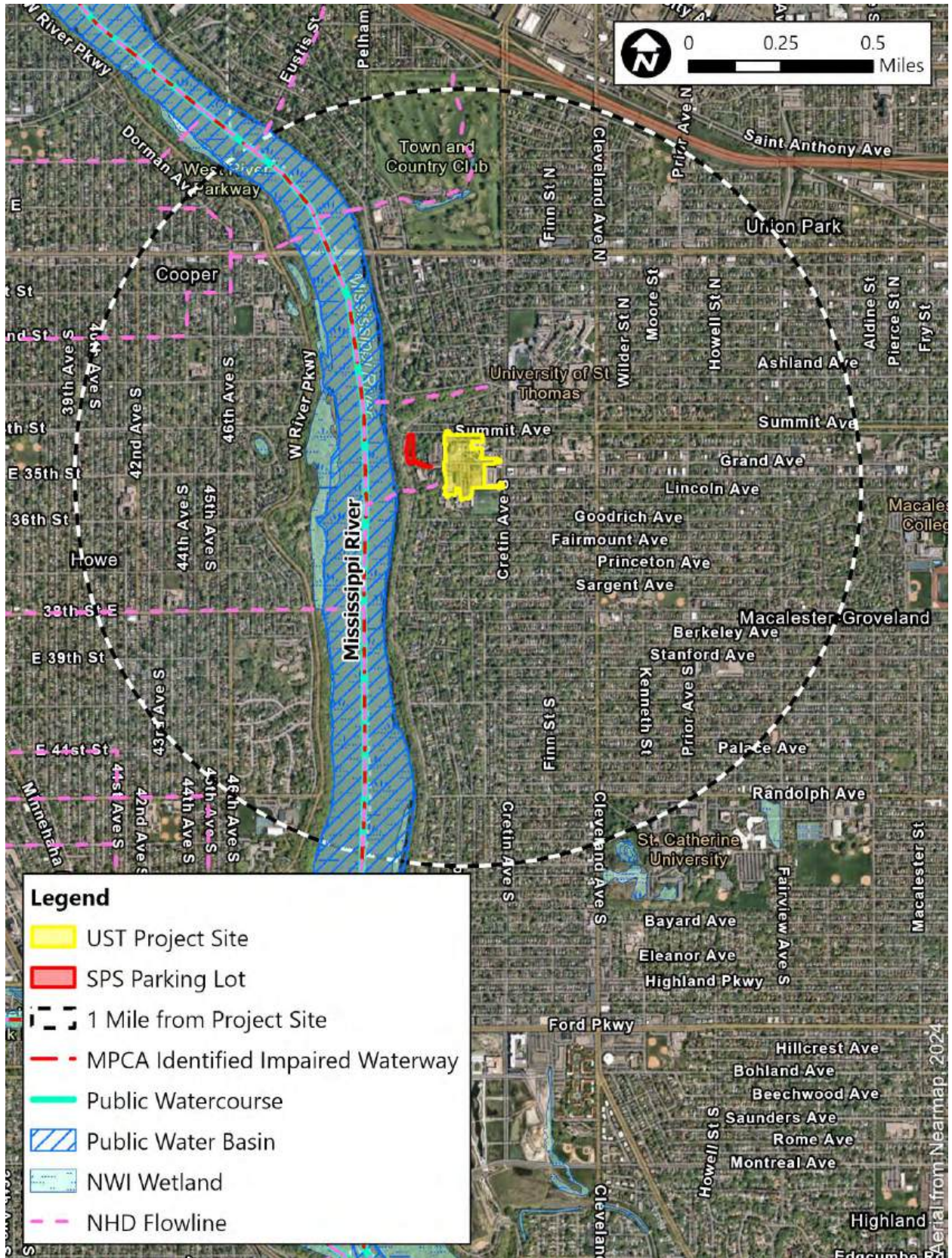


Figure 8: What's In My Neighborhood Sites Within 200 feet of the Project Site

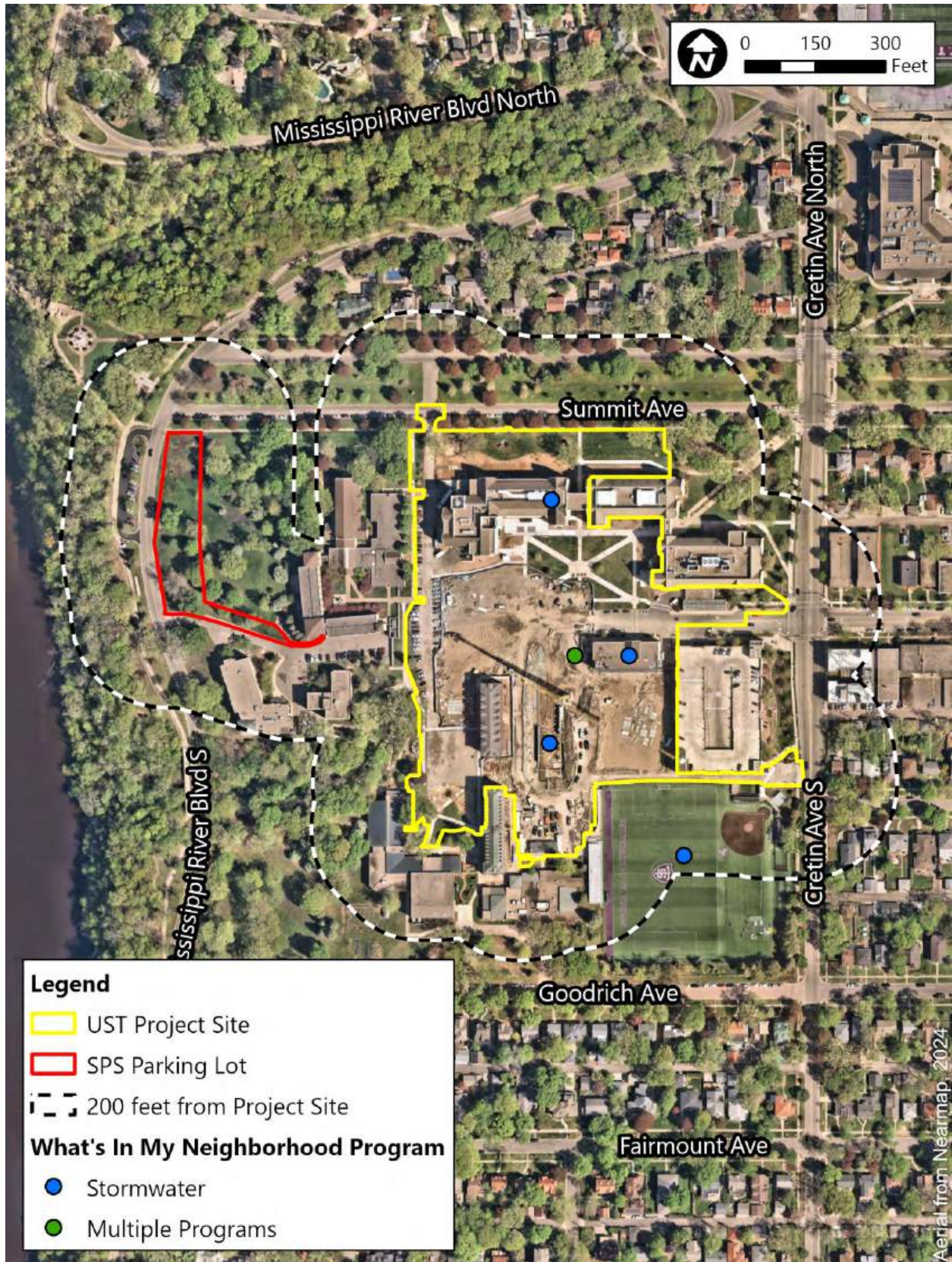
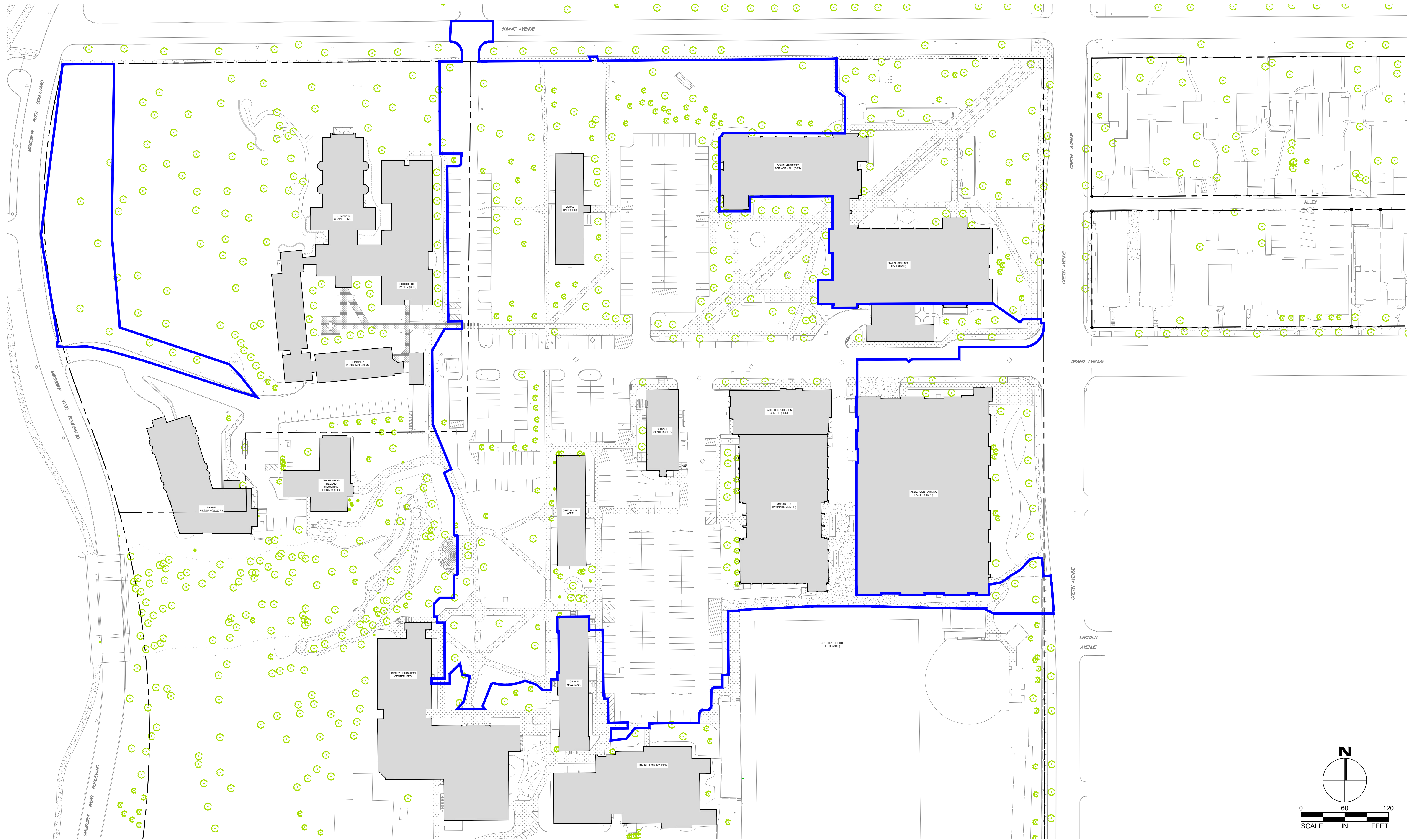


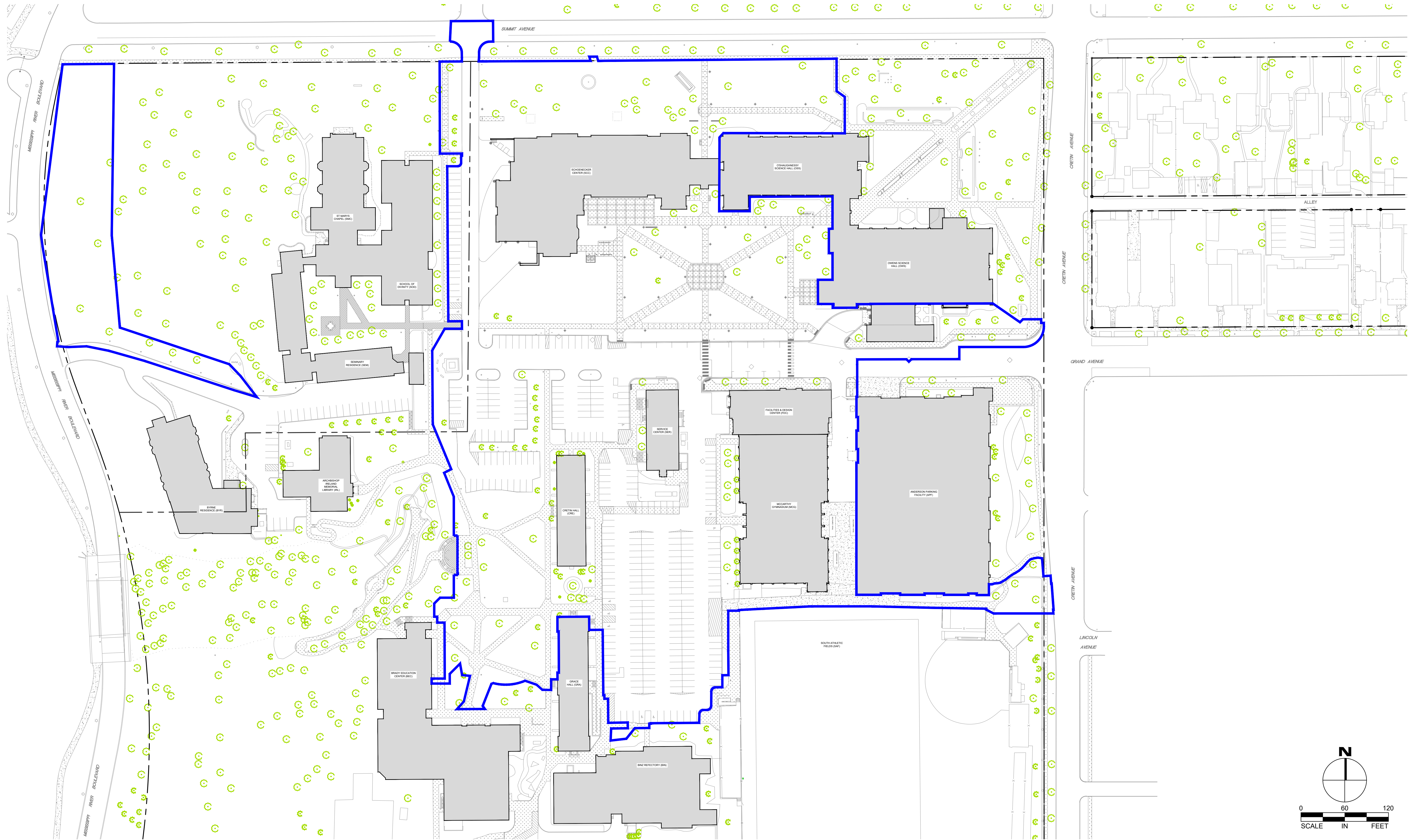
Figure 9: Historic Resources Within 500 feet of the Project Site

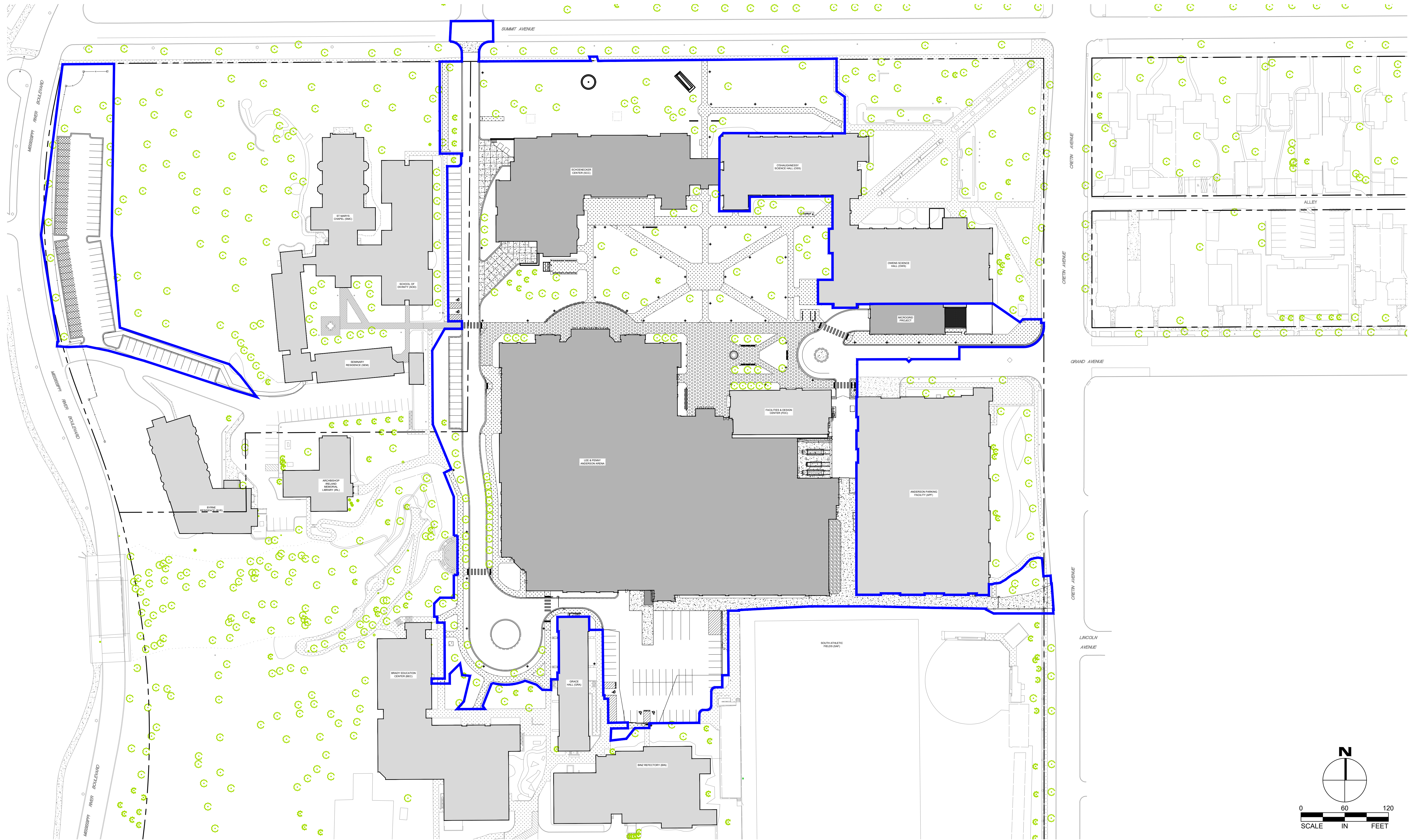


Appendix A

September 2024 Site Plans (2020, 2023, 2025)







Appendix B

September 2024 Greenhouse Gas (GHG) Analysis

Emissions Summary

Guidance

The total GHG emissions from each source category are provided below. You may also use this summary sheet to fill out the *Annual GHG Inventory Summary and Goal Tracking Form* (.xls) as this calculator only quantifies one year of emissions at a time.

<https://www.epa.gov/climateleadership/target-setting>

By entering the data below into the appropriate cell of the *Annual GHG Inventory Summary and Goal Tracking Form*, you will be able to compare multiple years of data.

If you have multiple Calculator files covering sub-sets of your inventory for a particular reporting period, sum each of the emission categories (e.g. Stationary Combustion) to an organizational total, which then can be entered into the *Annual GHG Inventory Summary and Goal Tracking Form*.

(A) Enter organization information into the orange cells. Other cells on this sheet will be automatically calculated from the data entered in the sheets in this workbook. Blue cells indicate required emission sources if applicable. Green cells indicate scope 3 emission sources and offsets, which organizations may optionally include in its inventory.

(B) The "Go To Sheet" buttons can be used to navigate to the data entry sheets.

Organizational Information:

Organization Name:	University of St. Thomas		
Organization Address:	2115 Summit Ave, St Paul, MN 55105		
Inventory Reporting Period:	Proposed Scenario		
	Start:	Jan-24	End: Dec-24
Name of Preparer:	Kimley-Horn		
Phone Number of Preparer:	763-251-1015		
Date Prepared:	Aug-24		

Summary of Organization's Emissions:

Scope 1 Emissions

Go To Sheet	Stationary Combustion	929	CO ₂ -e (metric tons)
Go To Sheet	Mobile Sources	1,328	CO ₂ -e (metric tons)
Go To Sheet	Refrigeration / AC Equipment Use	0	CO ₂ -e (metric tons)
Go To Sheet	Fire Suppression	0	CO ₂ -e (metric tons)
Go To Sheet	Purchased Gases	0	CO ₂ -e (metric tons)

Location-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	1,586	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Market-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	1,586	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Total organization Emissions

Total Scope 1 & Location-Based Scope 2	3,843	CO ₂ -e (metric tons)
Total Scope 1 & Market-Based Scope 2	3,843	CO ₂ -e (metric tons)

Reductions

Go To Sheet	Offsets	0	CO ₂ -e (metric tons)
	Net Scope 1 and 2 Location-Based Emissions	3,843	CO ₂ -e (metric tons)
	Net Scope 1 and 2 Market-Based Emissions	3,843	CO ₂ -e (metric tons)

Scope 3 Emissions

Go To Sheet	Employee Business Travel	0	CO ₂ -e (metric tons)
Go To Sheet	Employee Commuting	0	CO ₂ -e (metric tons)
Go To Sheet	Upstream Transportation and Distribution	0	CO ₂ -e (metric tons)
Go To Sheet	Waste	570	CO ₂ -e (metric tons)

Required Supplemental Information

Go To Sheet	Biomass CO ₂ Emissions from Stationary Sources	0	CO ₂ -e (metric tons)
Go To Sheet	Biomass CO ₂ Emissions from Mobile Sources	0	CO ₂ -e (metric tons)

Scope 1 Emissions from Mobile Sources

Guidance

(A) Enter annual data for each vehicle or group of vehicles (grouped by vehicle type, vehicle year, and fuel type) in ORANGE cells in Table 1. Example entry is shown in first row (GREEN Italics). Only enter vehicles owned or leased by your organization on this sheet. All other vehicle use such as employee commuting or business travel is considered a scope 3 emissions source and should be reported in the corresponding scope 3 sheets.

- Select "On-Road" or "Non-Road" from drop down box to determine the Vehicle Types available. Must select before picking vehicle type.
- Select "Vehicle Type" from drop down box (closest type available).
- Enter "Fuel Usage" in appropriate units (units appear when vehicle type is selected).
- If mileage or fuel usage is unknown, estimate using approximate fuel economy values (see Reference Table below).
- Vehicle year and Miles traveled are not necessary for non-road equipment.

(B) When using biofuels, typically the biofuel (biodiesel or ethanol) is mixed with a petroleum fuel (diesel or gasoline) for use in vehicles. Enter the biodiesel and ethanol percentages of the fuel if known, or leave default values.

Biodiesel Percent: 20%
Ethanol Percent: 80%

(C) Biomass CO2 emissions from biodiesel and ethanol are not reported in the total emissions, but are reported separately at the bottom of the sheet.

Table 1. Mobile Source Fuel Combustion and Miles Traveled

Table with 8 columns: Source ID, Source Description, On-Road or Non-Road?, Vehicle Type, Vehicle Year, Fuel Usage, Units, Miles Traveled. Includes example rows for Fleet-012, Construction Equipment, Passenger Cars, and Light Trucks.

Back to Intro

Back to Summary

Help

Help - Market-Based Method

Scope 2 Emissions from Purchase of Electricity

Guidance

The Indirect Emissions from Purchased Electricity Guidance document provides guidance for quantifying two scope 2 emissions totals, using a location-based method and a market-based method. The organization should quantify and report both totals in its GHG inventory. The location-based method considers average emission factors for the electricity grids that provide electricity. The market-based method considers contractual arrangements under which the organization procures electricity from specific sources, such as renewable energy.

- (A) Enter total annual electricity purchased in kWh and each eGRID subregion for each facility or site in ORANGE cells Table 1.
(B) If electricity consumption data are not available for a facility, an estimate should be made for completeness.
(C) Select "eGRID subregion" from drop box and enter "Electricity Purchased."

- (D) See the market-based emission factor hierarchy on the market-based method Help sheet. If any of the first four types of emission factors are applicable, enter the factors in the yellow cells marked as "<enter factor>". If not, leave the yellow cells as is, and eGRID subregion factors will be used for market-based emissions.

Help - Market-Based Method

Tips: Enter electricity usage by location and then look up the eGRID subregion for each location. If you purchase renewable energy that is less than 100% of your site's electricity, see the example in the market-based method Help sheet.

Table 1. Total Amount of Electricity Purchased by eGRID Subregion. Includes columns for Source ID, Source Description, Source Area, eGRID Subregion, Electricity Purchased, and Emissions (CO2, CH4, N2O) for both Market-Based and Location-Based methods.

GHG Emissions

Summary table for GHG Emissions showing CO2 Equivalent Emissions (metric tons) for Location-Based Electricity Emissions (1,585.5) and Market-Based Electricity Emissions (1,585.5).

Notes:

Appendix C

September 2024 Greenhouse Gas Vehicle Emissions

Modes	Event	# of vehicles/game	# of home games	Average RT miles/game**	Total Miles Driven - Cars	Conversion Factor mileage to Kg eCO2	Estimated MTeCO2
Cars (Non Student)	Max Men's Basketball	1,560	2	28	86,346	0.329552133	28.46
	Max Women's Basketball	851	1	28	23,549	0.329552133	7.76
	Max Men's Hockey	1,135	9	28	282,587	0.329552133	93.13
	Average Men's Basketball	511	13	28	183,681	0.329552133	60.53
	Average Women's Basketball	333	14	28	129,127	0.329552133	42.55
	Average Men's Hockey	1,021	9	28	254,328	0.329552133	83.81
	Average Women's Hockey	156	18	28	77,711	0.329552133	25.61
		Total		66			Total

**Average vehicle miles travelled are based on density of the season ticket holders based on zip

West: Avg distance x 2 (both directions of travel) x 7.5% (directional distribution)	46miles *0.075	3.45
North: Avg distance x 2 (both directions of travel) x 45% (directional distribution)	12miles *0.45	5.4
East: Avg distance x 2 (both directions of travel) x 17.5% (directional distribution)	39miles *0.175	6.825
South: Avg distance x 2 (both directions of travel) x 30% (directional distribution)	40miles *0.30	12
	Total	28

Appendix D

September 2024 EAW Update Transportation Analysis Addendum

To: Randy Newton, PE, PTOE
City of Saint Paul

From: Brent Clark, PE, Project Manager
Pat Corkle, PE, Senior Director

Date: September 23, 2024

Subject: *UST Multipurpose Arena EAW Transportation Analysis* – 2024 EAW Update
Transportation Analysis Addendum

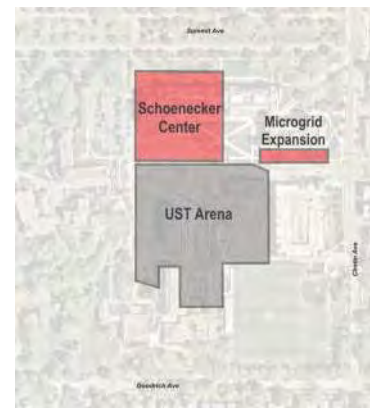
Introduction

The *UST Multipurpose Arena EAW Transportation Analysis* (hereon referred to as the *2023 EAW Transportation Analysis*) was developed by SRF Consulting Group, Inc. (SRF) in June of 2023. The opinion “*In re City of St. Paul’s Decision on the Need for an Environmental Impact Statement for the Proposed University of St. Thomas Multipurpose Arena*” filed on July 8, 2024, by the State of Minnesota Court of Appeals (COA), directed the City to develop a revised EAW that considers the Lee and Penny Anderson Arena (Arena or Project) and the Schoenecker Center to be phased actions. Therefore, the objectives of this 2024 EAW Update Transportation Analysis Addendum are to address the issues raised by the COA during the EAW court review process and to address project updates that have occurred since completion of the *2023 EAW Transportation Analysis*. This 2024 EAW Update Transportation Analysis Addendum updates and supplements the *2023 EAW Transportation Analysis*. The following information provides the assumptions, analysis, and recommendations offered for consideration to the project team and RGU.

Schoenecker Center & MicroGrid Expansion Projects

Project Information

The Schoenecker Center, located to the north of the Arena, is now the University’s central home for science, technology, engineering, arts, and math (STEAM) education. The Schoenecker Center was constructed to address a space deficit on campus to accommodate existing academic programs and included the South Campus Quadrangle outdoor plaza and greenspace area, two loading areas accessed off the western Summit Avenue access drive, utility tunnels to service various buildings on South Campus, an art gallery, and choral and instrumental rehearsal and performance spaces. Construction of the Schoenecker Center began in 2022, was completed in 2024, and the building has since been opened. One building, Loras Hall, was demolished to construct the Schoenecker Center along with two surface parking lots in Lot M and Lot P1 (partial demolition).



In addition, the University has proposed a building addition to Owens Science Hall, located northeast of the Arena, to provide new and expanded space for the Center for Microgrid Research. The Microgrid Project is proposed to further expand the University's microgrid testing and research capabilities that exist on campus. The Microgrid Project reconstructs the existing Owens Science Hall loading dock on the first level and reconstructs the University's greenhouse on the second level. Construction of the Microgrid Project is anticipated to begin in 2024 and be complete prior to the Arena opening. A portion of Owens Science Hall and an existing greenhouse will be demolished to construct the Microgrid Project.

Traffic/Parking Operations

The Schoenecker Center and the expansion of the Center for Microgrid Research are both academic building projects that accommodate existing academic programs. While both projects result in an increase in lab, classroom, office, and collaboration space, they do not necessarily correlate to additional vehicular trips or parking demand. The *ITE Trip Generation Manual, 11th Edition* and *ITE Parking Generation Manual, 5th Edition* (industry standards typically used for traffic and parking studies), only provide data linking enrollment or school population (students, faculty, and staff) to vehicular trips and parking demand on college campuses. Therefore, enrollment data at the University's St. Paul campus was the focus for assessing the traffic and parking operations of the projects, rather than changes in building square footage.

Enrollment at the University's St. Paul Campus has seen a decline over the past decade but has stabilized and been largely consistent over the last three (3) years, with enrollment in courses physically held on the St. Paul campus ranging from approximately 6,220 students in Spring 2022 to 6,290 students in Spring 2024. Since the pandemic, there have been significant advancements and opportunities for online classes and telecommuting at the University which has helped keep the enrollment in classes held on campus lower than pre-pandemic numbers. While the University aims for gradual expansion going forward, enrollment in classes held on campus is expected to remain relatively consistent through the analysis period (2025), therefore, vehicular demand is expected to remain similar to existing conditions. In addition, considering the permitted parking system on campus and the expected Arena event times (i.e. Arena events are generally held at night (~7 pm) on weekdays and not during peak times for classes, which are generally around 1 pm), any potential increase in enrollment is anticipated to have minimal impacts on event parking/operations at the proposed Arena.

Visitor Parking Data Comparison

To assess whether the opening of the Schoenecker Center has had any impact on parking, parking utilization counts collected by UST in Spring 2023 were compared to the counts collected by UST in Spring 2024. The comparison was based on occupancy of the campus visitor parking lots, as these are the facilities that are expected to be utilized for events at the Arena (refer to Figure 1 for a summary of the locations of each visitor lot). A summary of the development, construction, and parking conditions pre- and post-Schoenecker Center construction is summarized below:

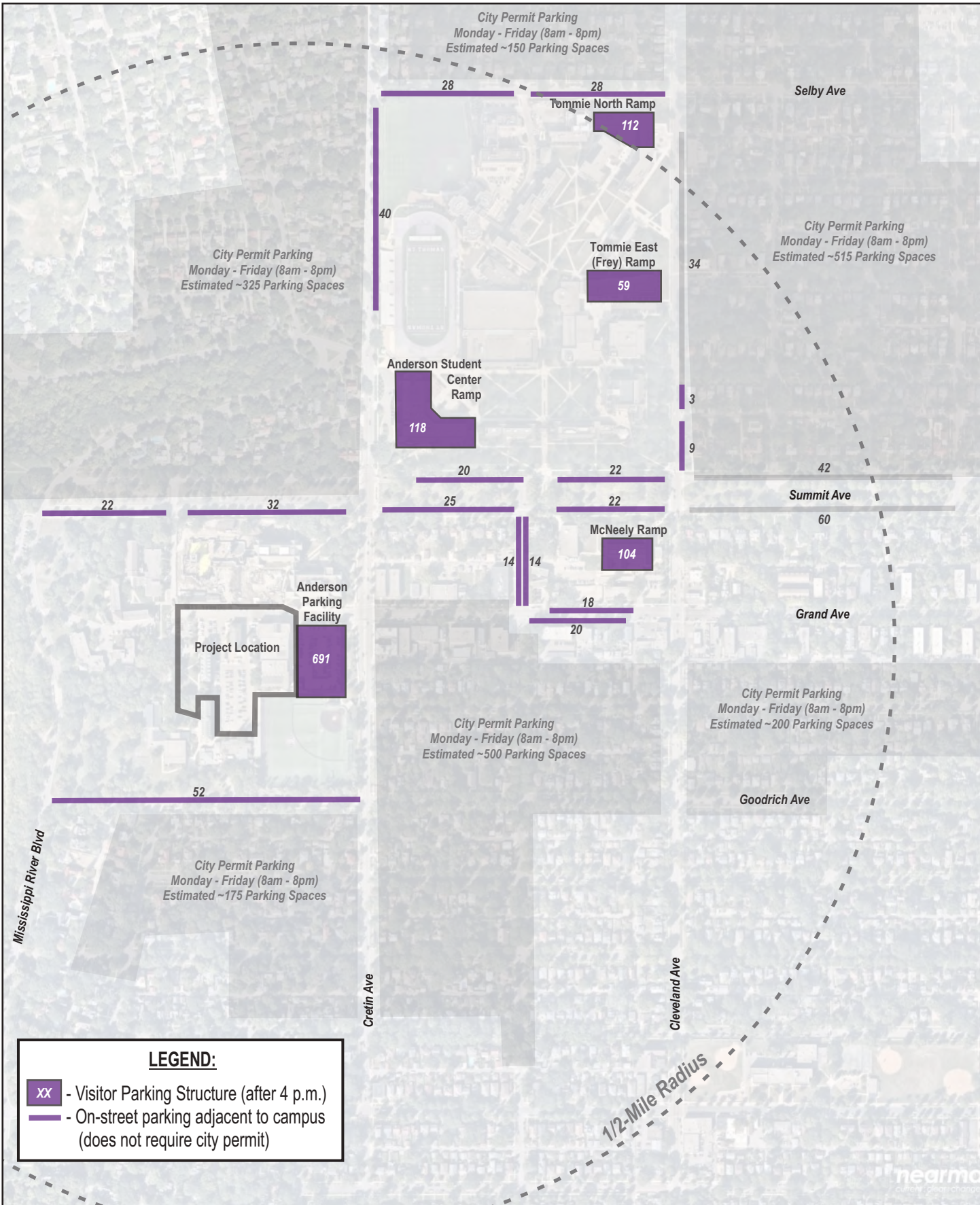
- **Spring 2023 Counts:** Schoenecker Center was under construction and surface parking within the Schoenecker Center construction footprint (a non-visitor parking lot) had been demolished.
- **Spring 2024 Counts:** Schoenecker Center was open, the Arena was under construction, and the surface parking within the Arena construction footprint (non-visitor parking lots) had been demolished.

Note that with the removal of the non-visitor parking lots, it was anticipated that some of the displaced users would utilize the visitor parking facilities. Results of the comparison, shown in Table 1, indicate that parking utilization within the visitor lots has remained relatively consistent, despite the removal of the non-visitor parking lots, the Schoenecker Center being open, and the construction of the Arena being underway. In general, the available parking supply at the visitor parking facilities has decreased by approximately five (5) percent during the weekday peak (1:00 p.m.), whereas the available parking supply has actually increased by approximately three (3) percent during weekday evenings (6:00 p.m.), when event traffic is expected to arrive. Given that the Spring 2023 counts (which were utilized within the *2023 EAW Transportation Analysis*) showed less available parking supply during weeknight events than the latest counts (Spring 2024), the Spring 2023 counts were continued to be utilized within the updated event parking demand analysis to provide a conservative estimate. It should be noted that, unlike the Schoenecker Center and Arena projects, the Microgrid Project is not expected to displace or remove any campus parking.

Table 1. Available Parking Supply Comparison

Lot ID	Total Unrestricted Parking Spaces	Available Parking Supply			
		Weekday (1:00 pm)		Thursday/Weeknight (6:00 pm)	
		Spring 2023	Spring 2024	Spring 2023	Spring 2024
APF	691	78	54	383	417
ASC	118	24	17	96	89
McNeely	104	53	25	86	93
Tommie East	59	28	19	50	46
Tommie North	112	25	40	60	72
Total	1084	208	155	675	717

(1) Refer to the bullets above for a summary of the development, construction, and parking conditions during each parking count.



Performance Hall Events

While the Schoenecker Center is an academic building, it does have a small performance hall (195-person capacity) that is expected to attract outside visitors. It is projected to host approximately 35 to 40 events annually, with attendances typically ranging from 50 to 150 individuals, the majority of which are expected to occur on weeknights. It should be noted that these events generally are not new to campus; they were previously held at various other campus buildings, such as the Brady Education Center Auditorium on South Campus (which has a larger capacity) and are now being relocated to the new performance hall. Depending on the event size, the performance hall could draw an additional 25 to 100 vehicles to campus compared to a typical day/night. While the campus parking supply and adjacent roadway network can accommodate these users on typical weeknights and weekends, simultaneous events at the performance hall alongside larger events at the Arena are expected to further increase congestion and potential parking deficits on campus. Therefore, it is **recommended to avoid scheduling other on-campus events that would attract non-student/staff visitors (who require on-site parking) during higher attendance sporting events held at the Arena.** Note this recommendation and the anticipated level of attendance at which other on-campus events should be avoided is discussed further in the “Recommended Parking Mitigation” section of this addendum.

Key Findings

- Given the Spring 2023 counts (which were utilized within the *2023 EAW Transportation Analysis*) showed less available parking supply during weeknight events than the latest counts (Spring 2024), the Spring 2023 counts were continued to be utilized within the updated event parking analysis to provide a conservative estimate.
- The Schoenecker Center and Microgrid Projects are expected to have minimal impacts on campus traffic and parking.
- Given the Schoenecker Center performance hall hosts events that will attract outside visitors, it is recommended that UST avoid scheduling other on-campus events that would attract non-student/staff visitors (who require on-site parking) during higher attendance sporting events held at the Arena.

St. Paul Seminary Parking Lot Project

Project Information

The St. Paul Seminary (“SPS”), located north and west of the UST South Campus, intends to construct a surface parking lot along Mississippi River Boulevard (herein referred to as the “SPS Parking Lot”). The SPS Parking Lot is proposed to consist of approximately 73 surface parking stalls, with access to the new surface parking lot provided at the existing SPS access drive from Mississippi River Boulevard. The project was submitted to the City of St. Paul for site plan approval in July 2024, and



if approved, is anticipated to begin construction in late 2024/early 2025 and be completed by summer 2025.

Traffic/Parking Operations

Since students, faculty, and staff of SPS currently park at parking facilities located on UST's South Campus, the proposed SPS Parking Lot would free up more parking spaces for UST students, staff, and visitors. SPS users destined for the new parking lot would utilize the existing SPS access location along Mississippi River Boulevard. Based on the operations analysis completed in the *2023 EAW Transportation Analysis*, which indicates that the Summit Avenue and Goodrich Avenue intersections with Mississippi River Boulevard operate at an overall Level of Service (LOS) A (Table 3 of the *2023 EAW Transportation Analysis*), Mississippi River Boulevard has sufficient capacity to accommodate these vehicles.

It is important to recognize that event traffic and parking operations can often present conflicting challenges; while increased parking capacity benefits parking operations by accommodating more vehicles, it can worsen traffic congestion, whereas less parking can help spread out traffic, thus reducing congestion. To summarize the conservative approach for traffic and parking operations analysis and how the SPS Parking Lot might influence the analysis results, the following information is provided:

- **Traffic Operations:** Assuming the UST visitor parking ramps are fully occupied by Arena event patrons represents a worst-case scenario for traffic operations, as it maximizes the event traffic and congestion in the study area during pre- and post-event times (highest amount of cars driving to and from the visitor parking ramps).
 - All previous traffic modeling assumed the Anderson Parking Facility (APF) and other UST visitor ramps were fully occupied by event patrons to represent a worst-case traffic operations scenario, as it would have the largest amount of vehicles entering and exiting those visitor ramps during peak event times. Therefore, the SPS Parking Lot, which would free up more parking spaces for UST use, would have no impact on the previous event operations analysis since the *2023 EAW Transportation Analysis* assumed that SPS users were not using the visitor lots at the time of events.
- **Parking Operations:** Assuming that the parking ramps are not fully occupied by event patrons (i.e. the available parking supply is based on the parking counts collected during event times which includes UST and SPS non-event users) represents a worst-case scenario for parking operations, as there is less available supply to accommodate the event parking demand.
 - Given the SPS Parking Lot is currently going through the submittal process and is not approved by the City, it was not assumed within the updated parking analysis, therefore, the analysis assumes that SPS users are parking in the APF ramp, which is consistent with the 2023 EAW Transportation Analysis. However, if the project is completed, it would result in an increase in parking availability at UST visitor facilities, which could be used for events.

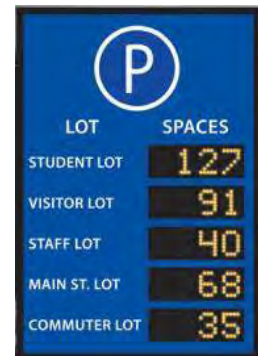
Technical Clarification

The following section clarifies a statement in the *2023 EAW Transportation Analysis* that may have been misinterpreted during the EAW process. The guidance, which is found on Page 17 in the “Non-Event Conditions” section of the report, is as follows:

- “Note it is generally good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional five (5) to 15 percent. This extra supply reduces the unnecessary circulation of vehicles looking for parking and the perception of inadequate parking.”

While this statement holds true during daily non-event conditions, it does not apply to event conditions; during event conditions, common practice involves implementing strategies to fully utilize parking supply. Note the following strategies are planned and/or recommended to help reduce the circulation of vehicles in the project area.

- **UST plans to implement a smart parking system** to reduce congestion and circulation (see example in the inset). The system is expected to utilize real-time monitoring and campus signage (and may also include a phone application) to enable drivers to quickly find available parking spaces and minimize search times. This initiative aims to reduce driver frustration and emissions, enhance campus mobility, and improve the visitor/student experience. Although not identical, similar systems are operated at parking facilities throughout the metro, including the Mall of America, Minneapolis ABC ramps, and at the University of Minnesota. UST plans to implement this system prior to the Arena opening.
- As detailed later in this document, for event conditions it is recommended that **UST continue use of and further encourage pre-paid online event tickets and parking assignment.** UST currently uses an online ticketing system for athletic events which can be modified to provide additional information and parking assignments. When purchasing an event ticket, attendees must select their choice of transportation to the event, such as driving and utilizing parking on campus (as available) or choosing to use alternative transportation options. This process ensures attendees either have a designated parking spot if they choose to drive or are informed in advance that campus parking is unavailable, on-street parking is limited, and neighborhood parking restrictions are in place, with clear warnings about ticketing. This minimizes the need to circle campus lots and serves as a platform to inform users about alternative transportation options and incentives provided by the University.



Event Management Plan (EMP)

While the COA acknowledges the event traffic management mitigation, it also notes that the plan is “nonspecific, but presumably, it will include targeted mitigation measures”. Therefore, to provide clarity, a brief overview of what an Event Management Plan (EMP) entails is summarized below:

An EMP is a comprehensive plan designed to minimize transportation impacts and improve safety and efficiency for all modes of transportation during events. Typically developed after project approvals but before the first event occurs within the venue, the EMP refines and finalizes the mitigation strategies and improvements identified in earlier planning stages. The EMP functions as an operations manual and is developed with input from multiple stakeholders to define roles, responsibilities, and specific mitigation measures for different types and sizes of events. As a “living document” the EMP is continually updated and refined based on real-world experiences and feedback, with periodic revisions through stakeholder meetings, usually held once or twice a year (once before the series of events and once after the series of events).

The EMP continues to be a recommended mitigation measure through the 2024 EAW Update Transportation Analysis Addendum and UST plans to collaborate with the City of St. Paul Traffic Department and the St. Paul Police Department in development of the EMP. The plan will detail traffic and parking management for all event attendances, both athletic and non-athletic, and provide a framework for community communication. Unique to the typical EMP process, UST is planning to actively engage with its local neighborhood associations and a dedicated community input group will be consulted throughout the process to share ideas, assure communications with neighbors, and build consensus among neighborhood residents about the EMP details and logistics.

Project Updates

The Environmental Assessment Worksheet (EAW) phase typically represents an initial, preliminary stage in project development, aimed at assessing potential environmental impacts. Several updates to the project have occurred since the 2023 EAW documentation and are detailed in the following sections.

Site Plan Approval/APF Access Addendum

UST submitted a Site Plan application for the Arena to the City on September 6, 2023, and received final approval on April 4, 2024. As part of the site plan approval process, SRF Consulting prepared an Addendum to the *2023 EAW Transportation Analysis* titled the “APF Access Addendum”, which was completed in January 2024 and is included in this Appendix. The APF Access Addendum was completed to address changes in assumptions since the *2023 EAW Transportation Analysis*, primarily related to pedestrian access from the Anderson Parking Facility (APF) to the Arena. Originally, the west side of the APF was expected to be modified to provide a direct connection for APF users and the Arena. While an at-grade pedestrian access is still proposed on the west side of the APF, it no longer provides access to other levels of the ramp and is no longer intended for event use. The current proposal routes pedestrians to/from the APF using the northeast stair tower, thus crossing APF

vehicular traffic either at the APF entrance or the Cretin Avenue/Grand Avenue intersection. The APF Access Addendum evaluated event operations with the current APF access assumptions and recommended additional mitigation strategies to address issues, including to cross pedestrians at the Cretin Avenue/Grand Avenue intersection. Assuming off-site parking and shuttle services are provided for maximum capacity basketball events, the additional mitigation improvements and strategies are expected to enable these events to operate similarly to the mitigated operations outlined in the 2023 EAW. A graphical comparison of the anticipated operations is provided in this Appendix. The figure illustrates that while maximum queues may be slightly longer during pre-event conditions, the level of service is generally consistent, with overall congestion times still projected to be 20-30 minutes before an event. For post-event conditions, the total clearing times of the APF ramp are expected to increase from 15-30 minutes to 20-35 minutes. Note this represents the total ramp clearing time during post-event conditions, not the average delay per vehicle exiting the ramp.

As a result of the site plan approval process, the following infrastructure and management strategies were identified/required, some of which may be considered as mitigation for the project:

Infrastructure

- Construct a new traffic signal at the Cretin Avenue/Grand Avenue intersection.
 - As part of construction, the signal cabinet will be relocated, and the pedestrian facilities will be widened in the northwest quadrant and along the north side of the private portion of Grand Avenue to accommodate event pedestrian demand.
- Construct curb extensions at the Cretin Avenue/Goodrich Avenue intersection to improve pedestrian safety.
- Construct a southeast Cretin Avenue access into south campus, with gate arm protection, for service vehicles, emergency vehicles, and potential shuttle/bus services.

Management Strategies:

- Implement pedestrian wayfinding to cross pedestrians at the Cretin Avenue/Grand Avenue intersection.
- Provide traffic control officers at the Cretin Avenue/Grand Avenue intersection to improve operations and pedestrian safety.
- Implement an alternative access solution to the Arena from the APF (i.e. skyway or vertical circulation element) if event operations/pedestrian conflicts are determined to be problematic by the city.

Non-Athletic Events

The primary scheduled, reoccurring use of the Arena is for basketball and hockey events and therefore this use was selected as the focus of the EAW transportation analysis. While other event types could have similar capacities, due to the infrequency and unknown nature of these other events, they were not the focus of the EAW. To offer additional insight into potential events beyond UST athletics, the following summary provides an overview of other anticipated activities at the Arena:

- **UST Commencement:** Scheduled for May, with approximately six (6) sessions over Saturday and Sunday, accommodating 3,000 to 4,250 attendees each. Note commencements already occur on campus at the Anderson Athletic and Recreation Complex. Although the proposed Arena has the capacity to accommodate slightly more visitors (i.e. end stage configuration capacity of 4,523), current feedback from students and families indicates a preference for multiple smaller commencements. As a result, it is expected that the tradition of holding several smaller ceremonies will continue either in the Anderson Athletic and Recreation Complex or in the Arena. Historically the parking demand for commencement events has been able to be accommodated on/near campus, with demand expected to be similar to that of a higher attendance hockey event. Note additional parking is often available during commencement weekend as classes are not in session and on-campus residents have moved off campus.
- **High School Commencement:** Although no discussions have taken place with any school districts, UST is open to leasing the Arena for high school commencements. These events would likely occur in May or June, typically on weekdays from 6 to 8 p.m., with attendances and parking demand similar to UST's commencement.
- **External Events:** The feasibility and external demand for hosting concerts, comedians, and other non-academic events within the Arena are currently unknown. However, the university is open to the possibility of leasing the space for such activities. Should there be interest in scheduling these events, they are anticipated to occur during summer or other non-academic periods when campus activity is lower. Aside from a center stage configuration, which limits the capacity to 5,500 seats, these events are expected to have a lower capacity (i.e. end stage configuration capacity of 4,523) compared to maximum capacity basketball events. These events are anticipated to occur infrequently (similar to commencements) and any projections regarding their attendance and frequency remain speculative.
- **Career Fairs/Conventions:** UST anticipates hosting between one (1) to three (3) career fair events in the new facility, with a total expected attendance of approximately 1,000. It is important to note that career fairs/conventions are already conducted on campus, and the parking demand for outside visitors for these events has historically been accommodated in the visitor parking facilities.
- **Youth Sports Practices/Games:** Scheduled throughout the year, with varying numbers of participants, typically fewer than 50 youth participants and their families. It should be noted that there is only one auxiliary sheet of ice and two basketball courts, which limits the capacity of these facilities and the subsequent parking demand on campus.
- **Youth Sports Camps:** Expected to take place in the summer, accommodating around 400 participants. Similar to commencements and career fairs/conventions, youth sports camps already occur on campus. These camps generally occur during the summer months when campus activity is low, and parking has been largely available and easily accommodated.
- **Club Room Rentals:** Available year-round, with attendances varying up to 150.

Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. However, as discussed for the Schoenecker Center Performance Hall, UST should be mindful of anticipated event sizes and avoid scheduling other events simultaneously with sporting events at the Arena that may result in a potential parking deficit on campus. Should UST decide to host an external event, it would likely be scheduled during summer or other non-academic periods. Aside from a center-stage configuration, a maximum capacity external event is expected to operate nearly identical to a maximum capacity basketball event and would likely adopt similar mitigation strategies identified in this report. Due to the considerable uncertainty surrounding the possibility of hosting large external events, it was not the primary focus of the EAW. It is expected to be further explored as part of the EMP, when the feasibility and demand for such events becomes more evident.

UST Basketball Seating Capacity

The maximum capacity for basketball games within the Arena has been revised since the *2023 EAW Transportation Analysis* assumptions. In the previous EAW, the seating capacity for a maximum basketball event was projected to be 5,500 event patrons. However, current designs indicate a capacity of 5,324, with student seating reduced from approximately 22 to 20 percent. Given a maximum basketball event represents the worst-case scenario for transportation (congestion and parking), the original capacity of 5,500 has been retained throughout this addendum and the student/non-student assumptions have been adjusted for 20% student seating to provide a conservative estimate.¹

UST Men's Hockey Conference

The National Collegiate Hockey Conference (NCHC) announced in May 2024 that they would be expanding to 10 teams, with Arizona State University joining in 2024-25 and the University of St. Thomas becoming a full-time member beginning in the 2026-2027 season. As part of the *2023 EAW Transportation Analysis*, attendance data was collected for numerous similar programs within UST's current men's hockey conference, the Central Collegiate Hockey Conference (CCHA) (see Pages 19-22 of the *2023 EAW Transportation Analysis* for previous data collected). While the hockey Arena capacity and event schedules/times are expected to remain unchanged, attendance projections are expected to increase with the University entering the NCHC, given the conference is home to some of the more successful collegiate hockey programs in the country. Therefore, attendance data was collected for the NCHC and compared to the previous attendance data published within the EAW

¹ As noted in the *2023 EAW Transportation Analysis*, St. Thomas has held other on-campus campus events with more than 5,500 attendees, including football games. As noted in the 2024 EAW Update, the capacity for non-athletic events using a center stage configuration is 5,500, so continued use of this figure also helps in planning for any such events. More information on current UST athletic events held on campus can be found on Page 19 of the *2023 EAW Transportation Analysis*.

for the CCHA, as shown in Figure 2. Consistent with the *2023 EAW Transportation Analysis*, the data was collected from the 2022-2023 regular season and the top/bottom (North Dakota/Miami) capacity programs were removed to eliminate outliers.

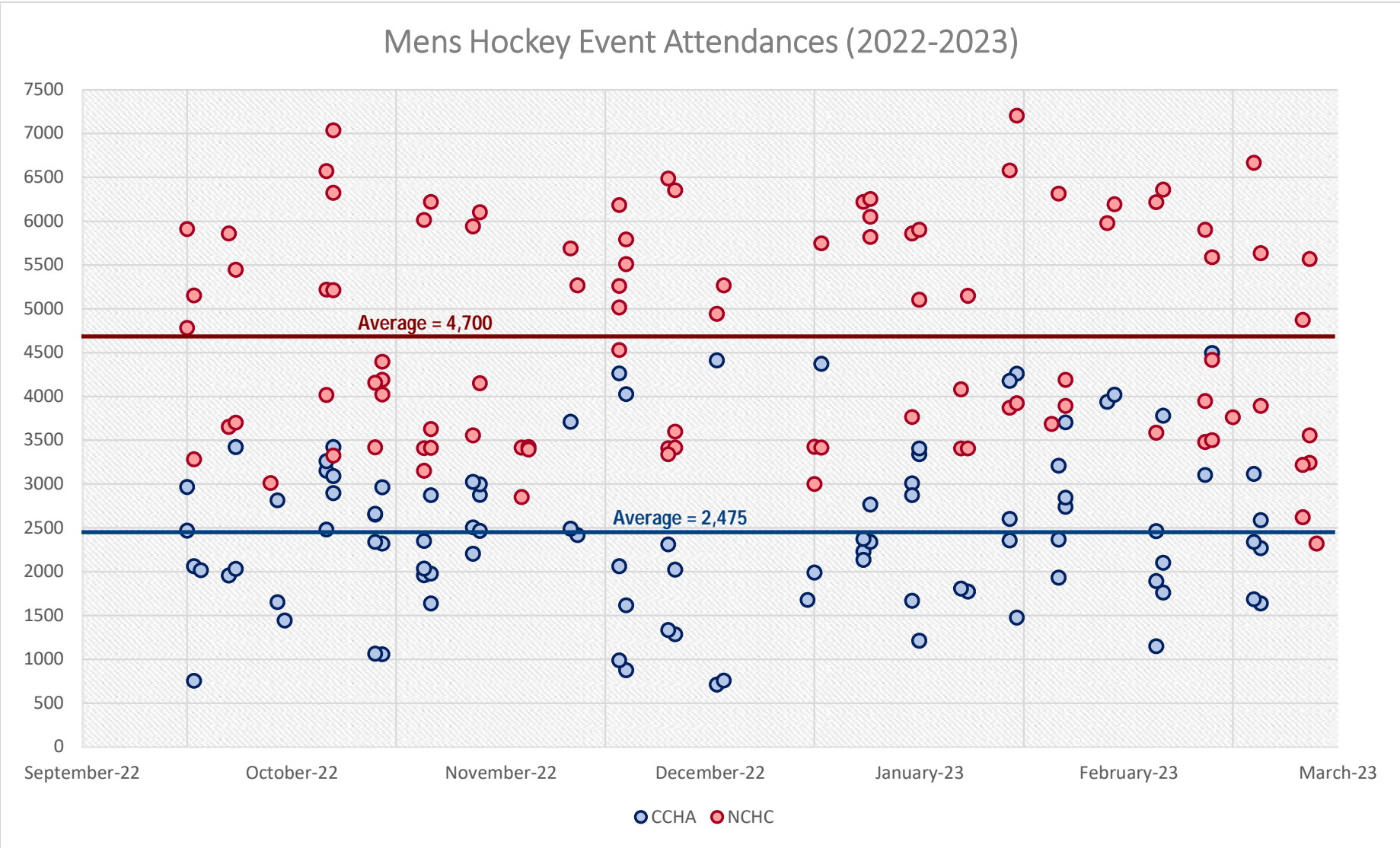
Based on the comparison between the NCHC and CCHA, average attendances within the NCHC are nearly double the attendances within the CCHA. Given that several programs within the NCHC have higher stadium capacities than both the CCHA stadiums (average capacity of 4,400) and the proposed Arena (i.e. 4,000 for hockey), the percentage occupied was utilized for NCHC programs to adjust attendance projections for UST, following the conference transition. The changes in attendance projections detailed in the *2023 EAW Transportation Analysis* are summarized in Table 2.

Table 2. UST Hockey Attendance Projection Changes

Conference Data	Average Attendance	Higher Attendance Games
CCHA (Current Conference, 2023 EAW Transportation Analysis)	2,475	2 to 4
NCHC (Future Conference, 2024 EAW Transportation Analysis Update Addendum)	3,600	6 to 9

Based on this data, the expected average attendance has increased from 2,475 to 3,600, while maximum capacity games are expected to increase from 2-4 to 6-9 times per year. It should be noted that the *2023 EAW Transportation Analysis* focused the transportation analysis on a maximum capacity basketball game (5,500) and a typical event (3,000) (see explanation on Page 21 of the *2023 EAW Transportation Analysis*). The typical event was intended to represent a conservative “average” for both men’s hockey and men’s basketball, as well as a maximum attendance women’s sports game. However, due to the updated attendance projections for men’s hockey surpassing the previous typical range, and the lower average attendances expected for men’s and women’s basketball games (1,800 and 1,175 respectively – see Figure 7 of the *2023 EAW Transportation Analysis*), the updated event parking analysis now reflects actual average attendances for each sport instead of the previous typical event of 3,000. For the purposes of this addendum and the event parking demand analysis, all men’s hockey games are assumed to be maximum capacity events to take a conservative approach. It should be noted that a maximum capacity men’s basketball game is still the worst-case scenario from a traffic operations and parking perspective, and the attendance projections and frequency for men’s basketball games is expected to remain consistent with those outlined in the *2023 EAW Transportation Analysis*.

Figure 2 - Attendances per Men's Hockey Conference



Updated Event Parking Analysis (Issue Identification with No Mitigation)

The available parking supply for each event parking location (see Figure 1) is summarized in Table 3. Note the table is generally consistent with the available parking supply published within the *2023 EAW Transportation Analysis* (Page 26, Table 12), which was based on the Spring 2023 counts and adjustments for impacted lots/seminary users. The only update since the *2023 EAW Transportation Analysis* is a correction of an error in the table, where the correct available supply of adjacent on-street parking was not accurately recorded. When rectified, the available parking supply is increased by two (2) spaces on Fridays, and 67 spaces on Saturdays. It should be noted that if the SPS Parking Lot project is completed, the parking supply in the UST visitor lots is expected to increase by 40 to 70 spaces, depending on the night.

Table 3. Available Parking Supply Before Events

Lot ID	Total Unrestricted Parking Spaces	Available Parking Supply ⁽¹⁾		
		Thursday/Weeknight 6:00 pm	Friday 6:00 pm	Saturday 6:00 pm
APF	691	302	526	569
ASC	118	96	100	108
McNeely	104	86	96	96
Tommie East	59	50	48	44
Tommie North	112	60	61	59
On-Street (Adjacent)	369	84	187 ⁽²⁾	281 ⁽²⁾
Total	1453	678	1,018	1,157

- (1) Includes parking supply adjustments to account for parking loss caused by the Arena footprint. If the SPS Parking Lot Project is completed, the available parking supply in the UST visitor lots is expected to increase by approximately 40 to 70 spaces, depending on the night.
- (2) Note there was an error in the available parking supply published within the *2023 EAW Transportation Analysis*, where the correct supply for adjacent on-street parking near the Arena was not accurately recorded. When rectified, the available parking supply increases by two (2) and 67 spaces for Friday and Saturday night, respectively.

Using the same modal split assumptions outlined in the *2023 EAW Transportation Analysis* (Table 10, Page 24) and the available parking supply outlined in Table 3, an event parking demand analysis was completed and is summarized in Tables 4 and 5. While the modal split assumptions remain consistent, the distribution of students versus non-students has been updated based on changes to the basketball Arena’s capacity and seating layout, which resulted in a slight increase in parking demand during events.

Table 4 details the anticipated parking demand by event/athletic type, utilizing both average and maximum events for men’s and women’s sports. Note this update provides a more accurate reflection of the events expected than the previous “typical” event, as the typical event of 3,000 no longer reflects a conservative estimate of all men’s average attendances.

Conversely, Table 5 is focused on parking demand by attendance levels regardless of the type of athletic event and provides a comprehensive overview of all possible attendance levels at the Arena. The table details the number of games expected for each attendance range, identifies attendance thresholds where parking can no longer be accommodated on/near campus (i.e. campus visitor lots and on-street parking immediately adjacent to campus) without mitigation, and highlights the number of games expected to exceed these thresholds, thus indicating when a parking deficit may occur.

Note the estimated attendances and number of games in both tables are based on information published within the *2023 EAW Transportation Analysis* and the updates outlined within this addendum (men's hockey). The estimated attendances and number of games referenced in Table 5 are further detailed within this Appendix, which provides additional information on the expected attendance/games for each athletic team. As previously assumed, there is expected to be sufficient parking in separate commuter/staff lots to accommodate UST players, coaches, and event vendors/staff, therefore, they were not included in the parking demand analysis.

Key takeaways from the updated event parking demand analysis are as follows:

- Based on the attendance data at similar programs, approximately 54 of the 66 anticipated sporting events are expected to have adequate parking without the need for mitigation. Of the 12 games where a parking deficit is expected, nine (9) are expected to only have a deficit of 35 spaces.
 - Note that if the SPS Parking Lot project is completed, the nine (9) events with an anticipated deficit of 35 spaces are no longer expected to have a parking deficit.
- Events with parking deficits of over 100 vehicles are only expected to occur one (1) to three (3) times per year, if at all.
 - Note that the true capacity for men's basketball (5,324) and the completion of the SPS Parking Lot project would reduce the parking deficit for these potential events.
- With no mitigation, the available parking supply on campus and adjacent on-street parking can generally accommodate events up to approximately 2,600 attendees on weeknights and 3,900 attendees on weekends.

Table 4. Event Parking Demand Analysis by Event Type (No Mitigation)

	Estimated Attendance	Estimated Parking Surplus/Deficit ^{(1) (2) (3)}		
		Thursday/Weekday Night	Friday Night	Saturday Night
Average Attendance				
M Hockey	3,600	-- ⁽⁴⁾	70	209
W Hockey	550	533	873	1,012
M Basketball ⁽⁵⁾	1,800	204	544	683
W Basketball ⁽⁵⁾	1,175	369	709	848
Maximum Attendance				
M Hockey	4,000	-- ⁽⁴⁾	-35	104
M Basketball	5,500	-770	-430	-291
W Basketball	3,000	-112	228	367

Table 5. Event Parking Demand Analysis by Attendance (No Mitigation) ⁽¹⁾⁽²⁾⁽³⁾

Attendance		Thursday/Weekday Night		Friday Night		Saturday Night	
Range	For Parking Analysis	Estimated Number of Games ⁽⁶⁾	Parking Surplus/Deficit	Estimated Number of Games ⁽⁶⁾	Parking Surplus/Deficit	Estimated Number of Games ⁽⁶⁾	Parking Surplus/Deficit
5,500 - 4,500	5,500	1	-770	0	-430	1	-291
	5,000		-639		-299		-160
	4,500		-507		-167		-28
4,499 - 3,500	4,000	0	-375	9	-35	10	104
	3,500		-244		96		235
3,499 - 2,500	3,000	1	-112	0	228	1	367
	2,500		20		360		499
2,499 - 1,000	2,000	8	151	0	491	9	630
	1,500		283		623		762
	1,000		415		755		894
Less than 1,000		5	>415	9	>755	12	>894
Attendance Threshold/ # Games with Deficit		2	2,575	9	3,870	1	4,395

- (1) UST players and coaches and event/vendor staff are expected to park in reconstructed Lot O or other commuter and faculty/staff lots within campus, and not in parking facilities used for event patrons.
- (2) As mentioned previously, the current designs indicate a capacity for men's basketball of 5,324. This reduction in capacity is expected to reduce parking demand by approximately 45-60 vehicles, which is not reflected in these numbers.
- (3) If the SPS Parking Lot is completed, available parking supply is expected to increase by approximately 40 to 70 spaces, depending on the night, which is not reflected in these numbers.
- (4) Men's Hockey games are expected to occur on Friday and Saturday nights only.
- (5) Note average attendance men's and women's basketball games are already occurring on campus.
- (6) Based on expected Hockey and Basketball attendance projections and schedules published within the 2023 EAW Transportation Analysis and this addendum.

Recommended Parking Mitigation

Despite the expected surplus in parking available without mitigation for most Arena events, the following parking mitigation strategies are recommended and detailed below. For the purpose of this 2024 EAW Update, these recommendations are assumed to apply to all sporting events over the attendance thresholds identified in Table 5 (i.e. 2,575 on a weeknight, 3,870 on a Friday, 4,395 on a Saturday). Note these are the approximate attendance thresholds at which UST can accommodate parking demand on/near campus without mitigation as mentioned above. The need for each recommendation is expected to be refined as part of the event management plan and as actual events occur at the Arena. These strategies are expected to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community. Each strategy includes an estimate of the reduction in parking demand it may achieve. Estimates are provided in ranges and can vary based on event characteristics, location, demographics, amongst other factors. The estimates are based on engineering judgement and discussion with the project team, reflecting anticipated changes in parking demand and capacity compared to the baseline modal assumptions outlined in the 2023 *EAW Transportation Analysis* (Table 10, Page 24).

Implement Pre-Paid Event Tickets & Specific Parking Instructions/Assignments (Mobile)

- Continue use of and further encourage pre-paid online event tickets. Note UST currently uses an online ticketing system for athletic events which can be modified to provide additional information and parking assignments. When purchasing an event ticket, attendees would also select their choice of transportation to the event. If driving, they would be provided a designated parking pass (as available) or would need to choose alternative transportation options. This process ensures attendees either have a designated parking spot if they choose to drive or are informed in advance that campus parking is unavailable, on-street parking is limited, and neighborhood parking restrictions are in place, with clear warnings about ticketing. This minimizes the need to circle campus lots and serves as a platform to inform users about potential alternative transportation options and incentives such as free transit, discounted rideshare, and alternative shuttle services, which are discussed below. Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no costs to event patrons, however, parking pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan.
- If event patrons are aware that all lots are full in advance, they may be more inclined to utilize transit/rideshare or carpool rather than look for parking and/or walking further distances.
- The smart parking system that UST plans to implement can also provide on-site wayfinding for users that visitor lots are full or limited to pre-assigned event parking only.
 - **This strategy plays a crucial role in communicating with event attendees and supports the implementation of the strategies outlined below.**

Implement Permit Modifications and Clear Visitor Parking Ramps Prior to Events

- Based on discussions with UST, the University is planning to reduce resident parking permits (for first- and second-year students) in Level 2 of the Morrison Hall parking ramp. UST anticipates that when these permits are reduced, students without permits will refrain from bringing their vehicles to campus; however, this will need to be monitored. By reallocating these permits to commuter and faculty use during weekdays, additional spaces could be cleared for events in the evenings and weekends. This permit modification could provide an additional 105 parking spaces for event use.
- Implement time-of-day restrictions and/or “no park” days/nights for the APF, four (4) of the five (5) visitor parking ramps, and/or Level 2 of the Morrison Hall parking ramp. Note the number of parking facilities cleared will be dependent on the expected attendance at each event, and will be further defined as part of the EMP. This strategy, which has been implemented successfully by UST in the past, clears spaces currently occupied by employees/commuters and ensures that event patrons with an assigned parking space have a space reserved in their designated ramp.
- By clearing/restricting these parking locations, it is estimated that between 150 to 405 additional parking spaces could be made available, depending on the night, beyond the available spaces shown in Table 3.
- To avoid essentially “shifting” student/staff parking to the public streets, the strategy should be paired with early communication and clear notification prior to enforcing the event parking restrictions in UST facilities. Online classes/telecommuting should also be promoted simultaneously, assuming multiple ramps are cleared, to ensure that the strategy is effective. Note that one of the visitor parking ramps is expected to remain available for commuting students/staff under all event scenarios, ensuring at least one (1) parking option is available while event activities are underway.
 - **Estimated Parking Supply Increase (beyond those shown in Table 3)**
 - **Weeknight/Thursday = 405 spaces**
 - **Friday Night = 180 spaces**
 - **Saturday Night = 150 spaces**

Provide Free Transit Pass Option with the Purchase of a Ticket

- Work with Metro Transit to include a free transit pass option with the purchase of a ticket. Note UST has had preliminary discussions with Metro Transit, and although further evaluation of the details is needed, initial discussions suggest that distributing free pass options through the online ticketing system appears to be feasible. Further details are expected to be finalized as part of the event management plan.
 - **Estimated Parking Demand Reduction = 10 to 30 vehicles**

Provide Discounted Rideshare

- Pursue a partnership with a rideshare company to provide discounted rates for event ticket holders. Preliminary discussions with two rideshare companies indicate that discounted rates can be easily implemented. Potential partnerships and discount pricing are expected to be discussed/refined in collaboration with stakeholders as part of the event management plan. It should be noted that while rideshare can help reduce parking demand, it also can contribute to increased traffic congestion in and around the study area. Further details regarding rideshare planning are expected as part of the event management plan.
 - **Estimated Parking Demand Reduction = 25 to 50 vehicles**

Provide Restaurant/Bar Shuttle Service

- Pursue a collaborative partnership with one (1) or two (2) restaurants and/or bars to offer shuttle services. While the focus of these services may initially be on higher attendance sporting events (noted above), providing consistency could enhance user familiarity and increase overall utilization. Note UST has had preliminary discussions with potential locations.
 - **Estimated Parking Demand Reduction = 25 to 75 vehicles**

Avoid Scheduling Other On-Campus Events

- UST should avoid scheduling other on-campus events that would attract outside non-student/staff visitors (who require on-site parking) during sporting events with attendances of 2,100 or greater.
 - **Reduces/eliminates simultaneous events and compounding impacts.**

Total Estimated Parking Supply/Demand Reduction

In summary, with the recommended mitigation strategies and incentives, the estimated parking supply/demand reductions are as follows. Note these initial mitigation strategies do not include off-site parking and shuttle services, which are considered only if/when needed and further discussed on the next page. A summary of the event parking demand analysis for maximum events with the proposed mitigation is summarized in Table 6, whereas a detailed breakdown for each attendance level with the proposed mitigation is provided in this Appendix. The attendance thresholds for which parking can be accommodated on/near campus with mitigation are summarized in Table 7. Since the estimated parking reductions were presented in ranges, the effectiveness of the mitigation is categorized as low or high.

- **Thursday/Weekday Night = 465 to 560 vehicles**
- **Friday Night = 240 to 335 vehicles**
- **Saturday Night = 210 to 305 vehicles**

Table 6. Event Parking Demand Analysis for Maximum Events (With Mitigation)

	Estimated Frequency	Deficit/Surplus ⁽²⁾		
		No Mitigation	With Mitigation	
			Low	High
Thursday/Weekday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-770	-305	-210
Max Women's Basketball (3,000)	0	-112	353	448
Friday Night Event				
Max Men's Hockey (4,000)	9	-35	205	300
Saturday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-291	-81	14
Max Men's Hockey (4,000)	9	104	314	409
Max Women's Basketball (3,000)	1	367	577	672

- (1) As mentioned previously, the current designs indicate a capacity for men's basketball of 5,324. This reduction in capacity is expected to reduce parking demand by approximately 45-60 vehicles, which is not reflected in these numbers.
- (2) If the SPS Parking Lot is completed, available parking supply is expected to increase by approximately 40 to 70 spaces, depending on the night, which is not reflected in these numbers.

Table 7. Attendance Thresholds (With Mitigation)

Day/Night	Attendance Thresholds		
	No Mitigation	With Mitigation	
		Low	High
Thursday/Weeknight Event	2,575	4,350	4,700
Friday Night Event	3,870	4,775	5,125
Saturday Night Event	4,395	5,200	5,550

= To be conservative, use the low effectiveness threshold for determining when off-site parking/shuttle services should be provided.

With the recommended mitigation strategies and incentives, event parking is expected to be accommodated on/near campus for all games with attendances less than 4,350, regardless of the day of the week. Note this threshold covers all maximum capacity hockey events, and most, if not all, basketball events expected at the Arena. However, if a maximum capacity basketball event occurs on a weeknight, a parking deficit of 200 to 300 vehicles is expected. Therefore, basketball games with attendances exceeding the lower effectiveness attendance thresholds (such as 4,350 on a weeknight, 4,775 on a Friday night, or 5,200 on a Saturday night), it is recommended that UST **offers off-site parking and shuttle services**. It should be noted that UST has had preliminary discussions with Allianz Field to utilize their parking lot for shuttle services, which has sufficient available parking to accommodate the deficits. The objective is to provide enough off-site parking spaces to accommodate the potential parking deficit. This strategy could be implemented until real-world data indicates it is not needed or additional parking is constructed on campus.

Executive Summary

Event Operations (With and Without Mitigation)

An illustrative summary of the pre- and post-event operations with and without mitigation is shown in Figures 3 through 6. Recommended traffic management and safety strategies are summarized in this Appendix, and include, but are not limited to, deploying traffic control officers, implementing event-specific signal timing plans, assigning parking attendants to designated ramps, and establishing designated pedestrian routes and closures. Additionally, several event management strategies have been identified for potential future consideration if needed. Ongoing discussions and adjustments to these strategies are anticipated as part of the EMP, incorporating real-world experiences and feedback.

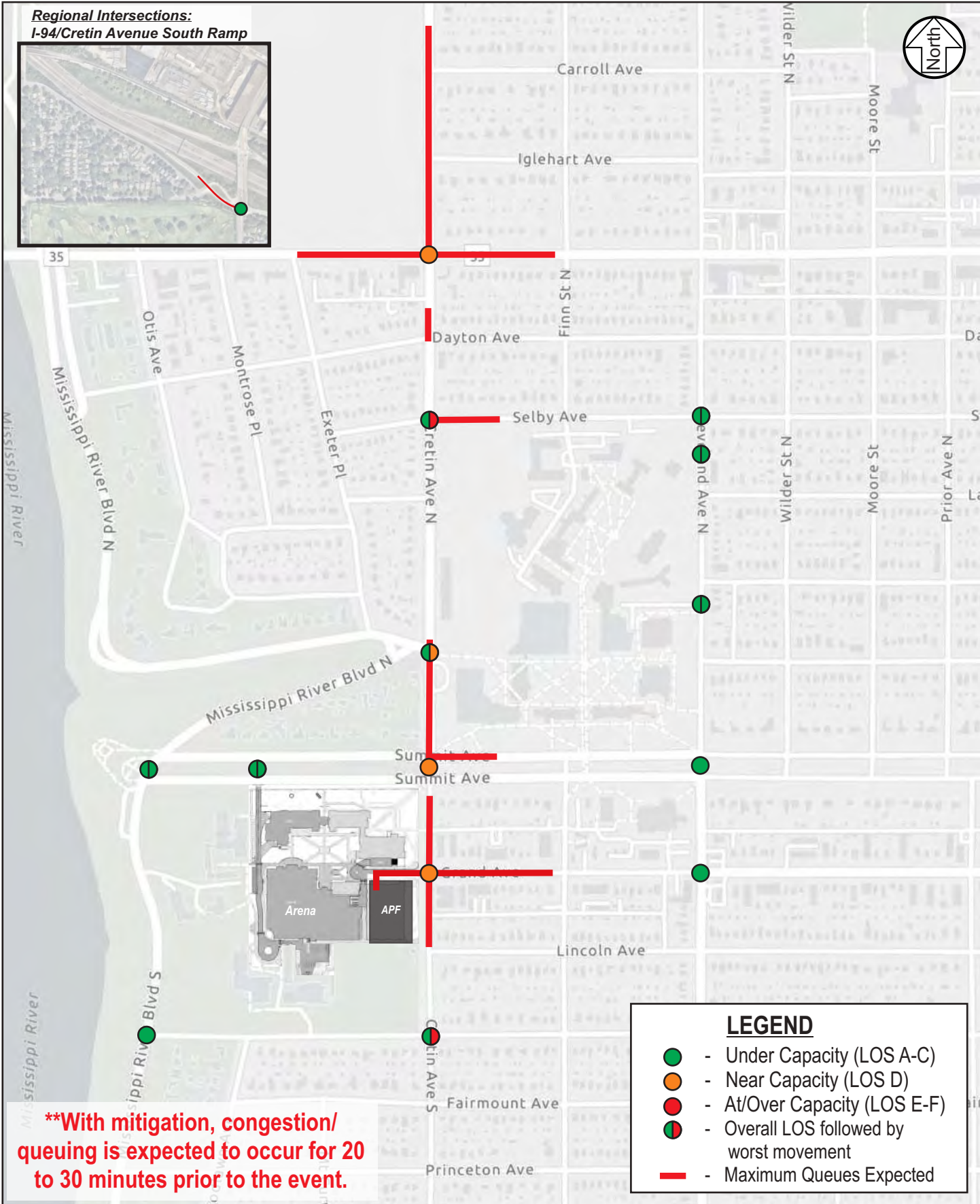




Max Capacity (5,500) - Post-Event Operations (No Mitigation)

2024 EAW Update Transportation Analysis Addendum
 City of St. Paul

Figure 4





Max Capacity (5,500) - Post-Event Operations (With Mitigation)

2024 EAW Update Transportation Analysis Addendum
City of St. Paul

Figure 6

Event Parking (With and Without Mitigation)

A summary of the event parking demand analysis for maximum events with and without mitigation is summarized in Tables 8 and 9 (matches Tables 6 & 7 within this Addendum). Given the estimated parking reductions were provided as ranges, the effectiveness of the mitigation is classified as either low or high. For basketball events exceeding the lower effectiveness attendance thresholds (when a deficit is expected with initial mitigation strategies), it is recommended that UST **offers off-site parking and shuttle services**. The parking mitigation strategies are expected to be refined as part of the event management plan, based on actual events at the Arena and a deeper understanding of event parking dynamics.

Table 8. Event Parking Demand Analysis for Maximum Events (With Mitigation)

	Estimated Frequency	Deficit/Surplus ⁽²⁾		
		No Mitigation	With Mitigation	
			Low	High
Thursday/Weekday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-770	-305	-210
Max Women's Basketball (3,000)	0	-112	353	448
Friday Night Event				
Max Men's Hockey (4,000)	9	-35	205	300
Saturday Night Event				
Max Men's Basketball (5,500) ⁽¹⁾	1	-291	-81	14
Max Men's Hockey (4,000)	9	104	314	409
Max Women's Basketball (3,000)	1	367	577	672

- (1) As mentioned previously, the current designs indicate a capacity for men's basketball of 5,324. This reduction in capacity is expected to reduce parking demand by approximately 45-60 vehicles, which is not reflected in these numbers.
- (2) If the SPS Parking Lot is completed, available parking supply is expected to increase by approximately 40 to 70 spaces, depending on the night, which is not reflected in these numbers.

Table 9. Attendance Thresholds (With Mitigation)

Day/Night	Attendance Thresholds		
	No Mitigation	With Mitigation	
		Low	High
Thursday/Weeknight Event	2,575	4,350	4,700
Friday Night Event	3,870	4,775	5,125
Saturday Night Event	4,395	5,200	5,550

= To be conservative, use the low effectiveness threshold for determining when off-site parking/shuttle services should be provided.

Mitigation Summary

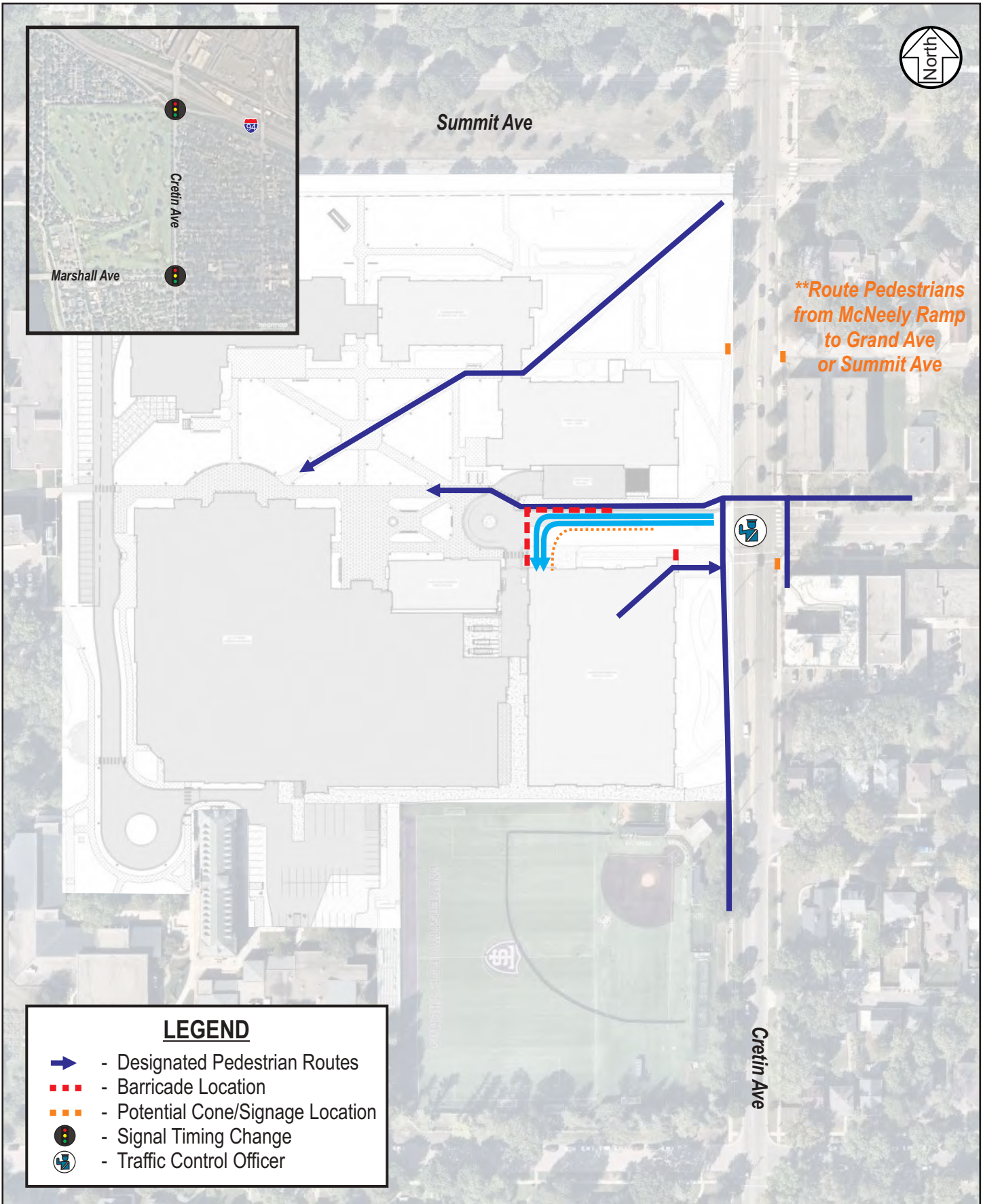
During the 2023 EAW process, Site Plan Review, and the early stages of the Event Management Plan, the project team has identified, assessed, discussed, and pursued various infrastructure improvements, parking mitigation strategies, and traffic management/safety enhancements. Due to the extensive range of mitigation measures considered, some may have been overlooked in the various documents and addendums. Therefore, to provide a comprehensive overview, Table 10 was developed to summarize all mitigation strategies and improvements that the University has either committed to or that have been recommended as part of this 2024 EAW Update Transportation Analysis Addendum. This table is expected to be updated as part of the event management plan to link specific mitigation measures to corresponding attendance levels at which they would be needed/required.

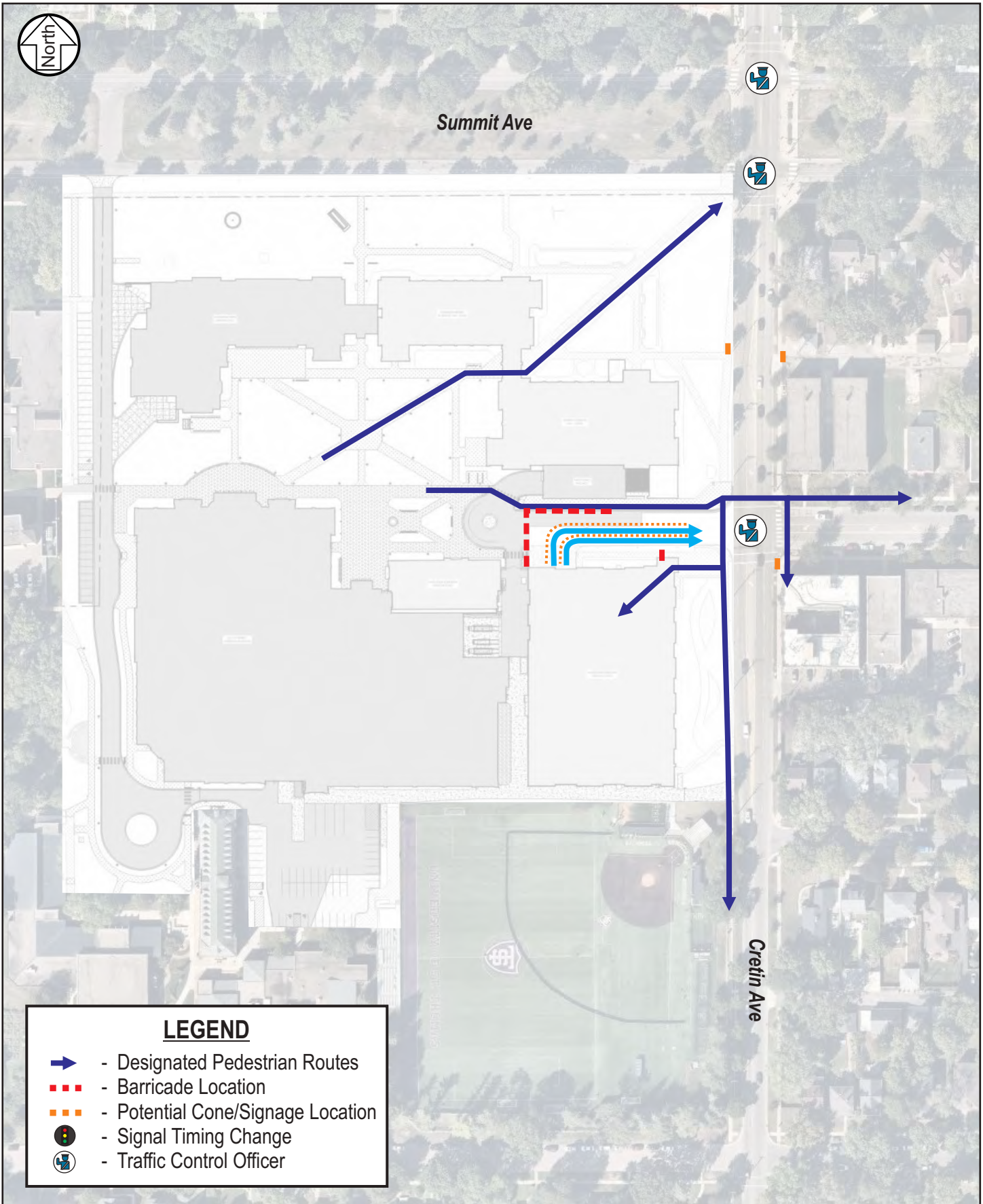
Table 10 - Proposed Mitigation Strategies and Improvements

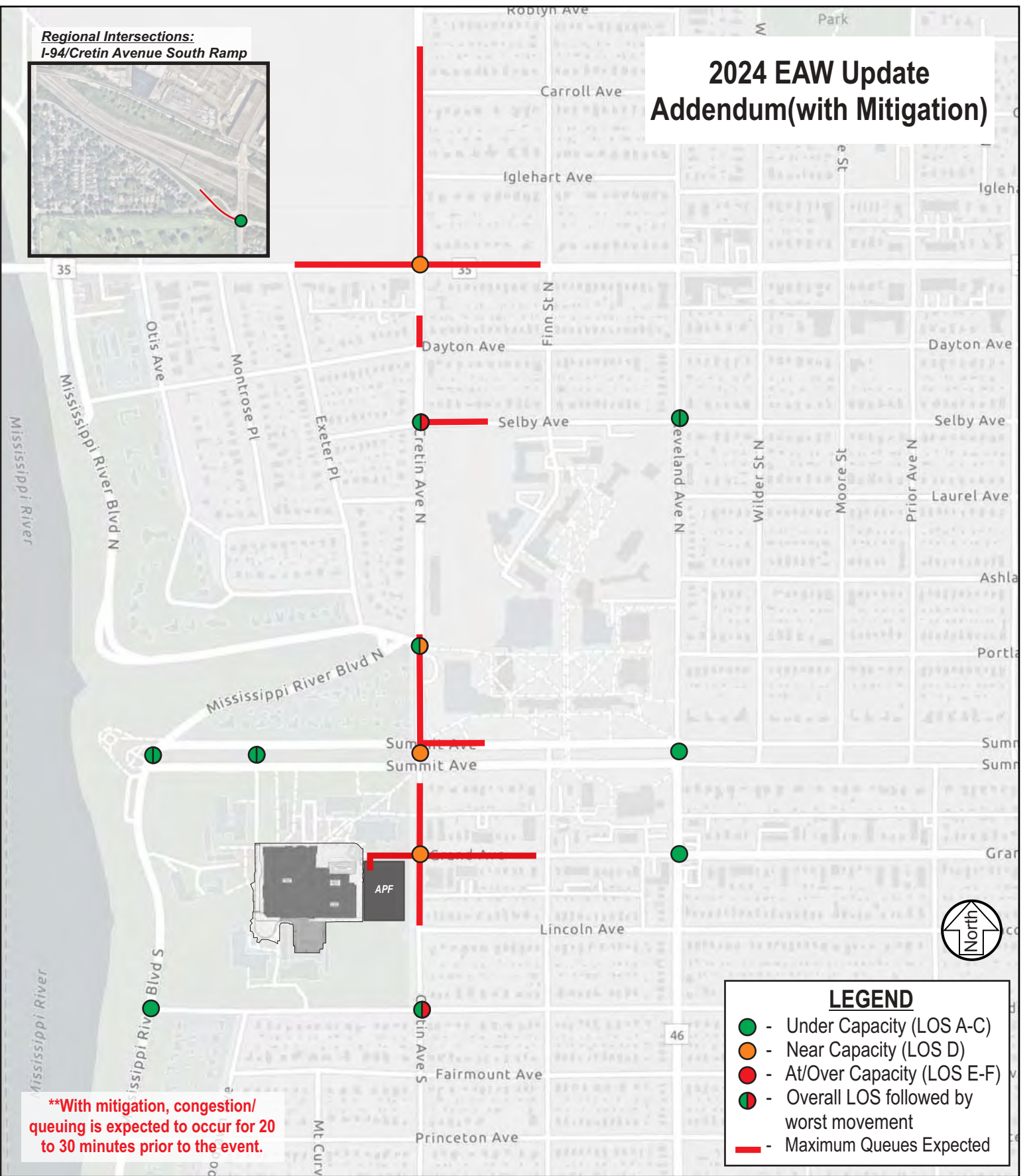
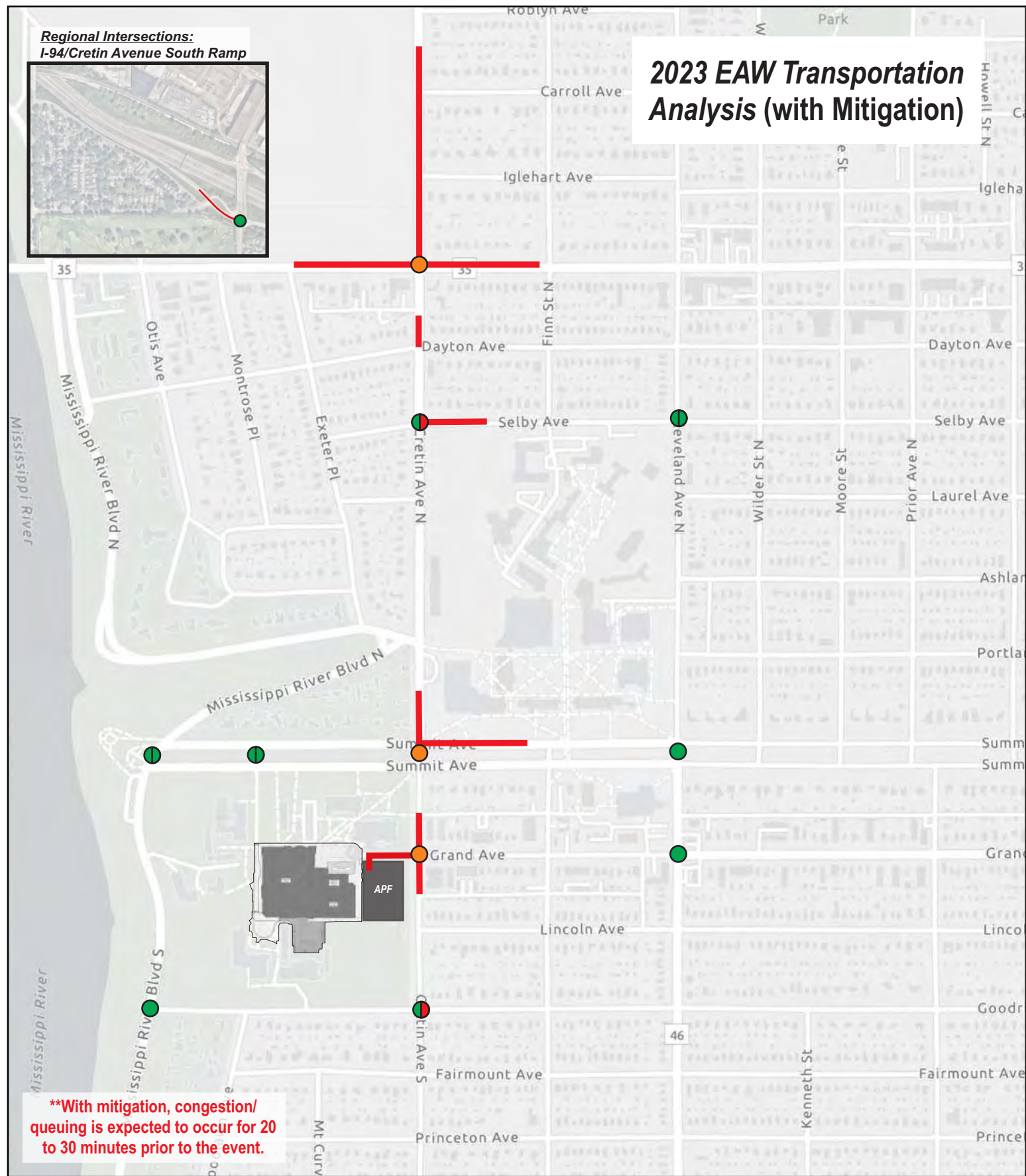
Mitigation	Benefit
Infrastructure	
Construct New Traffic Signal at Cretin Avenue/Grand Avenue Intersection	Traffic/Pedestrian Operations & Safety
Construct Pedestrian Improvements (i.e. relocated cabinet, widened facilities) along Grand Avenue	Pedestrian Operations & Safety
Construct SE Cretin Avenue Access (with gate arm protection)	Service/Emergency/Shuttle Service Access
Construct Curb Extension at Cretin Avenue/Goodrich Avenue	Pedestrian Safety
Implement Smart Parking System	Traffic/Parking Operations
Implement Alternative Access Solution to Arena from APF if Deemed Necessary	Traffic/Pedestrian Operations & Safety
Event Management Plan (EMP)	
Developed to Monitor and Adjust Strategies below based on actual operations (living document)	Helps "right size" strategies based on real world conditions
Meetings with City, SPPD, and neighborhood engagement	Ensures constant communication with area stakeholders
Rideshare, Transit, Shuttle Plans	Plan developed for rideshare, transit, and shuttle services
Emergency Vehicle Plan	Plan developed with SPPD for emergency vehicles
Parking	
Continue Use of Pre-paid Online Event Tickets	Helps Facilitate Strategies Below
Provide Communication on Alternative Transportation Options with Online Ticket Sales	Helps Facilitate Strategies Below
Implement Pre-paid Online Event Parking Assignment	Assigned Parking Reduces Circulating & Looking for Parking
Reduce Resident Parking Permits to Increase Visitor Parking (Morrison L2)	Increases Available Parking Supply
Clear Parking Ramps (APF, ASC, McNeely, Frey, Morrison L2) Prior to Game	Increases Available Parking Supply
Provide Advanced Notice, Online Classes, and other Strategies with Parking Ramp Clearing	Ensures Parking in Ramps isn't Displaced to Network
Free Transit Pass Option with Purchase of Ticket	Reduces Event Traffic & Parking Demand
Discounted Rideshare	Reduces Parking Demand
Restaurant/Bar Shuttle Services	Reduces Event Traffic (in study area) & Parking Demand
Other events on campus will not be scheduled	Limits Compounding Parking Deficits
Provide Off-Site Parking and Shuttle Services	Reduces Event Traffic (in study area) & Parking Demand
Traffic Management & Safety	
Traffic Control Officers along Cretin Avenue	Traffic/Pedestrian Operations & Safety
Event Signal Timing Plans at Strategic Intersections	Traffic Operations
Parking Attendants at Designated Parking Ramps	Traffic/Pedestrian Operations & Safety
Designated Pedestrian Routes & Pedestrian Wayfinding Campus-Wide	Pedestrian Operations & Safety
Sidewalk Closures and Pedestrian Wayfinding along Grand Avenue (near entrance)	Traffic/Pedestrian Operations & Safety

Appendix A

Mitigation Strategies Graphics & Event Parking with Mitigation (Detailed)







LEGEND

- - Under Capacity (LOS A-C)
- - Near Capacity (LOS D)
- - At/Over Capacity (LOS E-F)
- - Overall LOS followed by worst movement
- - Maximum Queues Expected

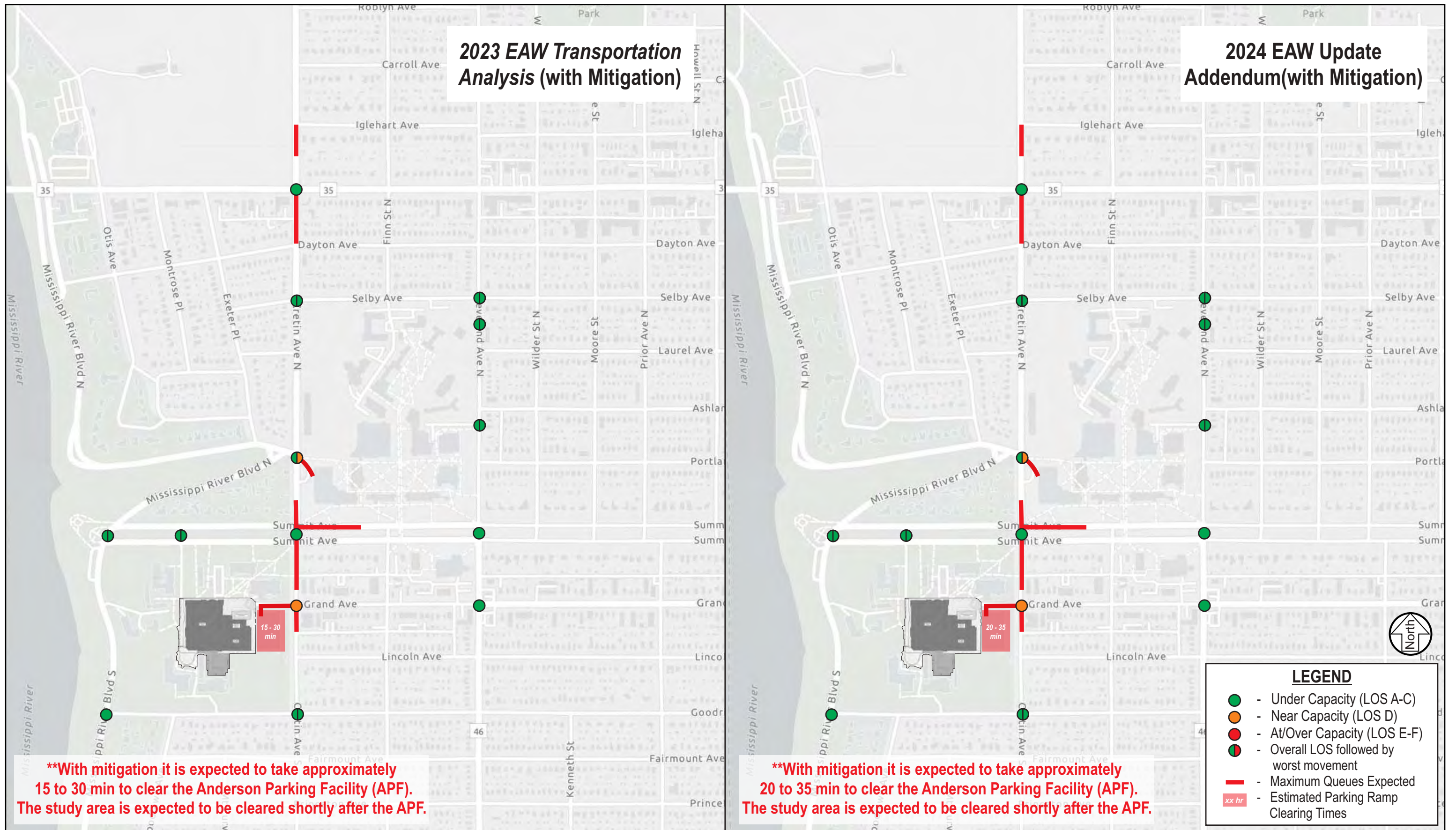


Table 1C. Event Parking Demand Analysis (With Mitigation) – Detailed Breakdown

Attendance		Thursday/Weekday Night				Friday Night				Saturday Night			
Range	For Parking Analysis	Number of Games ⁽²⁾	Estimated Parking Surplus/Deficit ⁽¹⁾			Number of Games ⁽²⁾	Estimated Parking Surplus/Deficit ⁽¹⁾			Number of Games ⁽²⁾	Estimated Parking Surplus/Deficit ⁽¹⁾		
			No Mitigation	Low	High		No Mitigation	Low	High		No Mitigation	Low	High
5,500 - 4,500	5,500	1	-770	-305	-210	0	-430	-190	-95	1	-291	-81	14
	5,000		-639	-174	-79		-299	-59	36		-160	50	145
	4,500		-507	-42	53		-167	73	168		-28	182	277
4,499 - 3,500	4,000	0	-375	90	185	9	-35	205	300	10	104	314	409
	3,500		-244	221	316		96	336	431		235	Mitigation Not Needed	
3,499 - 2,500	3,000	1	-112	353	448	0	228	Mitigation Not Needed	1	367	Mitigation Not Needed		
	2,500		20	485	580		360			499			
2,499 - 1,000	2,000	8	151	Mitigation Not Needed	0	491	Mitigation Not Needed		10	630			
	1,500		283			623				762			
	1,000		415			755				894			
Less than 1,000		5	>415			9		>755		12	>894		
Attendance Threshold/# Games with Deficit		-	2,575		4,350	4,700		-	3,870	4,775	5,125	-	4,395

Table 1D - Estimated Attendance Ranges per Sporting Team

Attendance	M Hockey	W Hockey	M Basketball	W Basketball	Total
5,500 - 4,500	0	0	2	0	2
4,499 - 3,500	18	0	1	0	19
3,499 - 2,500	0	0	1	1	2
2,499 - 1,000	0	1	9	7	17
Less than 1,000	0	17	2	7	26
Total	18	18	15	15	66

Appendix B
APF Access Addendum

To: Anthony Adams, PE, Civil Engineer
Ryan Companies

From: Brent Clark, PE, Project Manager – Traffic Studies
Collin Schroeder, PE, Traffic Operations and Modeling Lead

Date: January 23, 2024

Subject: *UST Multipurpose Arena EAW Transportation Analysis* – APF Access Addendum

Introduction

The *UST Multipurpose Arena EAW Transportation Analysis* was developed by SRF Consulting Group, Inc. (SRF) in June of 2023. Since completion of the EAW, pedestrian access assumptions to/from the Anderson Parking Facility (APF) have changed. Therefore, the objectives of this addendum are to evaluate the event operations expected with the current APF access assumptions and recommend mitigation improvements/strategies to address any issues, if necessary. The following information provides the assumptions, analysis, and recommendations offered for consideration.

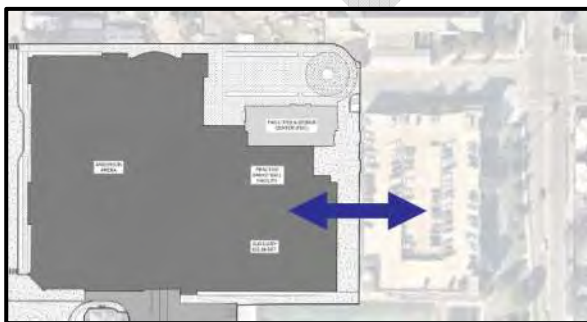
Assumption Modifications

The following assumptions have either been modified or additional information has been collected since completion of the EAW, that may impact the anticipated maximum capacity event operations.

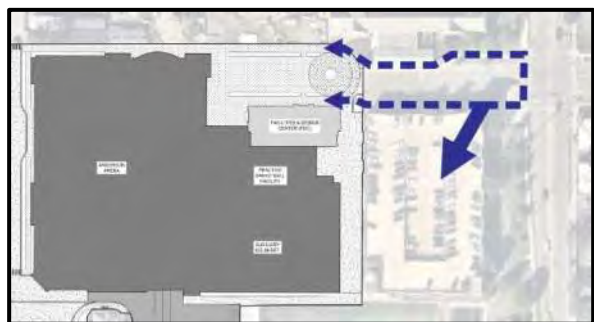
APF Pedestrian Access

As part of the EAW, the west side of the APF was expected to be modified to provide a pedestrian entrance/exit, thus providing a direct connection for APF users and the Arena. While an at-grade pedestrian access is still proposed on the west side of the APF (for access to the auxiliary ice rink only), a stairwell to provide pedestrian access from the other levels of the ramp is no longer proposed to be constructed at this time. Pedestrians are now proposed to route to/from the APF utilizing the northeast stair tower, thus crossing APF vehicular traffic either at the APF entrance or the Cretin Ave/Grand Ave intersection. Therefore, the main objective of this addendum is to evaluate the event operations expected with the current APF access and determine which crossing location is better from an operational and safety perspective.

Previous APF Access Assumptions



Current APF Crossing Options



Off-Site Parking & Shuttle Service

While off-site parking and shuttle services were identified as a mitigation strategy within the EAW, they were not assumed in any of the event operations analysis completed. As part of the EAW Mitigation, off-site parking and shuttle services will be provided for large events. Therefore, in order to accurately model a maximum capacity event, off-site parking and shuttle services were assumed to accommodate approximately 800 event-patrons and pick-up/drop-off was assumed on the west side of the Arena.

Event Arrival Volume Profiles

Peaks are expected to occur for vehicular and pedestrian traffic within the arrival and departure peak hours. As part of the EAW, 15-minute pre-event arrival distributions were developed based on detector data collected before Minnesota Twins/Vikings games and modified for the UST site to reflect higher peaks (closer event arrivals to game time) given UST is not in a downtown setting with nearby pre-event entertainment options. To better understand similar event types, ramp entering data was collected at four (4) Minnesota Gopher hockey/basketball games to review pre-event arrival distributions for similar Division-1 athletic events. Results of the data collection efforts determined that the pre-event arrival distributions for Minnesota Gopher events were more spread out than what was assumed within the EAW. Therefore, while the pre-event arrival distributions were not changed as part of this addendum, they may be more conservative than what is experienced in the field.

Operations Review

An operations analysis was conducted for both pre-event and post-event conditions during a maximum capacity weeknight event (i.e., basketball game) to determine the potential transportation impacts associated with the current APF access assumptions. The operations analysis was completed using VISSIM software, which is a more detailed microsimulation software than Synchro/SimTraffic that can better capture event operations and pedestrian/vehicle interactions. Note that based on discussions with the project team, the analysis was focused on the Grand Avenue/APF Access, Cretin Avenue/Grand Avenue, and Cretin Avenue/Summit Avenue intersections. In addition to the base assumptions identified within the EAW, various mitigation assumptions were also assumed within the analysis such as:

- Off-site parking and shuttle services were assumed to accommodate approximately 800 event patrons and pick-up/drop-offs were assumed on the west side of the Arena.
- Traffic control officers were assumed at the Cretin Avenue/Grand Avenue and Cretin Avenue/Summit Avenue intersections.
- Cones were assumed to provide two storage lanes for vehicles entering the APF, and two parking attendants (one per lane) were assumed to be checking pre-paid parking tickets during pre-event conditions.

Note the previous analysis assumed that APF users would have a direct pedestrian connection to/from the Arena. Therefore, the following pedestrian routing scenarios for APF users were analyzed from an operational and safety perspective:

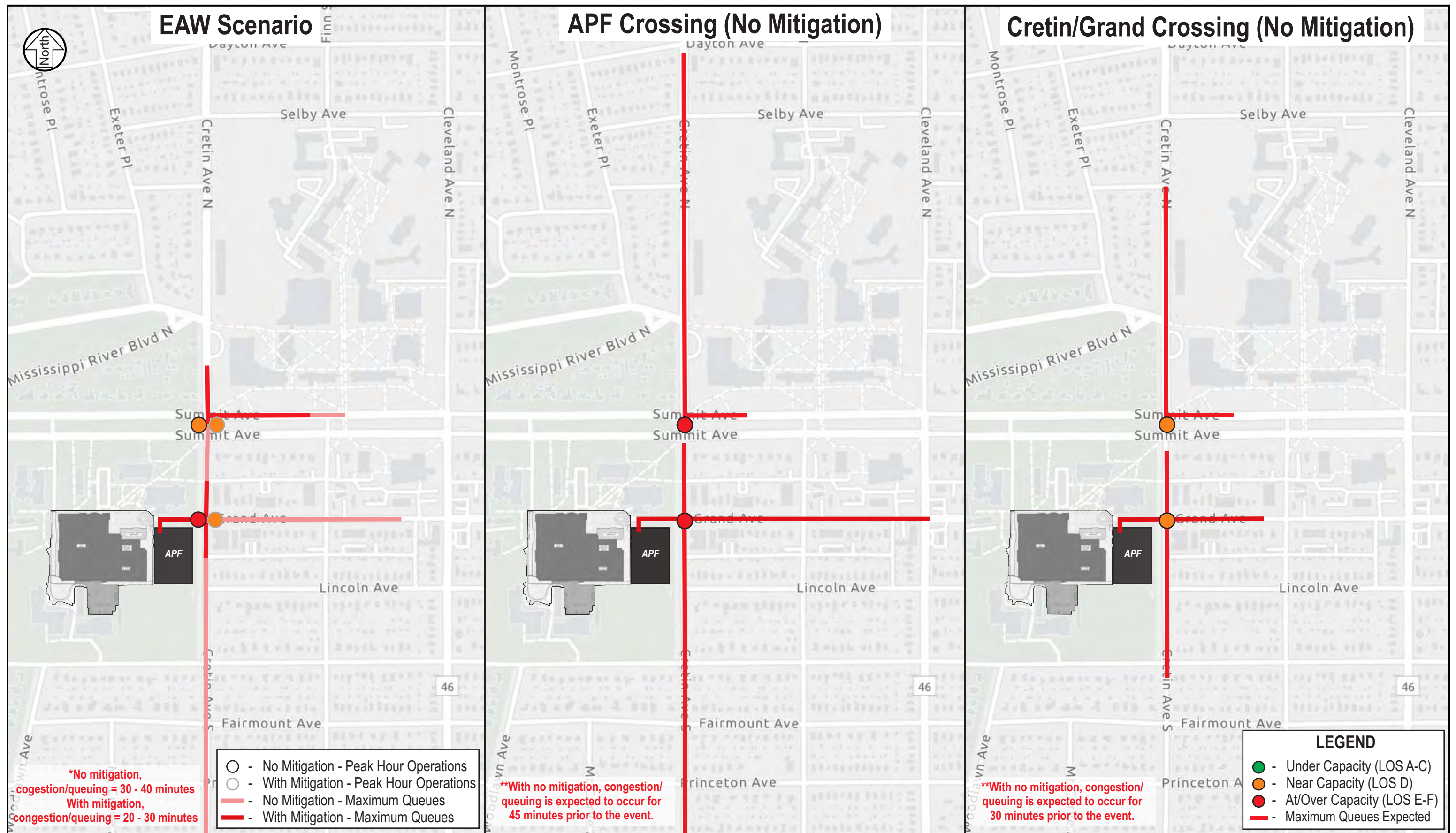
- **EAW Scenario** – This scenario is representative of the “No Mitigation” and “With Mitigation” analysis completed within the EAW. The west side of the APF was assumed to provide a direct pedestrian connection between the APF and the Arena. The “With Mitigation” analysis mainly consisted of implementing designated pedestrian routes to limit any pedestrian crossings of Grand Avenue or the APF ramp.
- **APF Crossing** – Pedestrians to/from the APF are assumed to enter/exit the northeast APF stairwell, utilize the sidewalk on the south side of Grand Avenue, and cross the APF vehicular access. Parking attendants and/or traffic control officers are assumed to be located at the APF vehicular access to safely manage the pedestrian/vehicular interactions.
- **Cretin/Grand Crossing** – Pedestrians to/from the APF are assumed to enter/exit the northeast APF stairwell and cross Grand Avenue at the Cretin Avenue/Grand Avenue intersection. All APF users are assumed to utilize the sidewalk on the north side of Grand Avenue. The sidewalk on the south side of Grand Avenue is assumed to be closed through the use of barricades, cones, and/or wayfinding signage.

Max Capacity - Pre-Event Operations

An illustrative summary of the pre-event operations is shown in Figure 1. With the APF primarily utilized for event parking (691 spaces), over 1,700 pedestrians are expected to exit the ramp during the pre-event peak hour. This results in a pedestrian/vehicular conflict for APF users that reduces vehicle efficiencies entering the ramp and aligns with “Issue 1A” within the EAW.

Under the APF Crossing alternative, maximum queues are expected to extend to Dayton Avenue to the north and Sargent Avenue to the south during pre-event conditions. Note these operations are expected to be worse than the “No Mitigation” analysis scenario within the EAW.

The Cretin/Grand Crossing alternative operates much better than the APF Crossing alternative. This is due to a combination of larger pedestrian storage areas/crossing widths and that the pedestrian crossing at the intersection provides the ability (i.e. functions as a meter) to help clear APF entering queues. Under this scenario, maximum queues are expected to extend to Riverwood Place to the north and Goodrich Avenue to the south during pre-event conditions, which is similar to maximum queues within the “No Mitigation” analysis scenario within the EAW. Additional mitigation strategies/improvements are recommended to help improve these conditions and are summarized in the following section.



Max Capacity - Post-Event Operations

While some post-event congestion is expected on adjacent roadways, the bottleneck is generally expected to be exiting the APF ramp. Therefore, post-event operations were summarized based on APF clearing times and shown in Table 1. Note these clearing times represent the total amount of time it takes to clear the APF ramp and does not represent the average delay that each APF user is expected to experience. Additional mitigation strategies/improvements are recommended to help improve these conditions and are summarized in the following section.

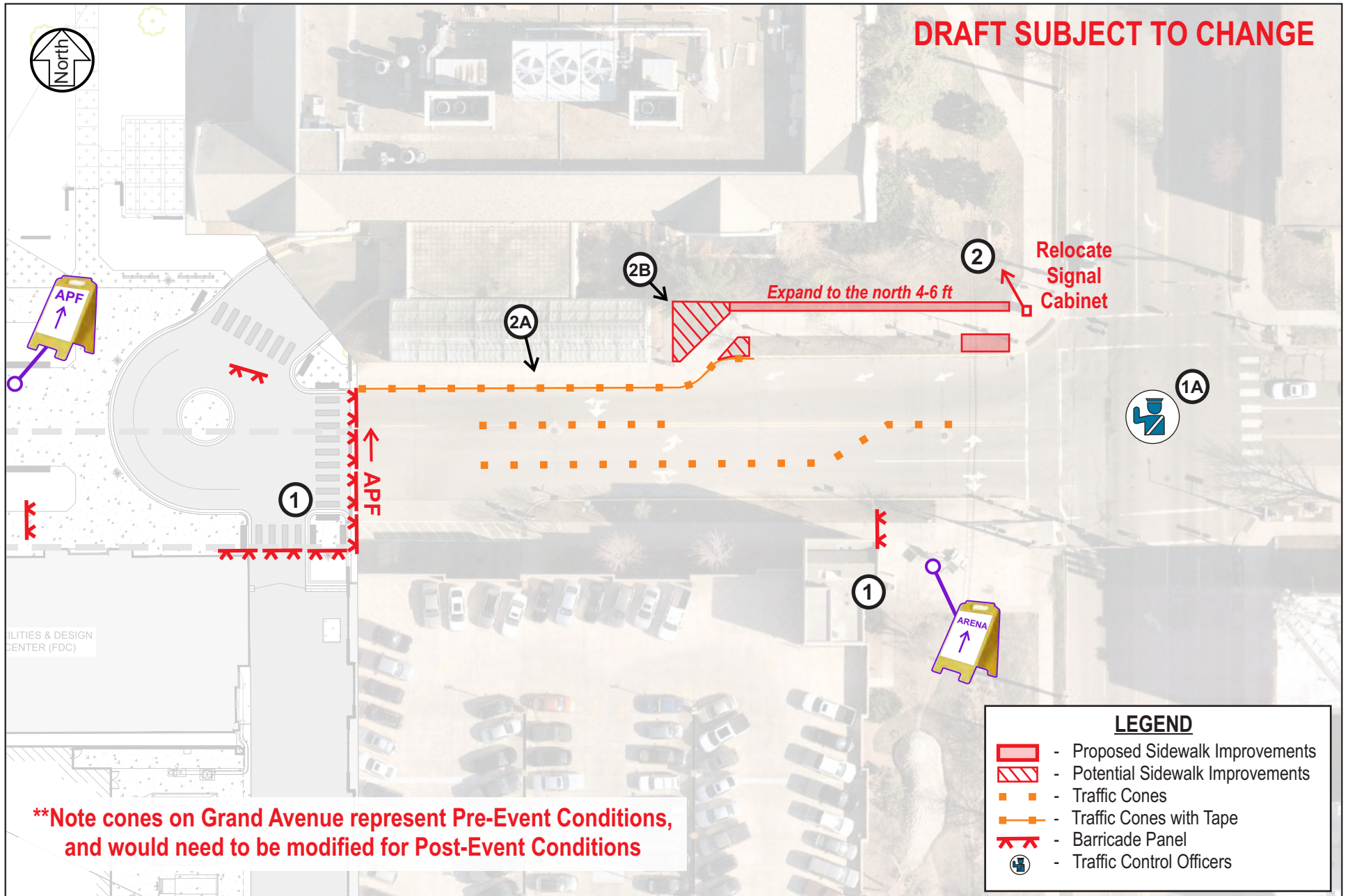
Table 1. APF Ramp Clearing Times

Scenario	Clearing Times
EAW Scenario (with Mitigation)	10-20 min
APF Crossing	30-45 min
Cretin/Grand Crossing	20-35 min

Event Management Recommendations

Based on the operations review, without a direct pedestrian connection from the APF to Arena, operations are expected to operate similar or worse than the “No Mitigation” scenario within the EAW. This is largely due to the amount of pedestrians that are expected to cross the vehicular entrance to the APF or the Cretin Avenue/Grand Avenue intersection. Therefore, the following mitigation strategies are recommended to help reduce event congestion and are summarized below and illustrated in Figure 2. With the mitigation improvements (1 and 2 only), the site is anticipated to operate similar to the “With Mitigation” scenario within the EAW, as shown in Figure 3.

- 1) Implement the “Cretin/Grand Crossing” alternative by closing the sidewalk on the South side of Grand Avenue and provide wayfinding signage to direct pedestrians to/from the Cretin Avenue/Grand Avenue intersection. The sidewalk closure can be accomplished through a combination of barricades, cones, and wayfinding signage.
 - a. Note multiple traffic control officers will need to be provided at the Cretin Avenue/Grand Avenue intersection in order to implement this alternative.
- 2) Widen the pedestrian facilities and crossings on the west side of the Cretin Avenue/Grand Avenue intersection and relocate the existing signal cabinet in the northwest quadrant, to help manage event pedestrian demand. Widening the effective pedestrian crossing width helps reduce pedestrian crossing times, which is expected to provide operational benefits for entering traffic. While the intersection crosswalk markings could be updated to reflect the increased crossing width, constructing the sidewalk improvements alone (in addition to clearing snow) is expected to be enough for pedestrians to utilize the space as an effective crossing. In addition, traffic control officers and/or “Stop Here on Red” signage officers can help ensure eastbound vehicles don’t intrude on the effective crosswalk.



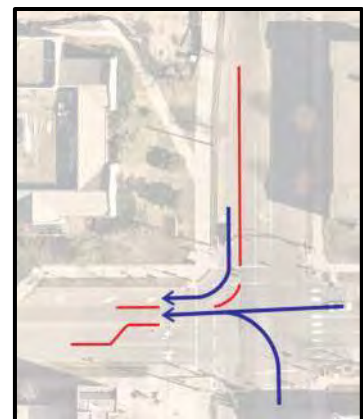


- a. Note the sidewalk immediately south of the medical garden is only approximately 8-foot wide and has limited flexibility for expansion. While this section may be a slight bottleneck for pedestrians, there is expected to be enough pedestrian storage on both sides (i.e. the APF plaza and the Cretin/Grand NW sidewalk improvements) to limit any pedestrian queuing issues. Additional cones with tape or other devices should be provided directly south of the sidewalk, adjacent to the medical garden, to limit any pedestrian spillover onto the roadway.
 - b. Additional sidewalk space could be considered east of the medical garden section to help funnel pedestrians during pre-event conditions.
- 3) Provide incentives to arrive early/stay late before and after an event. As mentioned previously, the pre-event operations analysis may be conservative based on data collected at similar facilities. Additional incentives could further spread-out arrival/departure times, which could provide operational and safety benefits.

Other Considerations

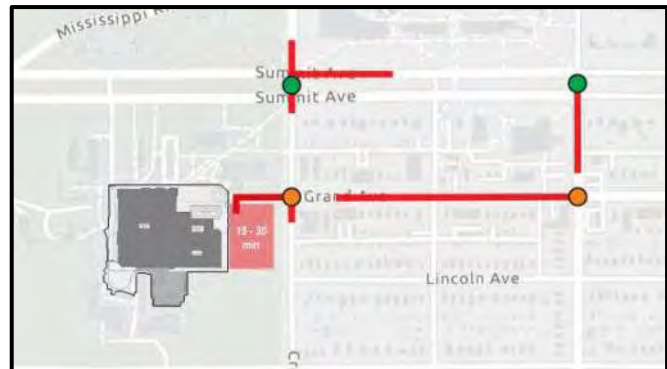
In addition to the strategies identified above, the following event management considerations are provided below and could be considered in the future if needed. Further discussion should occur with the project team as part of the Event Traffic Management Plan.

- Pre-event operations will be heavily dependent on APF service times/parking ticket checks entering the ramp. It should be noted that the analysis assumed two parking attendants (one per entering lane) would be checking pre-paid parking tickets. These operations will need to continue to be monitored and if queuing impacts occur the following strategies could be considered:
 - Increase entering efficiency by either providing additional parking attendants, utilizing one of the ramp exit lanes for entering, and/or refining the pre-paid parking system.
 - Relocate parking ticket checks to within the ramp to provide additional vehicular storage.
- A southbound right-turn only lane could be considered at the Cretin Avenue/Grand Avenue intersection during pre-event conditions. This strategy could be implemented through the use of cones, signage, and traffic control officers, and would provide the ability to allow southbound right-turn movements to occur simultaneously to northbound-left or westbound-thru movements. While this traffic control strategy could provide operational/queuing benefits, it would likely require a traffic control contractor, additional traffic control officers, and may be difficult to implement in the field. Therefore, this strategy should only be considered in the future if queuing issues occur.



- With the use of traffic control officers, the eastbound left-turn movement could be restricted during post-event conditions by converting the eastbound left-turn lane to an eastbound-thru and the eastbound thru-right to a right-turn only lane. Restricting the left-turn movement would greatly reduce pedestrian/vehicular conflicts along Cretin Avenue. A sensitivity analysis test was performed under the Cretin/Grand Crossing alternative, with the eastbound left-turn movement restricted. Results of the analysis, which is summarized in the inset, indicate that the APF ramp is expected to be cleared in 15 to 30 minutes under this scenario.

- This is anticipated to be the most efficient strategy to clear post-event congestion from the APF ramp and on the adjacent roadway network with the current APF pedestrian access. Post-event congestion is expected to be displaced to the Cleveland Avenue/Grand Avenue and Cleveland Avenue/Summit Avenue intersections, as shown in the inset, which would likely require implementing event signal timing modifications. The turn restrictions at Cretin Avenue, however, will result in a less direct route for event patrons and some users may use alternative local roadways to reach their destination.
- Further discussion with the project team should occur as part of the ETMP on whether to implement this strategy.



- The pedestrian facilities at the Cretin Avenue/Summit Avenue intersection are expected to be adequate. Traffic control officers are still recommended at the intersection during post-event conditions, to help clear traffic volumes from the APF ramp and improve pedestrian safety. If the eastbound left-turn restrictions are implemented at Cretin Avenue/Grand Avenue (see above), traffic control officers may no longer be needed at this location from an operations perspective.

Next Steps (Event Traffic Management Plan)

As part of the EAW Mitigation, an Event Traffic Management Plan (ETMP) is required to be developed, in consultation with the City of Saint Paul PED and Public Works Departments. As the project proceeds into the next phase, further refinement of the potential mitigation strategies is expected. The ETMP is expected to be a “living document” and mitigation/management strategies will be refined as events occur and a better understanding of event operations are experienced.

Appendix E

September 2023 Findings of Fact

UNIVERSITY OF ST. THOMAS MULTIPURPOSE ARENA

Findings of Fact

September 2023

Prepared for:



SAINT PAUL
MINNESOTA

Prepared by:

Kimley»Horn

TABLE OF CONTENTS

Administrative Background.....	1
Findings of Fact	1
Project Description.....	1
Corrections to the EAW or Changes to the Project Since the EAW was Published	2
Agency and Public Comments on the EAW.....	3
Mitigation Plan.....	3
Conclusions	5

LIST OF APPENDICES

- Appendix A: June 2023 EAW
- Appendix B: Agency Comments
- Appendix C: Public Comments
- Appendix D: Updated Site Plan

ADMINISTRATIVE BACKGROUND

The University of St. Thomas (UST), as the project proposer, is proposing to redevelop an approximately 6-acre site located on the University of St. Thomas South Campus in Saint Paul, Ramsey County, Minnesota. The proposed project will include one building to house a dual-purpose competition venue for the University's hockey and basketball programs with capacity for approximately 4,000 to 5,500 spectators. The project is also expected to include coaching offices, locker rooms, and student athlete support services including sports medicine, strength and conditioning, nutrition, and equipment. Additionally, two basketball practices facilities and an auxiliary ice sheet are expected. The arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs. Existing utility tunnels will connect the arena to nearby facilities, and a bridge will connect the third level of the arena to Anderson Parking Ramp. Three existing buildings will be demolished, and six existing surface parking lots will be partially or wholly demolished to accommodate the redevelopment.

The City of Saint Paul is the Responsible Governmental Unit (RGU) for this project. An Environmental Assessment Worksheet (EAW) has been prepared in accordance with Minnesota Rules Chapter 4410. The EAW was mandatory per Minnesota Rules, part 4410.4300, subpart 34: sports or entertainment facilities. The EAW was filed with the Minnesota Environmental Quality Board (EQB) and circulated for review and comment to the required distribution list. A notice of availability was published in the *EQB Monitor* on June 27, 2023. This notice included a description of the project, information on where copies of the EAW were available, and invited the public to provide comments.

The EAW was made available electronically on the City of Saint Paul's website at <https://www.stpaul.gov/departments/planning-and-economic-development/planning/current-activities/university-st-thomas>. Notice of availability was distributed through the City of Saint Paul's Electronic Notification System (ENS) and published in the Pioneer Press. An open house was held on July 12, 2023 from 6:30-8:00PM at McNeely Hall on the University of St. Thomas campus.

The EAW comment period extended from June 27, 2023, to July 27, 2023. Written comments were received from four agencies. Twenty-one public comments were also received. All comments were considered in determining the potential for significant potential environmental impacts.

Based on the information in the record, which is composed of the EAW for the proposed project, the comments submitted during the public comment period, the responses to comments, and other supporting documents, the City of Saint Paul makes the following Findings of Fact and Conclusions.

FINDINGS OF FACT

Project Description

The University of St. Thomas is proposing to redevelop an approximately 6-acre site located on the University of St. Thomas South Campus in Saint Paul, Minnesota. The proposed project will include a multi-purpose competition venue for the University's hockey and basketball programs with capacity for approximately 4,000- to 5,500 spectators. The project is also expected to include practice facilities, coaching offices, locker

rooms, and student athlete support services and will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs. The new facility will be designed to meet a LEED Silver rating¹. There are three existing campus buildings with adjacent surface parking lots on site that will be demolished.

Corrections to the EAW or Changes to the Project Since the EAW was Published

A number of clarifications have been made in response to public comments. Corrections and additional information are included below. Please see Appendix A for the EAW published in June 2023 and Appendix D for an updated site plan that shows the new southeast Cretin Ave access point.

Per recommendation from the Minnesota Department of Natural Resources (DNR), an addition to Section 14.a. of the EAW is included. The project site is located within the Mississippi River Twin Cities Important Bird Area (IBA)². The Mississippi River IBA includes the Mississippi River and its adjacent floodplain forest and upland areas extending for 38 river miles through 4 counties from Minneapolis to Hastings. According to the MN DNR, IBAs are a voluntary and non-regulatory part of an international conservation effort to bird populations³. As indicated in Section 14.a. of the EAW, the site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation.

The MN DNR has completed a Natural Heritage Review for the proposed project. The NHIS review indicated that although no bat records are listed in the NHIS in the vicinity of the project site, all seven of Minnesota's bats, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. To minimize impacts to bat species, the MN DNR recommends that tree removal be avoided from June 1 through August 15, during the active bat season.

The NHIS review indicated that the project site is located within a high potential zone of the federally endangered rusty patched bumble bee (*Bombus affinis*). According to the DNR, the rusty patched bumble bee is likely to be present in suitable habitat within high potential zones. From April through October, the rusty patched bumble bee uses underground nests in upland grasslands, shrublands, and forest edges, and forages where nectar and pollen are available. From October through April, the species overwinters under tree litter in upland forests and woodlands. As indicated in Section 14.a of the EAW, the disturbed nature of the site does not provide suitable habitat. If applicable, the DNR recommends reseeding disturbed soils with native species of grasses and forbs using Board of Water and Soil Resources (BWSR) or Minnesota Department of Transportation (MnDOT) seed mixes. To ensure compliance with federal law, the DNR recommends that the

¹ The USGBC's LEED green building program provides a framework for improving building performance and the responsible use of energy, water, and material resources through design, construction, and ongoing operations. Achieving certification demonstrates a project's verified implementation of these strategies and commitment to supporting a healthier, more sustainable community.

² <https://netapp.audubon.org/iba/Reports/2421>

³ <https://www.dnr.state.mn.us/iba/index.html>

project conduct a federal regulatory review using the U.S. Fish and Wildlife Service’s (USFWS) online Information for Planning and Consultation (IPaC) tool.

Agency and Public Comments on the EAW

During the comment period, the City of Saint Paul received written comments from the U.S. Army Corps of Engineers (USACE) (two letters), Minnesota Department of Transportation (MnDOT), Minnesota Department of Natural Resources, and Metropolitan Council. The City of Saint Paul received an additional 21 written comments from the public.

Consistent with state environmental rules, responses have been prepared for all substantive comments received during the comment period. The following tables contain response to agency and public comments. Copies of the agency and public comments received are included in Appendix B and C, respectively.

Mitigation Plan

The EAW and comments received identify potential impacts of the proposed project in a number of areas, including traffic and parking impacts, visual impacts, impacts to wildlife and water quality (including removal of mature trees), noise impacts, impacts related to GHG emissions and climate change, and cumulative potential impacts. Based on the record, the City of Saint Paul as RGU has determined that based on the criteria provided:

The proposed arena will have a maximum capacity of approximately 5,500 attendees for basketball events and 4,000 attendees for hockey events. The EAW estimated both typical and max attendance for sporting events which exceed capacity at current facilities used by UST. This analysis was based on observed attendance at similar facilities in the Division 1 NCAA athletic conference that UST is a member of. Attendance for typical events was estimated at 3,000 and attendance for max events at the physical capacity of the facility of 5,500. Parking impacts were evaluated based on projected event frequency at typical and max capacity events. Max capacity events for basketball (5,500 attendees) were projected to occur 0-2 times annually (1 weeknight and 1 Saturday evening event each), and max hockey events (4,000 attendees) 4 times annually (Friday and Saturday night events, 2 each). Projected off-street parking deficits for Thursday/weeknight and Saturday evening events were 742 and 330, respectively [1]. In addition to sporting events, the arena is proposed to host other university events, but the frequency and size of these events is not discussed in the EAW.

Potential traffic impacts were evaluated for a maximum attendance event. The EAW includes “level of service” (LOS) ratings for the max attendance scenario both with and without event traffic management strategies, which are often documented within an event traffic management plan. Event traffic management plans help facilitate vehicular traffic flow and enhance safety for pedestrians. Note the analysis did not assume a transportation management demand plan (TDMP), which would facilitate use by attendees of modes of travel other than by private automobile. The LOS ratings indicate that there would be notable impacts to traffic in the immediate vicinity of the proposed arena, particularly at the intersections of Cretin Avenue with Grand and Goodrich Avenues, the latter being unsignalized. The EAW also notes that left-turn

movements onto Cretin at unsignalized intersections would be particularly impaired for short durations (15 to 30 minutes) before and after an event.

Recommended Mitigation

Based on the nature and extent of the potential impacts, and building on the strategies identified in the EAW, City of Saint Paul staff recommend the following mitigation measures. Implementation should be tied to issuance of a Certificate of Occupancy. Please note the mandatory language (i.e., “will”) for strategies; it should be understood that alternative strategies or components of strategies that result in a substantially similar or better mitigation will be considered acceptable.

1. St. Thomas has agreed to monitor event attendance, traffic, and parking for no less than two operational years after the Multipurpose Arena is occupied.
2. Event Traffic Management: St. Thomas has agreed to develop, in consultation with Saint Paul PD and Public Works, an Event Traffic Management Plan, including strategies for traffic control. The plan will tie specific strategies to event size and timing. In addition to collegiate hockey and basketball, the plan will also cover any other planned/potential events at the Multipurpose Arena.
3. Parking Management: St. Thomas has agreed to establish incentives for the use of public transportation and/or rideshare when attending events at the Multipurpose Arena. St. Thomas will also implement reasonable parking system applications to inform patrons what lots are sold out/full for major events to encourage the use of transit, rideshare or carpool, and will provide off-site parking and shuttle service to provide alternatives to on-campus parking when large events occur at the Multipurpose Arena.
4. Non-sporting Events. St. Thomas has agreed to maintain a list of potential events other collegiate sports to be held at the arena, including the type, number, frequency, and timing of such events.
5. Community Engagement. St. Thomas will work to keep the community informed of upcoming events through the neighborhood relations website <http://www.stthomas.edu/neighbors> as well as provide regular communications from the email list-serve. A dedicated email can also be used for neighbor concerns at: neighbors@stthomas.edu.

CONCLUSIONS

1. All requirements for environmental review of the proposed project have been met.
2. The EAW and the permit development processes related to the project have generated information that is adequate to determine whether the project has the potential for significant environmental effects.
1. Areas where potential environmental effects have been identified will be addressed during the final design of the project. If the project were to proceed, it would be subject to regulatory authority which will be sufficient to implement mitigation necessary to address potential environmental effects. Mitigation will be provided where impacts are expected to result from project construction, operation, or maintenance. Mitigation measures are incorporated into project design and have been or will be coordinated with state and federal agencies during the permit process (see page 3 for the Mitigation Plan).
2. Based on the criteria in Minnesota Rules, part 4410.1700, the project does not have the potential for significant environmental effects.

An environmental impact statement is not required for the proposed project.

Signature Nicolle Goodman
Nicolle Goodman (Sep 26, 2023 15:45 CDT)

Title Director, Department of Planning and Economic Development

Date Sep 26, 2023

APPENDIX A

June 2023 EAW

University of St. Thomas Multipurpose Arena

Environmental Assessment Worksheet

June 2023

Prepared for:



SAINT PAUL
MINNESOTA

Prepared by:

Kimley»»Horn

Table of Contents

1. Project Title	1
2. Proposer.....	1
3. RGU	1
4. Reason for EAW Preparation	2
5. Project Location.....	2
6. Project Description.....	2
7. Climate Adaption and Resilience.....	4
8. Cover Types.....	10
9. Permits and Approvals Required	11
10. Land Use	12
11. Geology, Soils, and Topography/Landforms.....	15
12. Water Resources.....	16
13. Contamination/Hazardous Materials/Wastes.....	22
14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features).....	24
15. Historic Properties.....	28
16. Visual.....	29
17. Air.....	30
18. Greenhouse Gas (GHG) Emissions/Carbon Footprint.....	31
19. Noise.....	34
20. Transportation.....	35
21. Cumulative Potential Effects	39
22. Other Potential Environmental Effects.....	40
RGU Certification	41

List of Tables

Table 1: Project Magnitude.....	4
Table 2: Climate Considerations and Adaptations.....	7
Table 3: Cover Types.....	10
Table 4: Green Infrastructure.....	10
Table 5: Trees.....	10
Table 6: Permits and Approvals Required	11
Table 7: What’s in My Neighborhood Sites	22
Table 8: State-Listed Threatened and Endangered Species.....	26
Table 9: Historic Properties within 500 feet of the Project Site.....	28
Table 10: Existing Operational Emissions	32
Table 11: Construction Emissions	33
Table 12: Proposed Operational Emissions.....	33
Table 13: Event parking Demand Analysis	37
Table 14: LOS Summary.....	38

List of Figures

Figure 1: County Map.....	43
Figure 2: USGS Map.....	44
Figure 3: Existing Conditions.....	45
Figure 4: Existing Land Use.....	46
Figure 5: Existing Zoning.....	47
Figure 6: Zoning Overlay Districts.....	48
Figure 7: Water Resources.....	49
Figure 8: What’s In My Neighborhood Sites Within 200 feet of the Project Site.....	50
Figure 9: Historic Resources Within 500 feet of the Project Site.....	51

List of Appendices

- Appendix A: Site Plan
- Appendix B: Agency Correspondence
- Appendix C: Greenhouse Gas (GHG) Analysis
- Appendix D: Traffic Impact Analysis

Environmental Assessment Worksheet

This most recent Environmental Assessment Worksheet (EAW) form and guidance documents are available at the Environmental Quality Board's (EQB's) website at: <https://www.eqb.state.mn.us>. The EAW form provides information about a project that may have the potential for significant environmental effects. Guidance documents provide additional detail and links to resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item or can be addressed collectively under EAW Item 21.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation, and the need for an EIS.

1. Project Title

University of St. Thomas Multipurpose Arena

2. Proposer

Proposer: University of St. Thomas

Contact Person: Anthony Adams, PE

Title: Senior Civil Engineer

Address: 533 South Third Street, Suite 100

City, State, ZIP: Minneapolis, MN 55415

Phone: 612-492-4741

Email: Anthony.Adams@ryancompanies.com

3. RGU

RGU: City of Saint Paul

Contact Person: Josh Williams

Title: Principal Planner

Address: 25 West Fourth Street

City, State, ZIP: Saint Paul, MN 55102

Phone: 651-266-6659

Email: josh.williams@ci.stpaul.mn.us

4. Reason for EAW Preparation

Check one:

Required:

EIS Scoping

Mandatory EAW

Discretionary:

Citizen petition

RGU discretion

Proposer initiated

If EAW or EIS is mandatory, give EQB rule category subpart number(s) and name(s):

Minnesota Rules, part 4410.4300, subpart 34 (sports or entertainment facilities)

5. Project Location

County: Ramsey

City/Township: Saint Paul

PLS Location (1/4, 1/4, Section, Township, Range): NW 1/4, SE 1/4, Section 5, Township 28N, Range 23W

Watershed (81 major watershed scale): Mississippi River – Twin Cities

GPS Coordinates: 44.9396077, -93.1946973

Tax Parcel Number: 052823420005, 052823420004

At a minimum, attach each of the following to the EAW:

- **County map showing the general location of the project** (see Figure 1)
- **US Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries** (see Figure 2)
- **Site plans showing all significant project and natural features. Pre-construction site plan and post-construction site plan.** (see Figure 3 and Appendix A)
- **List of data sources, models, and other resources (from the Item-by-Item Guidance: *Climate Adaptation and Resilience* or other) used for information about current Minnesota climate trends and how climate change is anticipated to affect the general location of the project during the life of the project (as detailed below in Item 7).**

6. Project Description

- a. **Provide the brief project summary to be published in the *EQB Monitor* (approximately 50 words).**

The proposed University of St. Thomas Multipurpose Arena will be a redevelopment of an approximately 6-acre site located on the University of St. Thomas South Campus in Saint Paul, Minnesota. The proposed project will include a multi-purpose competition venue for the University's hockey and basketball programs with capacity for approximately 4,000 to 5,500 spectators. The project is also expected to include practice facilities, coaching offices, locker rooms, and student athlete support services and will host other university events such as commencement ceremonies, academic convocations, speakers, career fairs, and other

events for the university. The new facility will be designed to meet a LEED Silver rating¹. There are three existing campus buildings with adjacent surface parking lots on site that will be demolished.

- b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion, include a description of the existing facility. Emphasize 1) construction and operation methods and features that will cause physical manipulation of the environment or will produce wastes; 2) modifications to existing equipment or industrial processes; 3) significant demolition, removal, or remodeling of existing structures; and 4) timing and duration of construction activities.**

The 6-acre University of St. Thomas Multipurpose Arena (Lee and Penny Anderson Arena at the University of St. Thomas) project site is located on the University of St. Thomas South Campus, bounded to the north by Summit Avenue, the east by Cretin Avenue, the South by Goodrich Avenue, and the west by Mississippi River Boulevard South. See Figure 1 and Figure 2 for project location and Figure 3 for existing site conditions.

The proposed project will include one building to house a dual-purpose competition venue for the University's hockey and basketball programs with capacity for approximately 4,000 to 5,500 spectators. The project is also expected to include coaching offices, locker rooms, and student athlete support services including sports medicine, strength and conditioning, nutrition, and equipment. Additionally, two basketball practice facilities and an auxiliary ice sheet are expected. The arena will host other university events such as commencement ceremonies, academic convocations, speakers, career fairs, and other events for the university. Existing utility tunnels will connect the arena to nearby facilities, and a bridge will connect the third level of the arena to Anderson Parking Ramp. The concept plan is included in Appendix A.

Three existing buildings on the site will be demolished to accommodate the redevelopment: Cretin Hall, Service Center, and McCarthy Gymnasium. Existing surface parking lots will be demolished to accommodate the redevelopment: Lot N, Lot P1, Lot V, Lot X, Lot Y, and a portion of Lot O (38 spaces to remain after reconstruction). Utility relocations and extensions are expected to accommodate facility construction. No onsite parking is expected to be constructed in the redevelopment as existing parking elsewhere within the University campus is to be used. Vehicular access to the facility will consist of loading zones via an access drive on the western boundary of the project site and via the termination of Grand Avenue in the northeast part of the project site.

Construction methods are expected to be typical of new buildings on the University of St. Thomas campus and may include poured in place concrete spread footing and concrete foundation walls with limited drilled piers and temporary earth retention system possibilities adjacent to existing buildings. Construction is anticipated to begin in spring 2024 and be

¹ The USGBC's LEED green building program provides a framework for improving building performance and the responsible use of energy, water, and material resources through design, construction, and ongoing operations. Achieving certification demonstrates a project's verified implementation of these strategies and commitment to supporting a healthier, more sustainable community.

complete by fall 2025. The project may complete some early utility work in the Fall of 2023 to prepare the site.

c. Project magnitude

Table 1: Project Magnitude

Measure	Magnitude
Total Project Acreage	6 acres
Institutional Building Area (square feet)	270,000 square feet
Structure Height(s)	58 feet 3 inches (Main Arena) 66 feet (Basketball Practice Facilities) 81 feet 11 inches (Raised parapets for stair/elevator overruns and/or mechanical screening)

d. Explain the project purpose. If the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

The purpose of this project is to redevelop a portion of the University of St. Thomas South Campus into a multipurpose arena to house a competition venue for the University's hockey and basketball programs to meet Division I athletic program expectations.

e. Are future stages of this development, including development on any other property, planned or likely to happen? Yes No

If yes, briefly describe future stages, relationship to present project, timeline, and plans for environmental review.

The Anderson Parking Facility is an existing parking ramp that was designed for a future expansion of two additional floors. The expansion is discussed as a potential improvement in the Traffic Impact Analysis (Appendix D); however, is not currently planned or funded at this time.

f. Is this project a subsequent stage of an earlier project? Yes No

If yes, briefly describe the past development, timeline, and past environmental review.

Not applicable.

7. Climate Adaption and Resilience

a. Describe the climate trends in the general location of the project (see guidance: *Climate Adaptation and Resilience*) and how climate change is anticipated to affect that location during the life of the project.

Trends in temperature, precipitation, flood risk, and cooling degree days are described below for the general project location. Some of the climate projections summarized below use Representative Concentration Pathways (RCPs), which are greenhouse gas concentration scenarios used by the Intergovernmental Panel on Climate Change. RCP 4.5 is an

intermediate scenario in which emissions decline after peaking around 2040, and RCP 8.5 is a worst-case scenario in which emissions continue to rise through the century.²

Temperature

According to the Minnesota Climate Explorer,³ the historical average temperature in Ramsey County between 2002 and 2022 was approximately 45.66°F, with the lowest average in 2014 (41.53°F) and the highest average in 2012 (49.17°F). The average annual temperature in Ramsey County is projected to be 49.53°F from 2040-2059 under RCP 4.5. From 2080-2099, the average annual temperature is projected to be 51.91°F and 55.68°F under RCP 4.5 and RCP 8.5, respectively⁴.

Urban Heat Island

Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council's Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat.⁵

Precipitation

According to the Minnesota Climate Explorer, historic average precipitation in Ramsey County between 2002 and 2022 was approximately 31.34 inches, with the lowest average in 2022 (21.78 inches) and the highest average in 2016 (41.13 inches). Average annual precipitation in Ramsey County from 2040 to 2059 is projected to be 32.95 inches under RCP 4.5. From 2080 to 2099, average annual precipitation is projected to be 33.51 inches and 35.97 inches under RCP 4.5 and RCP 8.5, respectively.

Localized Flood Risk

The Metropolitan Council's Localized Flood Map Screening Tool⁶ identifies localized flood hazards, referred to as Bluespots, which are broken into categories based on potential flood water depth. This tool shows several Bluespots within the project site. Multiple Primary and Shallow Bluespots are mapped in the northern part of the project site along Grand Avenue and in surface parking lots, with a maximum depth of 1.60 feet. A Shallow Bluespot is located along McCarthy Gymnasium in the eastern part of the project site, with a maximum depth of 0.28 feet. There are also Primary and Shallow Bluespots in the southwest portion of the project site, with a maximum depth of 1.74 feet. Primary Bluespots are the first areas to fill with water and are generally considered higher risk, while Shallow Bluespots are separate, isolated low areas generally considered low risk.

² Climate Explorer Metadata. Available at <https://www.dnr.state.mn.us/climate/climate-explorer-metadata.html>.

³ Minnesota Climate Explorer. Minnesota Department of Natural Resources. Available at <https://arcgis.dnr.state.mn.us/ewr/climateexplorer/main/historical>.

⁴ The timeframe of 2060-2079 is not included because it is not one of the models in the Climate Explorer analysis.

⁵ Extreme Heat Map Tool. Metropolitan Council. Available at <https://metro council.org/Communities/Planning/Local-Planning-Assistance/CVA/Tools-Resources.aspx>.

⁶ Localized Flood Map Screening Tool. Metropolitan Council. Available at <https://metro council.org/Communities/Planning/Local-Planning-Assistance/CVA/Tools-Resources.aspx>.

Cooling Degree Days

As defined by the National Weather Service, Cooling degree days, which are often used as a proxy to estimate cooling needs for buildings, can be examined as a baseline and projected exposure indicator under the RCP 4.5 and RCP 8.5 scenarios. Cooling degree days are indexed units, not actual days, which roughly describe the demand to heat or cool a building. Cooling degree days accumulate on days warmer than 65°F when cooling is required. For example, if a weather station recorded an average daily temperature of 78°F, cooling degree days for that station would be 13⁷..⁸ Cooling degree days are used as a proxy to estimate cooling needs for buildings.

According to Heat Vulnerability in Minnesota,⁹ the number of cooling degree days in 2019 for Ramsey County was 374. The number of cooling degree days in 2050 for Ramsey County is projected to be 450 and 593 for RCP 4.5 and RCP 8.5, respectively.

- b. For each resource category in the table below, describe the project's proposed activities and how the project's design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.**

Climate considerations and adaptations for the proposed project are described in Table 2.

⁷ Heat Vulnerability in Minnesota. Available at: https://maps.umn.edu/climatehealthtool/heat_app/

⁸ "What Are Heating and Cooling Degree Days." National Weather Service. Available at https://www.weather.gov/key/climate_heat_cool.

⁹ Heat Vulnerability in Minnesota. Minnesota Department of Health and the University of Minnesota. Available at https://maps.umn.edu/climatehealthtool/heat_app/.

Table 2: Climate Considerations and Adaptations

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
Project Design	Aspects of the building architecture/materials choices and site design that may negatively affect urban heat island conditions in the area considering changing climate zones, temperature trends, and potential for extended heat waves.	The site is located in an area that experiences urban heat island effect ¹⁰ . Additionally, projected climate trends include increased temperature and precipitation, and increased frequency of freeze/thaw cycles.	<ul style="list-style-type: none"> • University of St. Thomas is considering ways to design landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff and mitigate for the urban heat island effect. Additionally, these stormwater facilities would improve water quality and stormwater runoff in the project vicinity through using minimal turfgrass, which will reduce irrigation needs, as well as the use of native pollinating perennials, which after 2-3 years period generally do not require irrigation. Plantings around the building perimeter will be salt-tolerant and tolerant of harsh sites, urban settings. For more information on this topic, see Section 12. • University of St. Thomas has committed to building LEED-certified facilities that can be designed to use less energy and water • The following measures provide increased reliability and energy efficiency in the arena to reduce emissions: <ul style="list-style-type: none"> ○ Redundant chiller design and incorporation of glycol into supply

¹⁰ Defined by the Environmental Protection Agency as “urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun’s heat more than natural landscapes such as forests and water bodies. Urban areas, where these structures are highly concentrated and greenery is limited, become “islands” of higher temperatures relative to outlying areas.” Source: <https://www.epa.gov/heatislands>

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
			<p>loop for all cooling coils will protect from freezing conditions and ensure systems remain operational.</p> <ul style="list-style-type: none"> ○ Chillers will use next-generation refrigerants with low global warming potential. ○ The boiler system will include n+1 redundancy and freeze protection. ○ The project is being considered for connection to the campus microgrid for back-up power during outages or emergency events. <ul style="list-style-type: none"> ● These efficiencies reduce heat emitted from the buildings and their HVAC systems and reduces indoor and outdoor exposure to heat, which is one of the impacts of the heat island effect.¹¹
Land Use	No critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those with housing occupants who may be insufficiently mobile) are proposed, and the study area has a low risk of localized flooding.	The proposed development is in an area with low flood risk.	University of St. Thomas will investigate ways to design the stormwater management facilities to minimize standing water and reduce the risk of flooding on the project site.

¹¹ Source: <https://www.sciencedirect.com/science/article/pii/S2666278722000083>

Resource Category	Climate Considerations	Project Information	
		Climate Change Risks and Vulnerabilities	Adaptations
Water Resources	Changes in land cover caused by the project could affect site surface hydrology, resulting in more stormwater runoff and nutrient loading	<ul style="list-style-type: none"> Changes in weather patterns may cause a higher frequency of freeze/thaw cycles, resulting in the need for increased salting. Chlorides from salting degrade nearby water quality and impact aquatic life. 	<ul style="list-style-type: none"> The stormwater system will be sized for the additional impervious areas and changes in stormwater requirements. The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting which includes pretreatment, removal, de-icing, and clean up <p>For more information on this topic, see Section 12.</p>
Contamination/ Hazardous Materials/ Wastes	Current Minnesota climate trends and anticipated climate change in the general location of the project may influence the potential environmental effects of generation/ use/storage of hazardous waste and materials.	Increased moisture added to waste material or debris, which will in turn increase methane gas production and add to greenhouse gases.	Any hazardous waste products generated or stored within the proposed development will be registered and kept in accordance with Minnesota Pollution Control Agency (MPCA) requirements. For more information on this topic, see Section 13.
Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)	Current Minnesota climate trends and anticipated climate change in the general location of the project may influence local species and suitable habitat.	Suitable habitat for local species may become unsuitable due to land use changes, increased temperature, and increased runoff.	University of St. Thomas is investigating ways to minimize tree removals or replace more trees than are removed and include non-invasive native plants, resulting in a net gain of suitable habitat for local species including small mammals, insects, and birds. For more information on this topic, see Section 14.

8. Cover Types

Estimate the acreage of the site with each of the following cover types before and after development.

Estimated cover type acreages within the project site before and after development are provided in Table 3. Green infrastructure and tree canopy acreages before and after site development are provided in Table 4 and Table 5.

Table 3: Cover Types

Cover Type	Before (Acres)	After (Acres)
Wetlands and Shallow Lakes (less than 2 meters deep)	0.0	0.0
Deep Lakes (more than 2 meters deep)	0.0	0.0
Rivers/Streams	0.0	0.0
Wooded/Forest	0.0	0.0
Brush/Grassland	0.0	0.0
Cropland	0.0	0.0
Livestock Rangeland/Pastureland	0.0	0.0
Lawn/Landscaping	1.3	0.3
Green Infrastructure (total from Table 4)	0.0	0.0
Impervious Surface	4.8	5.8
Stormwater Pond (wet sedimentation basin)	0.0	0.0
Other (describe)	0.0	0.0
Total	6.	6

Table 4: Green Infrastructure

Green Infrastructure	Before (Acres)	After (Acres)
Constructed Infiltration Systems (infiltration basins, infiltration trenches, rainwater gardens, bioretention areas without underdrains, swales with impermeable check dams)	0.0	0.0
Constructed Tree Trenches and Tree Boxes	0.0	0.0
Constructed Wetlands	0.0	0.0
Constructed Green Roofs	0.0	0.0
Constructed Permeable Pavements	0.0	0.0
Other (describe)	0.0	0.0
Total	0.0	0.0

The specifics of potential proposed green infrastructure will be determined as design advances and will be addressed through the City's entitlement process as well as watershed district and MPCA requirements.

Table 5: Trees

Trees	Number
Number of Mature Trees Removed During Development	76

Trees	Number
Number of New Trees Planted	50 ¹²

9. Permits and Approvals Required

List all known local, state, and federal permits, approvals, certifications, and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. *All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules Chapter 4410.3100.*

Table 6: Permits and Approvals Required

Unit of Government	Type of Application	Status
Federal		
Federal Aviation Administration	Notice of Proposed Construction or Alteration	To be applied for
State		
Minnesota Department of Health	Water Main Installation Permit	To be applied for, if applicable
	Well Sealing Notification	To be applied for
Minnesota Department of Natural Resources	Water Appropriation Permit	To be applied for, if applicable
Minnesota Pollution Control Agency	Construction Contingency Plan and Response Action Plan Approval	To be applied for, if applicable
	Disturbance Permit	To be applied for, if applicable
	Notice of Intent of Demolition	To be applied for, if applicable
	National Pollutant Discharge Elimination System Permit	To be applied for
	Sanitary Sewer Extension Permit	To be applied for, if applicable
Regional		
Metropolitan Council	Sewer Connection Permit	To be applied for, if applicable
Capitol Region Watershed District	Permit for Stormwater Management	To be applied for
	Permit for Erosion and Sediment Control	To be applied for
Local		
Ramsey County	Right-of-Way Permit	To be applied for, if applicable
	Road Access Permit	To be applied for, if applicable

¹² The University of St. Thomas has plans for at least 26 trees to be planted elsewhere on campus, outside of the EAW site area, in order to replace or exceed the amount of trees removed from the project. Final locations of the trees will be determined as the project design advances.

Unit of Government	Type of Application	Status
	Demolition Permit and Pre-Demolition Inspection	To be applied for, if applicable
City of Saint Paul	Building Permit	To be applied for
	Certificate of Occupancy	To be applied for
	Demolition Permit	To be applied for
	Electrical Permits and Inspections	To be applied for
	Excavation Permit	To be applied for
	Fire Engineering Permits and Inspections	To be applied for, if applicable
	Grading/Fill Permit and Inspections	To be applied for
	Heritage Preservation Commission Design Review	To be applied for
	Mechanical Permits and Inspections	To be applied for
	Obstruction Permit	To be applied for, if applicable
	Plumbing/Gas Permits and Inspections	To be applied for
	Right-of-Way Plan Review	To be applied for, if applicable
	Sewer Permits	To be applied for
	Sidewalk Permit	To be applied for, if applicable
	Sign Permit	To be applied for
	Site Plan Review	To be applied for
Tank Permit	To be applied for, if applicable	
Plumbing Permit	To be applied for	
	Transportation Demand Management Plan	To be applied for
Saint Paul Regional Water Services	Hydrant Permit	To be applied for
	Backflow Preventer Permit (and Testing)	To be applied for
	Water Main Installation	To be applied for

10. Land Use

a. Describe:

- i. Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, and prime or unique farmlands.**

The existing site is part of the University of St. Thomas campus and includes several buildings (Cretin Hall, Service Center, McCarthy Gymnasium), surface parking lots (Lots N, O, P1, V, X, and Y), and sidewalks (see Figure 3). Adjacent existing land use is institutional in all directions (the University of St. Thomas and St. Paul Seminary

campuses). Beyond campus to the north lies park/recreational and residential land, to the east lies residential and mixed-use land, to the south lies residential properties, and to the west lies park/recreational/preserve and open water (see Figure 4).

There are two parks within ¼ mile of the project site: Mississippi Gorge Regional Park to the west and Shadow Falls Park to the northwest. The Mississippi Gorge East River Parkway Trail extends through both parks.

There are no cemeteries or prime or unique farmland within or adjacent to the project site.

ii. Planned land use as identified in comprehensive plans (if available) and any other applicable plan for land use, water, or resource management by a local, regional, state, or federal agency.

In 2020, the City of Saint Paul adopted the *2040 Comprehensive Plan* to guide development in the city over the next 20 years.

The *2040 Comprehensive Plan* Future Land Use map designates the project site as Civic and Institutional, which includes building and open space for major institutional campuses. Three policies apply to the Civic and Institutional land use category; however, one is specific to the Capitol Area and is not applicable to the project site. Policy LU-53 encourages partnerships with colleges and universities to strengthen connections with the community and adjacent neighborhoods, and support workforce development, business creation and innovation, and retention of youth and young professionals. Policy LU-54 aims to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution-owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.

The project site is located in the Mississippi River Corridor Critical Area (MRCCA). The MRCCA is designated in Minnesota state law and applies to land areas on both sides of the Mississippi River in the Minneapolis-Saint Paul-Bloomington metropolitan area along a roughly 72-mile stretch of the river between Coon Rapids and Hastings, MN. The intent of the MRCCA is to protect and preserve the natural, scenic, recreational, and transportation resources along the corridor, which is done through additional planning requirements and development standards, implemented by communities located in the MRCCA.

The MRCCA was established by Governor's Executive Order 79-19. In 2017, the Minnesota Department of Natural Resources promulgated new MN Rules Sec, 6106 in place of the original executive order. Among the new features of MN Rules 6106 is that all municipalities within the MRCCA were required to include an MRCCA-specific chapter in their 2040 comprehensive plans. Saint Paul's plan includes Policy CA-1, stating that the City guide land use and development activities consistent with the management purpose of each of the MRCCA Districts. The project site is located within the River Towns and Crossings District (CA-RTC) of the MRCCA. The CA-RTC District includes historic downtown areas and limited nodes of intense development at specific river crossings. Institutional campuses that predate designation of the Mississippi River, such as the project site, are also included in this District. Land use

management within the CA-RTC District aims to focus redevelopment in limited areas at river crossings. Priorities of the CA-RTC District include minimizing erosion, minimizing untreated stormwater runoff into the river, maintaining public access to and public views of the river, and restoring natural vegetation in riparian corridors and tree canopy. While comprehensive plan policy language has been adopted and still applies, it should be noted that MN Rules 6106 also require all municipalities to adopt zoning regulations consistent with the rules for all areas within the MRCCA. Saint Paul is in the process of formal adoption of new ordinance language consistent with MN Rules 6106, but has not yet completed the adoption. Per the Rules, Saint Paul's existing MRCCA ordinance, which refers to the area where the project is located as the RC3 River Corridor Urban Open (an overlay zoning district), must remain in effect until new MRCCA zoning is formally adopted by the City.

iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The project site is currently zoned R2 – One Family Residential (see Figure 5). This district consists primarily of low-density, one-family dwellings, civic and institutional uses, and public services and utilities that serve residents. In Saint Paul, college and university campuses located in residentially zoned areas require a Conditional Use Permit (CUP), which defines campus boundaries and regulates building heights and setback requirements, among other things. There is an existing CUP in place for the University of St Thomas campus. The CUP specifies building height limits of 75' for the western portion of the project site and 60' for the eastern.

In addition to the underlying zoning and CUP, the project site is covered by two overlay zoning districts: the SH Student Housing Neighborhood Overlay District and overlay zoning for the MRCCA. The Student Housing overlay district only applies to non-owner occupied single family and homes and duplexes, and does not apply to the proposed arena. The project is also within the RC3 River Corridor Urban Open Overlay District (MRCCA, see Figure 6). The RC3 River Corridor Urban Open Overlay District limits building heights to 40 feet. Once formally adopted, Saint Paul's new MRCCA zoning will conform MN Rules 6106, which will allow for heights of 48' and up to 65' with a conditional use permit for the project site.

iv. If any critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those housing occupants who may be insufficiently mobile) are proposed in floodplain areas and other areas identified as at risk for localized flooding, describe the risk potential considering changing precipitation and event intensity.

No critical facilities are proposed as part of the project, and the project site is not located within a FEMA 100-year floodplain area.

b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 10a above, concentrating on implications for environmental effects.

The proposed multipurpose arena is generally compatible with surrounding campus land uses on campus and the planned land use for the site. Civic and institutional use in the R2 –

One Family Residential zone includes college, university, seminary, or similar institutions of higher learning.

The main arena section of the proposed facility is designed to a structure height of 58 feet 3 inches. The portion of the arena to house basketball practice facilities is designed to a structure height of 66 feet. Prominent corners of the building are designed as raised parapets for stair or elevator overruns and/or mechanical screening at a height of 81 feet 11 inches. All measurements are as defined by the City of Saint Paul building height calculations. Parapets, stair or elevator overruns, and mechanical screening are not calculated towards the building height per the City's zoning regulations. For sloped roofs, the midpoint of the roof is used for structure height calculations.

The proposed structure heights of the arena exceed the maximum height allowed in the RC3 River Corridor Urban Open Overlay District of 40 feet. However, the more specific height requirements of the University of St. Thomas CUP, 75' feet in the western portion of the project site and 60' in the eastern, are controlling for purposes of height regulation per a long-standing City interpretation. The facility's structure height does not exceed the maximum height allowance as defined by the University of St. Thomas' Conditional Use Permit. Note that the basketball practice facilities portion of the building, which is designed to a height of 66 feet, is located within the portion of the site with a building height restriction of 75 feet.

- c. **Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 10b above and any risk potential.**

As noted above in Item 10b, no land use or zoning incompatibilities were identified.

11. Geology, Soils, and Topography/Landforms

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

According to the Geologic Atlas of Ramsey County (1992),¹³ bedrock geology of the project site consists of Decorah Shale – green, calcareous shale with thin limestone interbeds. In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Bedrock was encountered at depths of 8 feet to 12 feet below ground surface. Groundwater was encountered in penetration test borings at depths of 6 feet to 12 feet below ground surface. Groundwater was also encountered in limestone seams within the bedrock formation. Surficial geology of the project consists of stream sediment of Glacial River Warren.

No sinkholes or karst conditions were identified for the project site.

¹³ Geologic Atlas of Ramsey County, Minnesota. Minnesota Geological Survey. Available at <https://conservancy.umn.edu/handle/11299/58233>.

- b. Soils and Topography – Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability, or other soil limitations, such as steep slopes or highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections, or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 12.b.ii.**

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, there are two soil types within the site: the Urban land-Chetek complex, 3 to 15 percent slopes, which covers the majority of the project site, and the Urban land-Waukegan complex, 0 to 3 percent slopes, which covers the northeastern corner of the project site. Due to the location of the site and the classification of the soil, the soil type is not rated for an erosion hazard rating, meaning that there is not enough information to make a determination regarding soil erodibility.

In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Fill, consisting of a mixture of sandy lean clays, lean clays, clayey sands, and silty sands, was encountered at all boring locations to depths of 3 feet to 9.5 feet below ground surface. American Engineering Testing concluded that the fill material has variable strength and compressibility, are mostly slow draining and are susceptible to freeze-thaw movements. Soils documented below fill included coarse alluvial soil and till, determined to be moderate to slow draining and susceptible to freeze thaw movements.

Site grading for the proposed arena will occur, with approximately 60,000 cubic yards of excavation proposed for site grading and development. Grading activities within the site are anticipated to begin in spring 2024. Where required, slope stabilization will be provided by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control. The proposed development within the site will require compliance with the Capitol Region Watershed District's and the City of Saint Paul's erosion and sediment control standards.

12. Water Resources

- a. Describe surface water and groundwater features on or near the site below.**
- i. Surface Water – lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, shoreland classification and floodplain/floodway, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include the presence of aquatic invasive species and the water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.**

There are no surface waters located within the project site (see Figure 7). No trout streams or lakes, wildlife lakes, migratory waterfowl feeding and resting lakes, or outstanding resource value waters are located within the project site or within one mile of the project site.

The National Wetlands Inventory identifies 12 wetland and water features within 1 mile of the project site, including the Mississippi River which is located less than ¼ mile west of the project site (see Figure 7). This segment of the Mississippi River is also identified as a Minnesota Department of Natural Resources (DNR) Public Watercourse and Public Water Basin (U.S. Lock & Dam #1 Pool).

The Mississippi River is listed as impaired on the Minnesota Pollution Control Agency's (MPCA's) Part 303d Impaired Waters List (ID Number 07010206-814). This stretch of the river, from Upper St. Anthony Falls to the St. Croix River, is listed as impaired for mercury, PCBs, PFOS, aluminum, nutrients, total suspended solids, and fecal coliform. Total Maximum Daily Load (TMDL) plans have been approved for mercury in fish tissue and water column, nutrients, and total suspended solids.

The National Hydrography Dataset from the U.S. Geological Survey identifies nine flowline features within 1 mile of the project site, including the Mississippi River. The nearest NHD-mapped flowline is a stream approximately 140 feet west of the project site, in alignment with the Grotto. The Grotto is a known feature within the campus. The grotto is a linear aquatic feature that conveys stormwater run-off from the impervious surfaces within the project site.

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

According to the Minnesota Department of Natural Resources' (DNR's) Minnesota Hydrogeology Atlas,¹⁴ depth to groundwater is mapped as greater than 50 feet across the site. In April 2023, American Engineering Testing prepared a draft Report of Geotechnical Exploration for the project site. American Engineering Testing completed subsurface exploration which consisted of 12 penetration test borings throughout the project site. Groundwater was encountered in penetration test borings at depths of 6 feet to 12 feet below ground surface. Groundwater was also encountered in limestone seams within the bedrock formation.

According to the Minnesota Department of Health's (MDH's) Minnesota Well Index,¹⁵ one active irrigation well is mapped south of McCarthy Gymnasium. In March 2023, American Engineering Testing installed a temporary piezometer to measure groundwater levels. The well has not been updated on MDH's Well Index. According

¹⁴ Minnesota Department of Natural Resources. Minnesota Hydrogeology Atlas. Available at https://www.dnr.state.mn.us/waters/groundwater_section/mapping/mn-hydro-atlas.html.

¹⁵ Minnesota Department of Health. Minnesota Well Index. Available at <https://mnwellindex.web.health.state.mn.us/>.

to MDH's Source Water Protection Web Map Viewer,¹⁶ the project site is not within a wellhead protection area or drinking water supply management area.

b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects below.

i. Wastewater – For each of the following, describe the sources, quantities, and composition of all sanitary, municipal/domestic, and industrial wastewaters projected or treated at the site.

1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

Wastewater pretreatment measures to be installed at the project site include a commercial kitchen grease trap. Existing sanitary sewers to serve the project site are located along Summit Avenue, Cretin Avenue, and Grand Avenue. The proposed site design includes a new sanitary sewer connection up to the south side of Summit Avenue and connection near the southeast corner of the site to an existing sanitary sewer within the site. These convey wastewater via city sanitary sewers to the Metropolitan Council interceptor system and eventually to the Metropolitan Council Wastewater Treatment Plant. The Metropolitan Council Wastewater Treatment Plant is an advanced secondary treatment plant with ultraviolet disinfection. The plant currently treats approximately 178 million gallons per day (GPD), with a capacity of up to 314 million GPD according to the Metropolitan Council Environmental Services (MCES) Plant Inflow Summary Report for the period ending September 30, 2014. Based on the Metropolitan Council Environmental Services (MCES) Sewer Availability Charge (SAC) criteria calculator, the estimated daily flow for the Multipurpose Arena is 0.055 gallons per day (MGD). Using the Metropolitan Council's hourly peaking factor of 3.2, the estimated peak flow generated is 0.176 MGD (0.06 percent of existing capacity). Thus, the existing municipal wastewater infrastructure is capable of handling new demand generated by the development.

2) If the wastewater discharge is to a subsurface sewage treatment system (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system. If septic systems are part of the project, describe the availability of septage disposal options within the region to handle the ongoing amounts generated as a result of the project. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion.

Not applicable.

3) If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent

¹⁶ Minnesota Department of Health. Source Water Protection Web Map Viewer. Available at <https://mdh.maps.arcgis.com/apps/View/index.html?appid=8b0db73d3c95452fb45231900e977be4>.

limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects.

Not applicable.

- ii. **Stormwater – Describe changes in surface hydrology resulting from change of land cover. Describe the routes and receiving water bodies for runoff from the project site (major downstream water bodies as well as the immediate receiving waters). Discuss environmental effects from stormwater discharges on receiving waters post-construction, including how the project will affect runoff volume, discharge rate, and change in pollutants. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion. For projects requiring NPDES/SDS Construction Stormwater permit coverage, state the total number of acres that will be disturbed by the project and describe the stormwater pollution prevention plan (SWPPP), including specific best management practices to address soil erosion and sedimentation during and after project construction. Discuss permanent stormwater management plans, including methods of achieving volume reduction to restore or maintain the natural hydrology of the site using green infrastructure practices or other stormwater management practices. Identify any receiving waters that have construction-related water impairments or are classified as special as defined in the Construction Stormwater permit. Describe additional requirements for special and/or impaired waters.**

The project site currently consists of approximately 4.8 acres of impervious surfaces, including approximately 2 acres of impervious surfaces which drain via topography west towards the Grotto. The Grotto lies on the University of St. Thomas campus, west of the project site and follows a drainage channel west towards the Mississippi River based on a review of topography. A National Hydrography Dataset (NHD) stream is mapped in this area. The remaining approximately 2.8 acres of impervious surfaces drain towards the southeast to an existing storm sewer tunnel which discharges to the Mississippi River.

After construction, approximately 5.8 acres of impervious surfaces are expected within the project site. Post-construction quality of stormwater runoff from the project site will be improved by best management practices (BMPs) to meet MPCA and Capital Region Watershed District treatment requirements. Design objectives for stormwater management will also include no increase in rate of stormwater drainage toward the Grotto while maintaining or improving water quality in the stormwater run-off. Remaining acres of stormwater will drain towards the existing storm sewer tunnel.

A Stormwater Pollution Prevention Plan (SWPPP) will be developed in accordance with the National Pollutant Discharge Elimination System (NPDES) permit administered by the MPCA. The SWPPP will cover temporary measures to prevent pollution during construction (erosion and sediment control as well as controls to

minimize spills, leaks, or other discharges of pollutants) and permanent measures to prevent stormwater pollution after construction. These BMPs may include one or more of the following: silt fencing, inlet sediment filters, sediment traps, diversion ditches, grit chambers, temporary ditch checks, rock filter dikes, fiber logs, turf reinforcement mats, temporary seeding, riprap and erosion control blankets for disturbed areas, and seeding or placement of sod or other plant material for final restoration. An Erosion Control Plan checklist will be followed by the developer to meet city and state requirements, minimize drainage problems and soil erosion, and prevent sediment from entering curb and gutter systems and storm sewer inlets.

The project will comply with all city, watershed district, county, and state rules for stormwater management, and chloride use will be addressed in the Stormwater Management Plan that will be reviewed by the city for compliance.

- iii. **Water Appropriation – Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use, and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality, such as reuse of water, connections with another water source, or emergency connections.**

Construction dewatering may be required for the development of the project site. Construction activities associated with dewatering will include discharging into temporary sedimentation basins to reduce the rate of water discharged from the site, as well as discharging to temporary stormwater BMPs. Any temporary dewatering will require a DNR Temporary Water Appropriations General Permit 1997-0005 if less than 50 million gallons per year and less than one year in duration. It is anticipated that the temporary dewatering would only occur during utility installations and potential construction of building footings.

The water supply will be obtained from the municipal water supply system operated by Saint Paul Regional Water Services (SPRWS). SPRWS obtains water from the Mississippi River, which is filtered through a chain of lakes and drawn into the treatment plant from Vadnais Lake. The system also has 10 water supply wells, which obtain water from the Prairie du Chien and Jordan aquifers. These wells are typically only used for emergency backup or are run at limited volumes to help control temperature and odor from the surface water intakes. By only running the wells at

these limited times, SPRWS is reducing the potential impact to the available groundwater supplies, relying instead on the available surface water supplies.

Two eight-inch water mains will serve the arena for the domestic water use. Peak demand is undetermined at the current level of project design; however, project expectations on duration include heavy usage during events, average usage during the academic year, and light to medium usage in the summer. Water use will include water closets, sinks, showers, HVAC makeup water, and ice making which will serve toilet rooms, commercial kitchens, locker rooms, ice making equipment, and HVAC makeup water. The project site is currently part of the University of St. Thomas campus and existing infrastructure will be modified.

No wells will be used as a water source for this project. One existing well is located at the southern edge of McCarthy Gymnasium and will be removed during project construction. One temporary piezometer was installed at the project site to document groundwater levels and will be removed prior to project construction. If unidentified wells are found during construction, the MPCA and MDH must be contacted to determine the course of action, which may include sealing, relocating, or preserving by a licensed well contractor according to Minnesota Rules Chapter 4725.

iv. Surface Waters

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

No wetlands are located within the project site; therefore, no impacts are anticipated.

2) Other surface waters – Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal, and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that

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

The intent of the site design will be to allow hydrology to be maintained as it exists today to the Grotto. Measures that are planned to avoid, minimize, or mitigate environmental impacts include:

- Connecting relocated storm sewer pipes into the existing storm sewer pipe upstream of the Grotto outlet to avoid disturbing the outlet connection and the existing vegetation within the channel
- Matching existing drainage areas to maintain a consistent volume of stormwater to the Grotto. Reducing volume to the Grotto may cause the existing channel to dry up and increasing volume to the Grotto may cause erosion of the existing channel and areas downstream.
- Discharging building roof water to the Grotto in lieu of surface parking lot, since building roof water is relatively clean compared to site water which often contains salts and sediments

No other surface waters are located within the project site; therefore, no additional impacts to surface waters are anticipated.

13. Contamination/Hazardous Materials/Wastes

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

The MPCA’s What’s in My Neighborhood database was reviewed to determine if any known contaminated properties or potential environmental hazards are located within or adjacent to the site. Two sites were identified within the project site, and two sites were identified adjacent to the site (see Figure 8 and Table 7).

Table 7: What’s in My Neighborhood Sites

Site ID	Site Name	Active	Activity	Program
105494	University of Saint Thomas	Yes	Petroleum Remediation, Leak Site, Underground Tanks	Investigation and Cleanup
145996	UST South Campus Facilities Bldg	No	Construction Stormwater	Stormwater

Site ID	Site Name	Active	Activity	Program
251021	University of St. Thomas Schoenecker Center	Yes	Construction Stormwater	Stormwater
143128	Soccer/Softball Field Improvements	No	Construction Stormwater	Stormwater

b. Project Related Generation/Storage of Solid Wastes – Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.

According to the Ramsey County Solid Waste Management Master Plan 2018-2038, Ramsey County will ensure compliance with applicable laws, rules, and ordinances related to the management of solid and hazardous waste as required by Minnesota Statutes, Section 473.811.

Waste Generated During Construction

Demolition debris and earth materials will be generated during demolition of the existing facilities. Demolition debris is inert material such as concrete, brick, bituminous, and rock. The solid wastes generated during demolition will be recycled or disposed of at a state-permitted landfill. The project will target a 50 percent to 75 percent diversion rate for construction-produced waste as part of the LEED approach.

Construction of the proposed development will generate construction-related waste materials such as wood, packaging, excess materials, and other wastes, which will either be recycled or disposed of in the proper facilities in accordance with state regulations and guidelines.

According to the University of St. Thomas Conditional Use Permit, a demolition survey of each building to be removed must be completed prior to demolition. The survey will identify asbestos-containing materials for the structures, if present. If asbestos-containing materials are present, they will be removed in accordance with MPCA and MDH regulations.

Waste Generated During Operation

Operation of the multipurpose arena will generate solid wastes such as food waste, beverage containers, packaging, and paper. In total, it is estimated that the proposed development will generate approximately 2,072 tons of solid waste per year. A source recycling/separation plan will be implemented for additional waste and waste that cannot be recycled will be managed in accordance with state regulations and guidelines. Waste sorting at the University of St. Thomas currently includes a co-mingled recycling program and a composting program for food waste and other compostable wastes.

c. Project Related Use/Storage of Hazardous Materials – Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location, and size of any new above or below ground tanks to store petroleum or other materials. Indicate the number, location, size, and age of existing tanks on the property that the project will use. Discuss potential environmental effects from accidental spills or releases of hazardous materials. Identify

measures to avoid, minimize, or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

No existing above ground storage tanks have been identified within the project site. One approximately 20,000-gallon underground fuel storage tank is located in the northeast corner of the project site. The underground fuel storage tank is located in the northwest corner of the Service Center building and will be removed prior to demolition of the building. According to the What's in My Neighborhood database, the tank was installed in 2012. The tank will not be replaced after construction is complete.

The project may install a diesel generator to provide backup power to the arena as well as up to four additional future diesel generators to feed the University of St. Thomas' MicroGrid. These generators would have diesel storage tanks at each generator or utilize one fuel storage tank for fuel supply. The project proposer will obtain the appropriate permits from the MPCA.

Any hazardous waste materials used or stored during construction and/or operation of the project will be disposed of in the manner specified by local or state regulation or by the manufacturer. A spill prevention plan will be developed, and proper spill prevention controls will be in place for any vehicle refueling or maintenance that occurs on site during construction.

- d. Project Related Generation/Storage of Hazardous Wastes – Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous wastes including source reduction and recycling.**

Removal of the existing structures within the site is not expected to generate new hazardous waste. Toxic or hazardous waste to be stored within the site during construction will include fuel and oil necessary to operate heavy construction equipment and during operations may include commercial cleaning supplies. Regulated material and/or waste generated or stored during construction and operations will be managed in accordance with state and local requirements.

14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

- a. Describe fish and wildlife resources as well as habitats and vegetation on or near the site.**

The existing site is primarily impervious surfaces with minimal landscaping. There are no above ground streams, rivers, lakes or ponds located within the project site; therefore, the site provides no fish habitat. The site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation. However, wildlife that can be found within the project site may include songbirds and small mammals that have adapted to an urban environment.

Fish and wildlife habitat within the vicinity of the project site includes the Mississippi River, Mississippi Gorge Regional Park, and Shadow Falls Park, all located within ¼ mile of the project site to the west and northwest.

Based on information from the U.S. Fish and Wildlife Service, the project site is located within a high potential zone of the rusty patched bumble bee; however, the disturbed nature of the site does not provide suitable habitat.

The project site is not located within any regionally significant ecological areas (RSEA), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, or native plant communities. However, as described under Item 14b, one RSEA, two MBS Sites of Biodiversity Significance, and eight native plant communities are located within one mile of the project site.

- b. Describe rare features such as state-listed (endangered, threatened, or special concern) species, native plant communities, Minnesota Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-1074) which the data were obtained and attach the Natural Heritage Review letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe results.**

State-Listed Threatened and Endangered Species

A review of the DNR's Natural Heritage Inventory System (NHIS) was conducted per license agreement LA-1074 for the project site and the area within approximately one mile of the project site. The database includes known occurrences of any state endangered, threatened, or special concern species. The review identified 20 records of 7 species that may be found near this area (see Table 8).

Table 8: State-Listed Threatened and Endangered Species

Species	Group	Status	Location	Habitat
Handsome Sedge (<i>Carex 26ormosa</i>)	Vascular Plant	Endangered	One record is located within the project site.	Preferred habitat within Ramsey County includes forested slopes along the Mississippi River.
Higgins Eye (<i>Lampsilis higginsii</i>)	Mussel	Federally and State Endangered	One record is located within one mile of the project site.	Preferred habitat is stable substrates of the Mississippi River and the lower portion of some large tributaries.
Kentucky Coffee Table (<i>Gymnocladus dioica</i>)	Vascular Plant	Special Concern	One record is located within the project site.	Preferred habitat includes mesic hardwood forest on terraces of the Mississippi River.
Round Pigtoe (<i>Pleurobema sintoxia</i>)	Mussel	Special Concern	One record is located within one mile of the project site.	Preferred habitat includes fast current areas dominated by coarse sand and gravel substrate in medium to large rivers.
Rusty patched Bumble Bee (<i>Bombus affinis</i>)	Insect	Federally Endangered	Four records are located within one mile of the project site.	Preferred habitat includes semi-natural upland grassland, shrubland, woodlands, and forests. The entire project site is within a High Potential Zone.
Swamp White Oak (<i>Quercus bicolor</i>)	Vascular Plant	Special Concern	One record is located within the project site and two records are located within one mile of the project site.	Preferred habitat includes floodplain forest along the Mississippi River.
Wartyback (<i>Quadrula nodulata</i>)	Mussel	Threatened	Nine records are located within one mile of the project site.	Preferred habitat includes large rivers with fine or coarse substrates in areas with slow to moderate current.

Other Sensitive Ecological Resources

The Mississippi River is located within ¼ mile of the project site and is identified as an RSEA. RSEAs are given a score of 1, 2, or 3 based on how well continuous natural areas meet standards for size, shape, connectivity, adjacent land use, and species diversity, with 3 being the highest possible score. The section of the Mississippi River near the project site has a score of 1. Areas ranked as 1 tend to be small and have less diversity in vegetative cover. They also typically have adjacent land cover types or uses that could adversely affect the RSEA.

Two MBS Sites of Biodiversity Significance, St. Paul Bluffs W and West Bank Mississippi River, are located approximately 0.15 mile and 0.30 mile west of the project site. Each MBS Site is ranked based on rare species populations, native plant communities, and landscape context. Both St. Paul Bluffs W and West Bank Mississippi River have been assigned a moderate rank. Moderate sites contain occurrences of rare species, moderately disturbed native plant communities, and/or landscapes that have strong potential for recover of native plant communities.

Eight native plant communities were identified within one mile of the project site, and approximately align with the St. Paul Bluffs W and West Bank Mississippi River MBS Sites of Biodiversity Significance. The plant communities include one Mesic Prairie (Southern), one Red Oak-White Oak-(Sugar Maple) Forest, three Red Oak-Sugar Maple-Basswood-(Bitternut Hickory) Forests, and three Silver Maple-(Virginia Creeper) Floodplain Forests.

As noted above in Item 14a, these sites and native plant communities are not located within the project site.

- c. Discuss how the identified fish, wildlife, plant communities, rare features, and ecosystems may be affected by the project, including how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.**

Wildlife Habitat and Threatened and Endangered Species

No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat. No impacts to the state-listed and federally-listed mussels species are expected, as there is no suitable habitat within the project site and no impacts to the nearby Mississippi River are expected. The DNR is completing a Natural Heritage Review for the proposed project and results are pending (see correspondence in Appendix B).

Invasive Species

Invasive species are plants and animals that are not native to an area and are capable of causing harm. Certain measures can be taken to limit the likelihood of introducing invasive species, such as securing local materials to avoid the long-range movement of goods or washing vehicles prior to accessing the project site. Additionally, as landscape designs are finalized, they will consider including native, non-invasive plants.

d. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.

Invasive species will be controlled on site during construction, and proposed landscaping will not include any DNR-identified invasive species. Additionally, best management practices will be followed when relocating construction equipment from other sites.

University of St. Thomas is considering ways to design landscaping plans to add shade trees and increase the landscaped area with a blend of biodiverse, native, drought tolerant plant species that could provide pollinator habitat.

No adverse impacts are expected to state-listed and federally-listed species.

15. Historic Properties

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include 1) historic designations; 2) known artifact areas; and 3) architectural features. Attach letter received from the State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

A search of the Minnesota State Historic Preservation Office’s (SHPO) Statewide Inventory was requested to identify known historic properties and archaeological sites in the vicinity of the project. The database search identified no archaeological records in the project site. Within Township 28N, Range 23W, Section 5, the database search identified 221 records. Of the 221 records, 35 properties are listed in the National Register of Historic Places (NRHP) and 5 properties that are considered eligible for the NRHP. “Considered eligible” means that a federal agency has recommended that the property is eligible for listing in the NRHP and SHPO has accepted the recommendation for the purposes of the environmental review process. However, these properties need to be further assessed before they are officially listed in the NRHP. The remaining 181 records identified in the database search have no designation and may not have been evaluated; therefore, no assumption to their eligibility can be made. Three of the properties identified via the database search are located within the project site, and an additional 14 properties are located within 500 feet of the project site (see Table 9 and Figure 9). The three properties located within the project site are listed as considered eligible; however, these buildings are not considered locally significant for historic preservation. Given the lack of a federal nexus or formal listing on the NRHP and the lack of local designation no further evaluation or assessment is required. The City of Saint Paul Heritage Preservation staff has also reviewed the project and project site and has determined no further evaluation is needed for demolition of the existing buildings within the project site.

Table 9: Historic Properties within 500 feet of the Project Site

Property Name	Location Relative to Project	Status
Almendinger Apartments	Within 500 feet of Project Site	No designation
Apartment (2171 Grand Ave. W)	Within 500 feet of Project Site	No designation
Binz Refectory – St. Paul Seminary (University of St. Thomas)	Within 500 feet of Project Site	No designation

Property Name	Location Relative to Project	Status
Brady Education Center – St. Paul Seminary (University of St. Thomas)	Within 500 feet of Project Site	No designation
Cretin Court Apartments	Within 500 feet of Project Site	No designation
Grace Residence (University of St. Thomas)	Within 500 feet of Project Site	Considered eligible
Grand Student Apartments	Within 500 feet of Project Site	No designation
Grotto and Woodland Walk – St. Paul Seminary	Within 500 feet of Project Site	No designation
McCarthy Recreation Building – St. Paul Seminary (University of St. Thomas)	Project Site	No designation
Mills, H.S., House	Within 500 feet of Project Site	Listed in the NRHP
Nilson Apartments	Within 500 feet of Project Site	No designation
O’Shaughnessy Hall – University of St. Thomas	Within 500 feet of Project Site	No designation
St. Mary’s Chapel (St. Paul Seminary)	Within 500 feet of Project Site	Listed in the NRHP
St. Paul Seminary Gymnasium/Heating Plant (Service Center Building) (University of St. Thomas)	Project Site	Considered eligible
St. Paul Seminary South Dormitory/Cretin Hall (University of St. Thomas)	Project Site	Considered eligible
Tierney, S., House	Within 500 feet of Project Site	Listed in the NRHP

The northern portion of the project site is located within the Summit Avenue West Heritage Preservation District. In February 2022 the Saint Paul Heritage Preservation Commission determined that a review of the project is required, focused on the portion of the building that lies within the Summit Avenue West Heritage Preservation District. The review will be complete when detailed project designs are provided to the Heritage Preservation Commission.

It is not anticipated that unknown archaeological sites will be uncovered during the construction of this project as the site has been previously disturbed. However, if cultural materials are encountered during construction, unanticipated discovery protocols will be followed.

16. Visual

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

The project site includes existing institutional land, and no unique designated scenic views or vistas are located within the site. The City of Saint Paul *2040 Comprehensive Plan* identifies Public River Corridor Views (PRCV) within the Mississippi River Corridor Critical Area (MRCCA) on public property, including parks and trails, historic properties, and bridge overlooks. Views towards

bluffs from the opposite side of the shore are also noted. View #3 – Shadow Falls Overlook is located within ¼ mile of the project site; however, the view direction is towards the Mississippi River and away from the project site. Considering the set back from Mississippi Gorge Regional Park, views of the project site from the western bank of the Mississippi River will be minimal.

Policy CA-11 as outlined in the MRCCA plan is intended to protect and minimize impacts to PRCV from public development activities. According to the PRCV map, the project site is not located within the view range of any identified view locations. Therefore, the project will not have an impact on identified significant public views, which is consistent with Policy CA-11.

Generally, views from the surrounding area would be similar to those experienced currently, as current and future land use is within an institutional facility and there are buildings of similar massing already in the area. Changes in views of the campus would be most noticeable from portions of Goodrich Avenue, and from the Grand Avenue right-of way. The proposed project will conform with the City's regulations for building height, building form, landscape screening, and lighting. Adverse visual effects are not anticipated.

17. Air

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

Minimal stationary source air emissions are anticipated from natural gas use and #2 fuel oil for the boiler system. See Table 12: Proposed Operational Emissions for more information.

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

Motor vehicles emit a variety of air pollutants including carbon monoxide (CO), hydrocarbons, nitrogen oxides, and particulates. The primary pollutant of concern is CO, which is a byproduct of the combustion process of motor vehicles. CO concentrations are highest where vehicles idle for extended periods of time. For this reason, CO concentrations are generally highest in the vicinity of signalized intersections where vehicles are delayed and emitting CO. Generally, concentrations approaching state air quality standards are found within about 100 feet of a roadway source. Further from the road, the CO in the air is dispersed by the wind such that concentrations rapidly decrease.

The Minnesota Department of Transportation (MnDOT) has developed a screening method designed to identify intersections that will not cause a carbon monoxide (CO) impact above state standards. MnDOT has demonstrated that even in the 10 highest traffic volume intersections in the Twin Cities do not experience CO impacts. Therefore, intersections with traffic volumes lower than these 10 highest intersections will not cause a CO impact above

state standards. MnDOT's screening method demonstrates that intersections with total daily approaching traffic volumes below 82,300 vehicles per day will not have the potential for causing CO air pollution problems. The 10 highest traffic volumes in the Twin Cities include: Cedar Avenue at County Road 42, Hwy 252 at 66th Avenue, Hwy 252 at 85th Avenue, County Road 42 at Nicollet Avenue, Hwy 252 at Brookdale Drive, Hwy 7 at County Road 101, Hwy 7 at Williston Road, University Avenue at Lexington Avenue, University Avenue at Snelling Avenue, and Hennepin Avenue at Lake Street. None of the intersections in the vicinity of the project site exceed the criteria that would lead to a violation of the air quality standards.

- c. **Dust and Odors – Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 17a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.**

The project may generate temporary fugitive dust emissions during construction. These emissions would be controlled by sweeping, watering, or sprinkling, as appropriate or as prevailing weather and soil conditions dictate. Dust emissions are not anticipated during operations as all surfaces will either be impervious or vegetated.

The construction and operation of the project are not expected to generate objectionable odors.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

- a. **GHG Quantification – For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.**

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs) play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back towards space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical

land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth’s climate, known as global climate change or global warming.¹⁷

This section includes an estimated quantification of the following GHG emissions associated with the proposed project:

- Carbon Dioxide (CO₂)
- Nitrous Oxide (N₂O)
- Methane (CH₄)

The projected GHG emissions are provided on an average annual basis using the CO₂ equivalent (CO₂e) and include the proposer’s best estimate of average annual emissions over the proposed life/design service life of the project. Emissions were estimated using the US Environmental Protection Agency’s Simplified GHG Emissions Calculator (August 2022)¹⁸ and are summarized by project phase (i.e., construction and operations) and source type (e.g., combustion from mobile equipment, off-site electricity (see Appendix C for background analysis). Estimated existing emissions are summarized in Table 10 and estimated proposed emissions are summarized in Table 11 and Table 12 .

Construction emissions are based on length of construction, size of site, and are from mobile equipment including passenger cars, light-duty trucks, medium and heavy-duty trucks, and construction equipment (both gasoline and diesel).

Emissions from cooling and refrigeration systems are not accounted for in this operational emissions analysis as GHGs from refrigerants are approximately less than 5 percent of the total GHG emissions of a building.¹⁹ The project will incorporate an ammonia (NH₃)-based refrigerant plant for the ice rinks; however, annual usage will be limited for maintenance needs only and therefore not included in the GHG analysis. Ammonia is considered an acceptable non-ozone depleting alternative for ice rinks compared to other hydrochlorofluorocarbons substances under EPA’s Significant New Alternatives Policy program.²⁰ There will be safety plans in place to handle the ammonia use appropriately. The project will include the use of Zambonis to service the ice rink and a forklift to service the facility and both are planned to be electric and not included in the GHG analysis. The project does not plan to purchase gases during operation or land use conversions.

Table 10: Existing Operational Emissions

Scope	Emission Type	Emission Sub-Type	CO ₂ e Emissions (tons/year)
Scope 1	Combustion	Stationary equipment	161
Scope 2	Off-site electricity	Grid-based	523

¹⁷ Summarized from U.S. EPA, Overview of Greenhouse Gases: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>

¹⁸ Source: <https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator>

¹⁹ Source: https://practicegreenhealth.org/sites/default/files/2019-06/PracticeGreenhealth_GHG_Toolkit_0.pdf

²⁰ Source: https://www.epa.gov/sites/default/files/2015-07/documents/ice_rinks_and_the_phaseout_of_hcfc-22.pdf

Scope	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons/year)
Scope 3	Off-site waste management ²¹	Area	294
Total			978

Table 11: Construction Emissions

Scope ²²	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons)
Scope 1	Combustion	Mobile equipment	1,239
Total			1,239

Table 12: Proposed Operational Emissions

Scope	Emission Type	Emission Sub-Type	CO _{2e} Emissions (tons/year)
Scope 1	Combustion	Stationary equipment	914
Scope 2	Off-site electricity	Grid-based	1,539
Scope 3	Off-site waste management	Area	531
Total			2,984

b. GHG Assessment

i. Describe any mitigation considered to reduce the project’s GHG emissions.

The following design strategies and other sustainability measures are being considered for the proposed development to reduce emissions:

- Use energy efficient lighting.
- Occupancy/vacancy and daylight sensor controls on lighting.
- Energy efficient building envelope, including continuous insulation for all roof and wall surfaces and high-performance aluminum glazing systems.
- The facility will be designed to meet LEED Silver rating.
- Install low-flow indoor plumbing fixtures.
- Use high-efficiency boilers for domestic hot water.
- Lower carbon structure and materials selection through incorporation of products with recycled content and/or sustainable manufacturing methods.

²¹ Based on calculations from CalRecycle’s website titled "Estimated Solid Waste Generation Rates," available at <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>.

²² Emissions are categorized as either direct or indirect. Scope 1 emissions are direct emissions that are released directly from properties owned or under the control of the project proposer. This includes, for example, the use of mobile equipment during construction. Scope 2 and 3 emissions are indirect emissions. Scope 2 emissions are associated with the offsite generation of purchased electricity and/or steam. Scope 3 emissions are from the offsite provision of waste management services, including land disposal (landfilling), recycling, and solid waste composting.

- Install on-site photovoltaics.
 - Provide electrical vehicle infrastructure.
 - Use low global warming potential refrigerants for the building cooling system.
 - Install air curtains at all loading dock doors to reduce infiltration.
- ii. **Describe and quantify reductions from selected mitigation, if proposed to reduce the project’s GHG emissions. Explain why the selected mitigation was preferred.**

The proposed mitigation listed in Item 18.b.i includes best management practices for new construction and reducing GHG emissions where practicable during operations.

- iii. **Quantify the proposed project’s predicted net lifetime GHG emissions (total tons per number of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.**

The Next Generation Energy Act requires the state to reduce greenhouse gas emissions in the state by 80 percent between 2005 and 2050, while supporting clean energy, energy efficiency, and supplementing other renewable energy standards in Minnesota. The MPCA’s biennial GHG emissions reduction act report from 2023²³ identifies strategies for reducing emissions in the three economic sectors with the highest emissions – transportation, electricity generation, and agriculture, forestry, and land use.

The expected lifespan of the project is 50 years, which equates to an estimated 149,200 CO₂e metric tons over the lifetime of the building (including both construction and operations phases). The proposer is committed to implementing the sustainability measures listed in Item 18.b.i. to reduce operational emissions to the extent practicable. The proposed project will be built in compliance with state regulations (State of Minnesota Statutes Chapter 326.89) and City of Saint Paul building code (Saint Paul Legislative Code Chapter 326).

The University of St. Thomas has had a 53 percent reduction in carbon emissions since 2008, and 20 percent of building square footage on campus are LEED-certified. Additionally, the University has committed to a goal of carbon neutrality by 2035.

19.Noise

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

Existing Noise

²³ Available at <https://www.pca.state.mn.us/air-water-land-climate/climate-change-initiatives>

The project site is located on at an institution (University of St. Thomas) in an urban area, and existing noise at the site is largely from the surrounding roadways. Nearby sensitive receptors include residences approximately 200 feet east, 300 feet south, and 500 feet north of the project site.

Construction Noise

Typical construction noise will be temporarily generated by construction activities. The Saint Paul Code of Ordinances regulates both the hours of operation for construction equipment and allowable noise levels. Construction of the project will adhere to requirements identified in Saint Paul Code of Ordinance Chapter 293 Section 07, which limits construction noise in residentially zoned districts to 65 decibels A (dBA) between the hours of 7:00 am and 10:00 pm, and 55 dBA between the hours of 10:00 pm and 7:00 am.

Operational Noise

The City of Saint Paul and Minnesota Pollution Control Agency regulate noise. The proposed project will potentially contribute to the existing campus noise. Further noise evaluation will be completed as design progresses and best practices to reduce noise spill will be considered including placement of speakers and other sound systems within the arena and the design of the building wall systems. The facility will be required to comply with local and state noise regulations. If the facility exceeds noise regulations, the project proposer will work with the city to identify potential mitigation options. As with any other entity, it is also possible for the project proposer to seek noise-level variances for special events, which would be reviewed by the Saint Paul City Council through existing procedures.

20. Transportation

- a. Describe traffic-related aspects of project construction and operation. Include 1) existing and proposed additional parking spaces; 2) estimated total average daily traffic generated; 3) estimated maximum peak hour traffic generated and time of occurrence; 4) source of trip generation rates used in the estimates; and 5) availability of transit and/or other alternative transportation modes.**

Parking

In May 2023, SRF prepared a Transportation Study for the project site (see Appendix D). According to information provided by the study, several surface parking lots (Lots N, O, P, V, X, and Y) are expected to be removed during project construction. Lot O is expected to be reconstructed during project implementation to provide 38 surface parking spaces, resulting in a total net loss of 264 surface parking spaces. The proposed development requires creation of a Transportation Demand Management Plan under Saint Paul Zoning Code Sec. 63.122.

Traffic Generation

An existing pre-event and post-event peak hour trip generation was estimated for a maximum capacity event at the project site based on assumptions that were discussed and reviewed by UST and City of St. Paul throughout the study process. Total pre-event peak hour generates approximately 1,498 trips and post-event peak generates approximately 1,581 trips.

Pedestrians and Bicycles

The project site is currently served with sidewalks and all signalized intersections surrounding the University of St. Thomas campus are programmed with leading pedestrian interval timing, which helps improve pedestrian safety. A sidewalk gap exists on the north side of Goodrich Avenue.

An off-street bicycle trail is located along Mississippi River Boulevard, west of the project site. On-street bicycle lanes are located along Summit Avenue and Cleveland Avenue to the north and east of the project site.

Transit Service

Several Metro Transit stops are located on or near the University of St. Thomas campus. Metro Transit Bus Routes 21, 63, and 87 serve the vicinity of the project site.

Routes 21 provides service between the Uptown Transit Station and downtown Saint Paul, and Route 63 provides service between western Saint Paul and downtown Saint Paul. Both Routes 21 and 63 operate seven days a week and are part of Metro Transit's High Frequency Network, with approximately 15-minute headways during peak hours on the weekdays and Saturdays. Service during nights and on Sundays provides 15 to 30-minute headways. Route 87 is a local bus route between Saint Paul and Roseville. It operates seven days a week with 30-minute headways during peak hours on the weekdays and 1-hour headways during nights and on the weekends.

Additionally, the University of St. Thomas provides a shuttle bus between the Saint Paul campus and the Minneapolis campus, is free for staff and students, and runs every 20-30 minutes.

- b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. *If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: <http://www.dot.state.mn.us/accessmanagement/resources.html>) or a similar local guidance.***

In May 2023, SRF prepared a Transportation Study for the project site. A parking demand analysis was performed during peak non-event conditions at the University of St. Thomas and determined that on average, 173 vehicles will be displaced as a result of the project. However, on average, 259 parking spaces are available during peak non-event conditions on campus, a surplus of 86 parking spaces during those times given current (pre-project) parking availability.

An event parking demand analysis was also completed and estimated the maximum demand for basketball games to be 1,420 parking spaces, maximum demand for hockey games to be 1,050 parking spaces, and typical event demand to be 775 parking spaces. Based on campus and adjacent on-street parking restrictions, maximum basketball events are expected to have a deficit of approximately 330 to 740 vehicles which will likely use public parking in the neighborhood. Maximum basketball events may occur one to two times per year. Maximum

hockey events are expected to occur two to four times per year and parking demand is expected to generally be accommodated on campus. Typical events are expected to have a parking deficit of approximately 100 vehicles for weeknight events and parking surplus of approximately 240 to 320 vehicles for weekend events. See Table 13 from the SRF Transportation Study included in Appendix D to this EAW that provides further information on assumptions used to derive expected parking demand.

Table 13: Event parking Demand Analysis

	Total Number of Games ⁽¹⁾	Estimated Frequency	Available Supply	Demand ⁽²⁾	Deficit/Surplus
Thursday/Weeknight Night Event					
Max Basketball (5,500)	4 to 7 BBall	0 - 1	678	1420	-742
Typical (3,000)	No Hockey	6		773	-95
Friday Night Event					
Max Basketball (5,500)	1 BBall 9 Hockey	0	1016	1420	-404
Max Hockey (4,000)		2		1053	-37
Typical (3,000)		8		773	243
Saturday Night Event					
Max Basketball (5,500)	6 BBall 9 Hockey	0 - 1	1090 ⁽³⁾	1420	-330
Max Hockey (4,000)		2		1053	37
Typical (3,000)		13		773	317

(1) Based on expected men's hockey and basketball schedules.

(2) UST players/coaches and event staff are expected to park in the reconstructed lot O or other commuter and faculty/staff lots.

(3) Note nearby city permit parking restrictions are generally not in effect on Saturday.

An intersection capacity analysis was conducted to determine how traffic is expected to operate during pre-event peak hour and post-event peak hour times. Capacity analysis results identify a level of service (LOS) which indicates how well an intersection is operating. Intersections are graded from LOS A (indicates best traffic operation) through LOS F (indicates an intersection where demand exceeds capacity) and are based on average delay per vehicle. Overall intersection LOS A through LOS D is generally considered acceptable in the Twin Cities Metropolitan Area, although longer delays for short periods of time and/or for specific movements are often considered acceptable as well.

Based on the intersection capacity analysis, multiple areas were identified for further consideration. Mitigation strategies for traffic congestion and event management are further discussed in Section 20.c. below. Existing conditions of intersection capacity, 2025 maximum capacity pre-event and post-event intersection capacity, and 2025 maximum capacity pre- and post-event capacity with mitigation strategies are provided in Table 13 below.

Table 14: LOS Summary

Intersection	Existing Conditions				2025 Build Maximum Capacity Event Conditions			
	AM Peak Hour		PM Peak Hour		Pre-Event		Post-Event	
	LOS	Delay s/veh (typ)	LOS	Delay s/veh (typ)	No Mitigation	Mitigation	No Mitigation	Mitigation
Cretin Ave S / Marshall Ave	C	26	D	53	C	D	C	C
Cretin Ave S / Selby Ave	A/A	10	A/B	11	A/E	B/F	A/C	A/B
Cretin Ave S / Mississippi River Blvd	A/A	5	A/A	6	A/B	A/B	A/A	A/A
Cretin Ave S / Summit Ave	A	8	B	14	D	D	D	C
Cretin Ave S / Grand Ave	B	10	B	14	E	D	F	D
Cretin Ave S / Goodrich Ave	A/A	9	A/C	16	F/F	C/F	A/C	A/C
Cleveland Ave S / Selby Ave	A/A	6	A/B	12	A/A	A/A	A/A	A/A
Cleveland Ave S / Summit Ave	B	13	B	19	B	B	B	B
Cleveland Ave S / Grand Ave	B	15	B	15	B	B	B	B
Mississippi River Blvd / Summit Ave	A/A	4	A/A	5	A/A	A/A	A/A	A/A
Mississippi River Blvd / Goodrich Ave	A	4	A	4	A	A	A	A

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

Traffic Level of Service

During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 15 to 30 minutes. These approaches mostly consist of low-volume residential traffic. Communication should be made to area residents and other sources of commuter traffic, so they are aware of potential event traffic and the most efficient route to get to/from their destination. In urban areas, it is common for intersections to operate at LOS E or LOS F for short periods of time, particularly when balancing other transportation modal priorities.

Parking

The transportation study identified several mitigation strategies to address maximum event parking deficits and reduce on-street public parking in nearby neighborhoods during events.

The University of St. Thomas could implement time-of-day restrictions on campus parking lots during event days to clear out campus lots. This strategy could provide between 120 and 165 additional parking spaces on weekends and up to 390 additional parking spaces on weeknights. This strategy alone would not provide off-street parking sufficient to meet anticipated demand for peak-attendance basketball games or the largest potential ancillary events, such as graduation ceremonies. However, several additional mitigation strategies and improvements were identified that could help reduce this deficit. An additional mitigation strategy would be to require pre-paid event parking tickets for all visitor lots. Assignment of parking ahead of event days could assure event patrons know their destination prior to the event. Additionally, the University of St. Thomas could schedule higher attendance games on weekends to limit higher attendance games on weeknights when less on-campus parking is available, provide transit incentives with the purchase of an event ticket, utilize restricted commuter and faculty/staff parking lots, form a partnership with a rideshare company, provide overflow parking on the south athletic fields, and communicate bicycle parking locations to event patrons.

Several potential event management recommendations to reduce pedestrian/vehicular conflicts to improve pedestrian safety and reduce event congestion are outlined in the transportation study (see Appendix D). Designated pedestrian routes provided through the use of barricades, cones, and wayfinding signage is expected to improve pedestrian safety and traffic flow efficiencies during pre- and post-event peak hours. Traffic cones to allow additional storage of vehicles entering the Anderson Parking Facility along Cretin Avenue could alleviate traffic operations. Wayfinding signage within Anderson Parking Facility can direct pedestrians towards the western access and reduce crossing conflicts. Additionally, signal timing modifications and traffic control officer usage could reduce traffic congestion during pre-event and post-event conditions. As the project proceeds, further refinement of potential mitigation strategies is expected.

These potential mitigation strategies will be finalized and reviewed with the City of St. Paul through the Zoning Code-required Transportation Demand Management Plan that is a site plan review submittal requirement.

21. Cumulative Potential Effects

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

Cumulative potential effects are defined as “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.”²⁴ The geographic areas considered for cumulative potential effects are those near the project site (within approximately one-half mile), and the timeframe considered includes projects that would be constructed in the reasonably foreseeable future.

²⁴ Minnesota Rules, part 4410.0200, subpart 11a

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

According to the City of Saint Paul Downtown Projects Map interactive viewer,²⁵ there is one reasonably foreseeable project within approximately one-half mile of the project site. Summit Avenue from Mississippi River Boulevard to Snelling Avenue is scheduled to be resurfaced in 2023. The University of St. Thomas does not have any board approved plans for new building construction at the Saint Paul campus. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any future building projects to contribute to the understanding of cumulative potential effects.

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

The identified reasonably foreseeable future projects may result in impacts to transportation, utilities, or other resources. However, potential impacts of these projects will be addressed as required by regulatory permitting and approval processes, minimizing the potential for cumulative effects.

22. Other Potential Environmental Effects

If the project may cause any additional environmental effects not addressed by Items 1 to 21, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

All anticipated potentially adverse environmental effects are addressed in the preceding EAW items.

²⁵ Available at

https://experience.arcgis.com/experience/99bea6f90c4a409a8a64fff81dee30e7/page/Overview/?data_id=dataSource_5-17cc347089c-layer-15%3A238

RGU Certification

The Environmental Quality Board will only accept **SIGNED** Environmental Assessment Worksheets for public notice in the EQB Monitor.

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The EAW describes the complete project; there are no other projects, stages, or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively,
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature Nicolle Goodman
Nicolle Goodman (Jun 20, 2023 12:45 CDT)

Date Jun 20, 2023

Title Director, Department of Planning and Economic Development

Figures

Figure 1: County Map

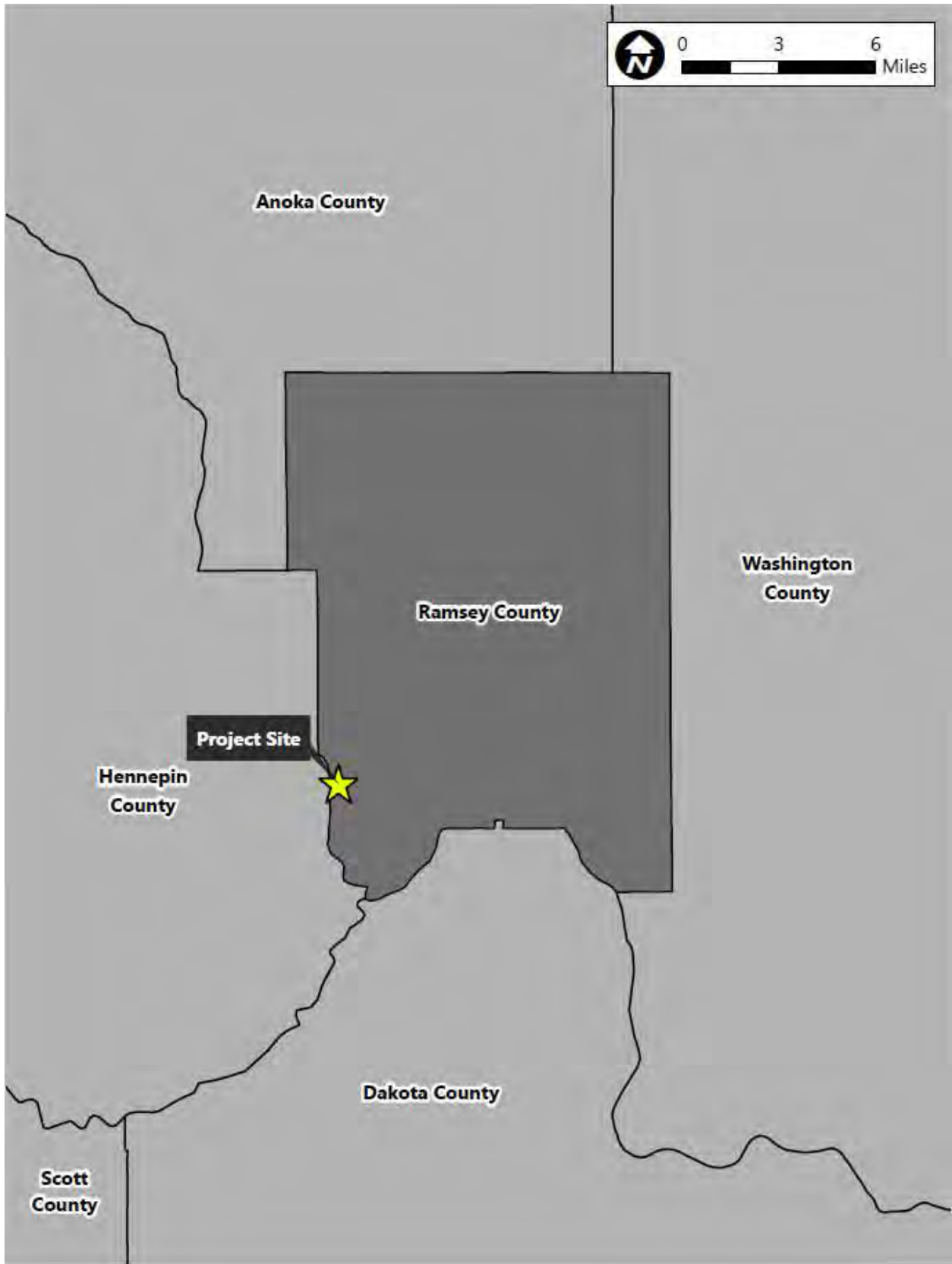


Figure 2: USGS Map

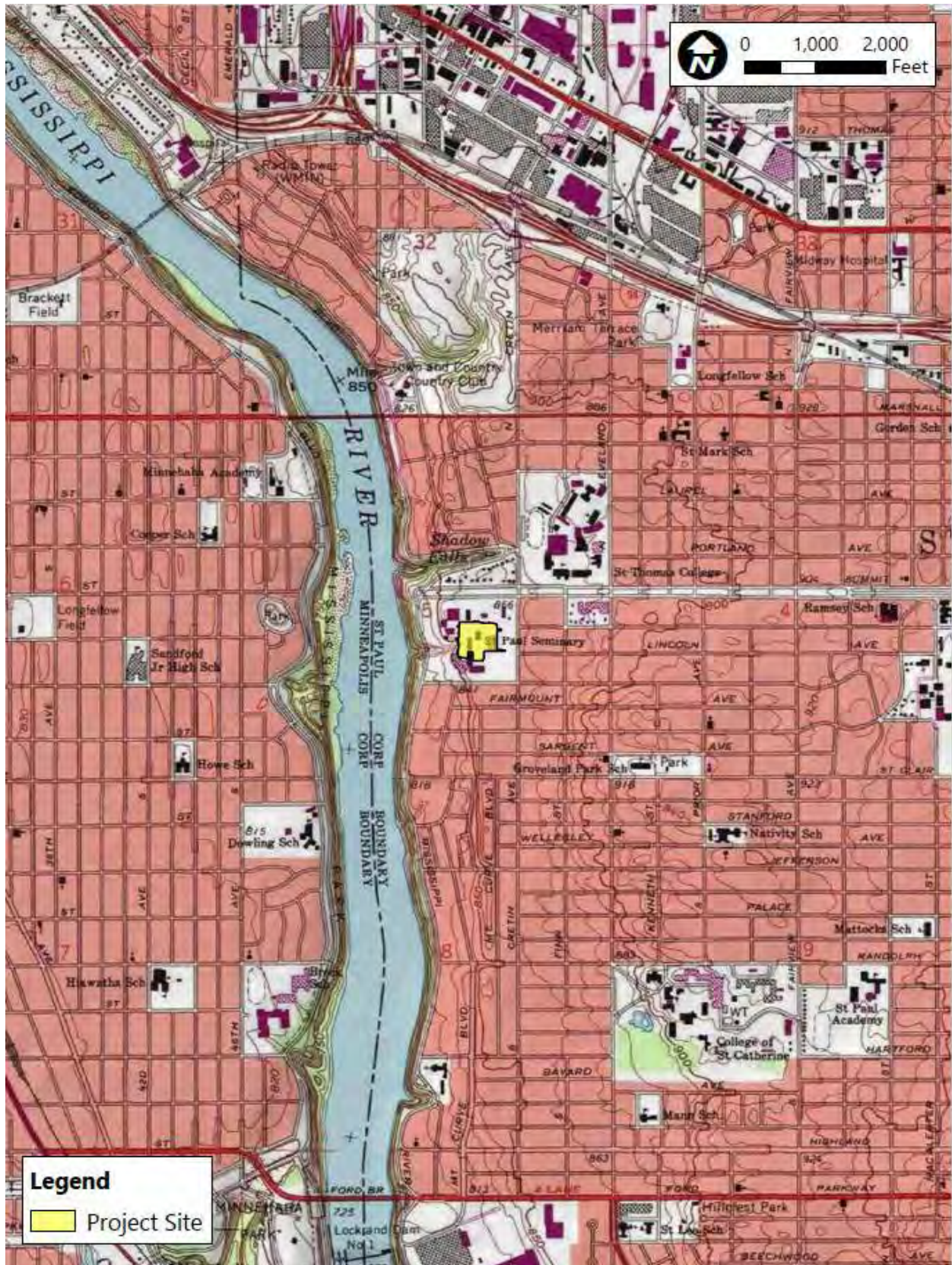


Figure 3: Existing Conditions

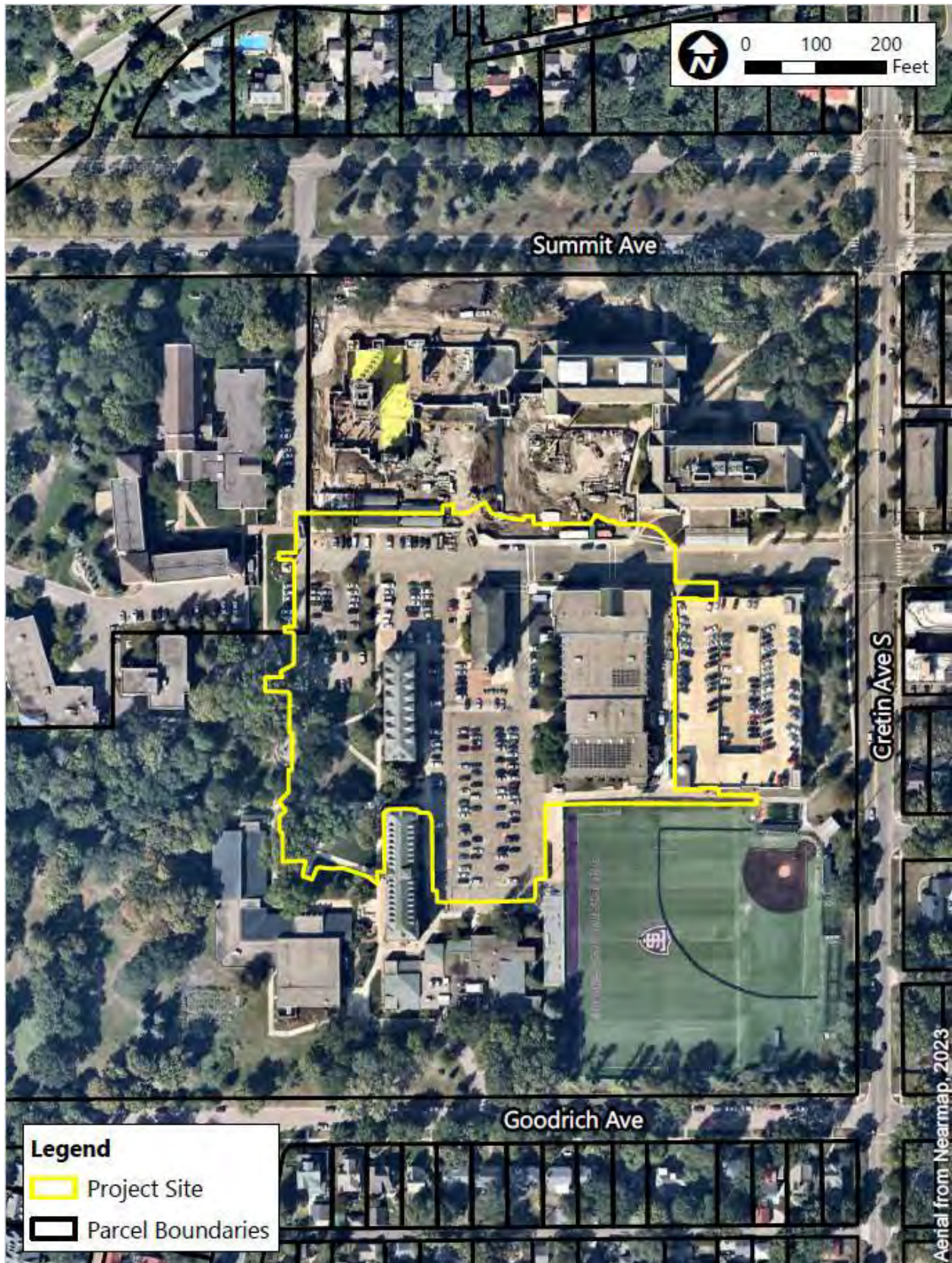


Figure 4: Existing Land Use

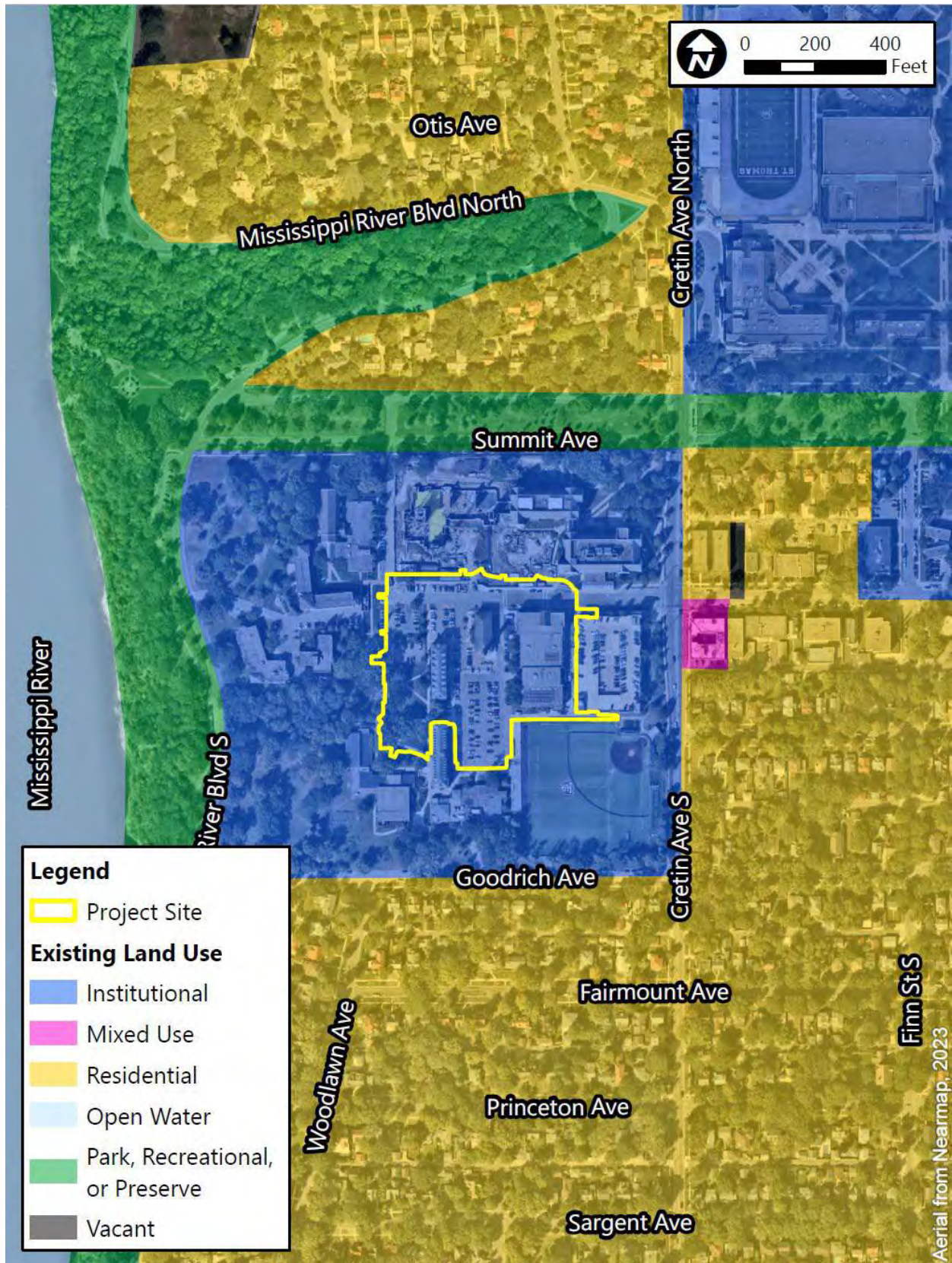


Figure 5: Existing Zoning

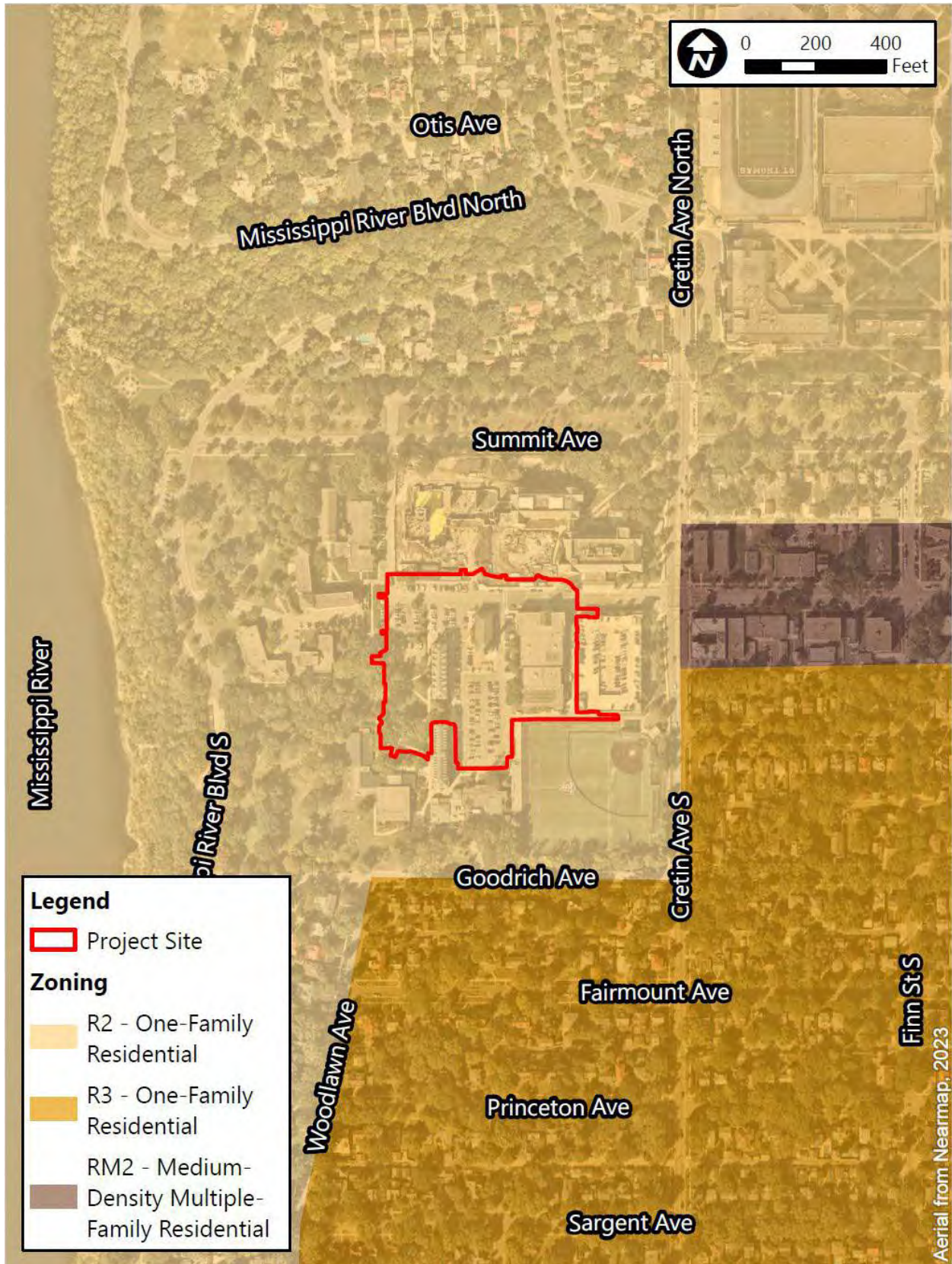


Figure 6: Zoning Overlay Districts

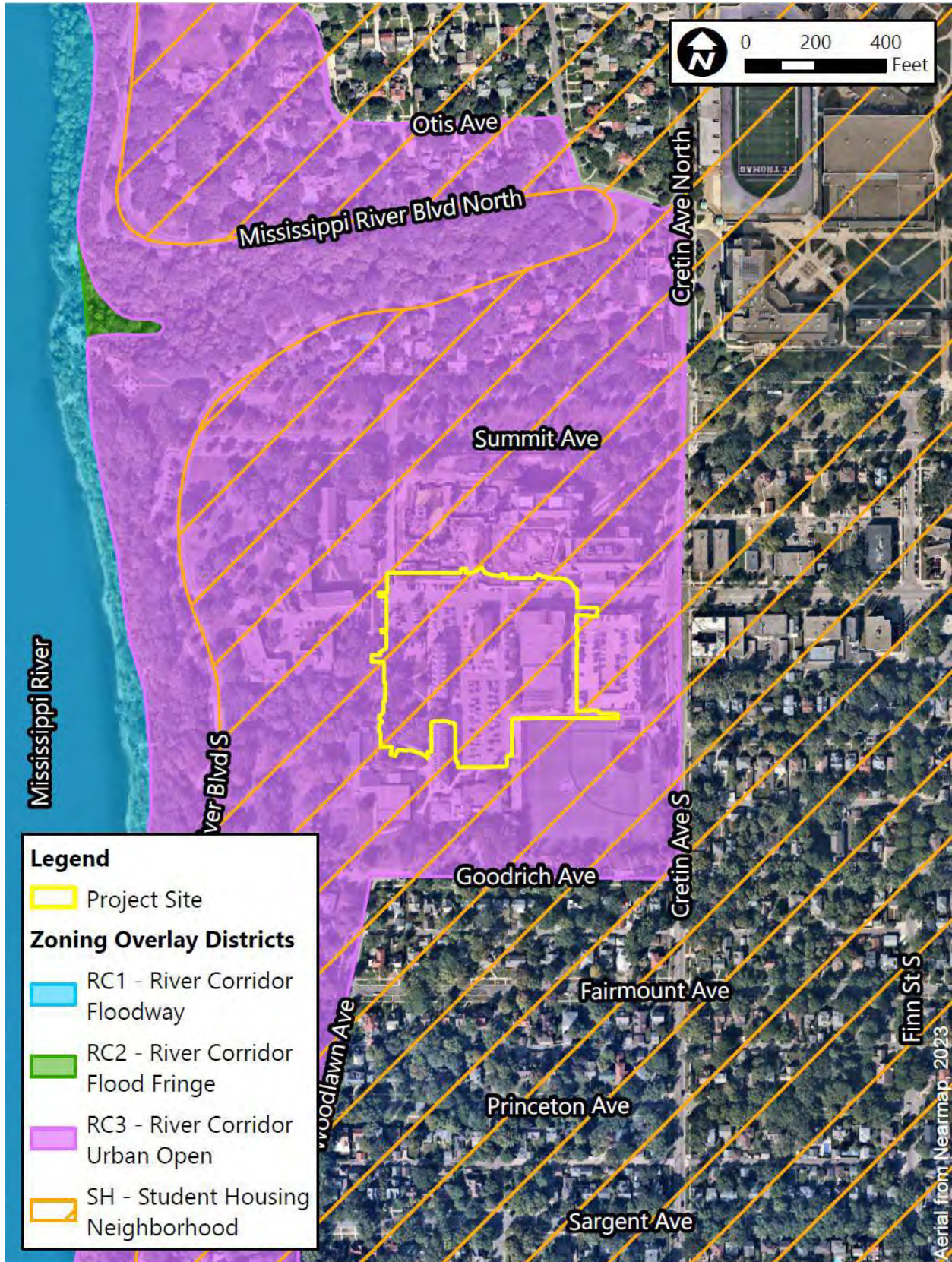


Figure 7: Water Resources



Figure 8: What's In My Neighborhood Sites Within 200 feet of the Project Site

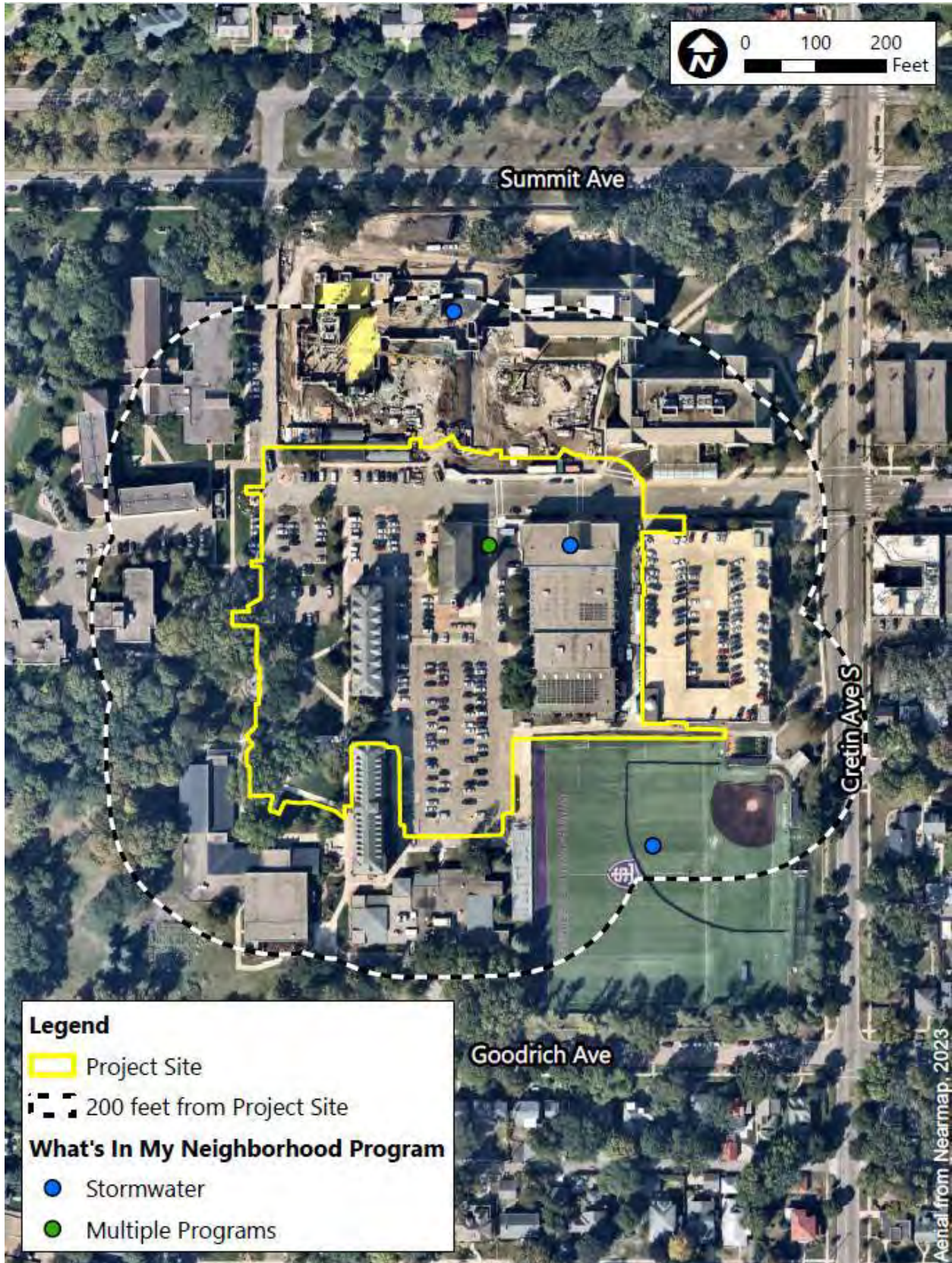


Figure 9: Historic Resources Within 500 feet of the Project Site



Appendix A

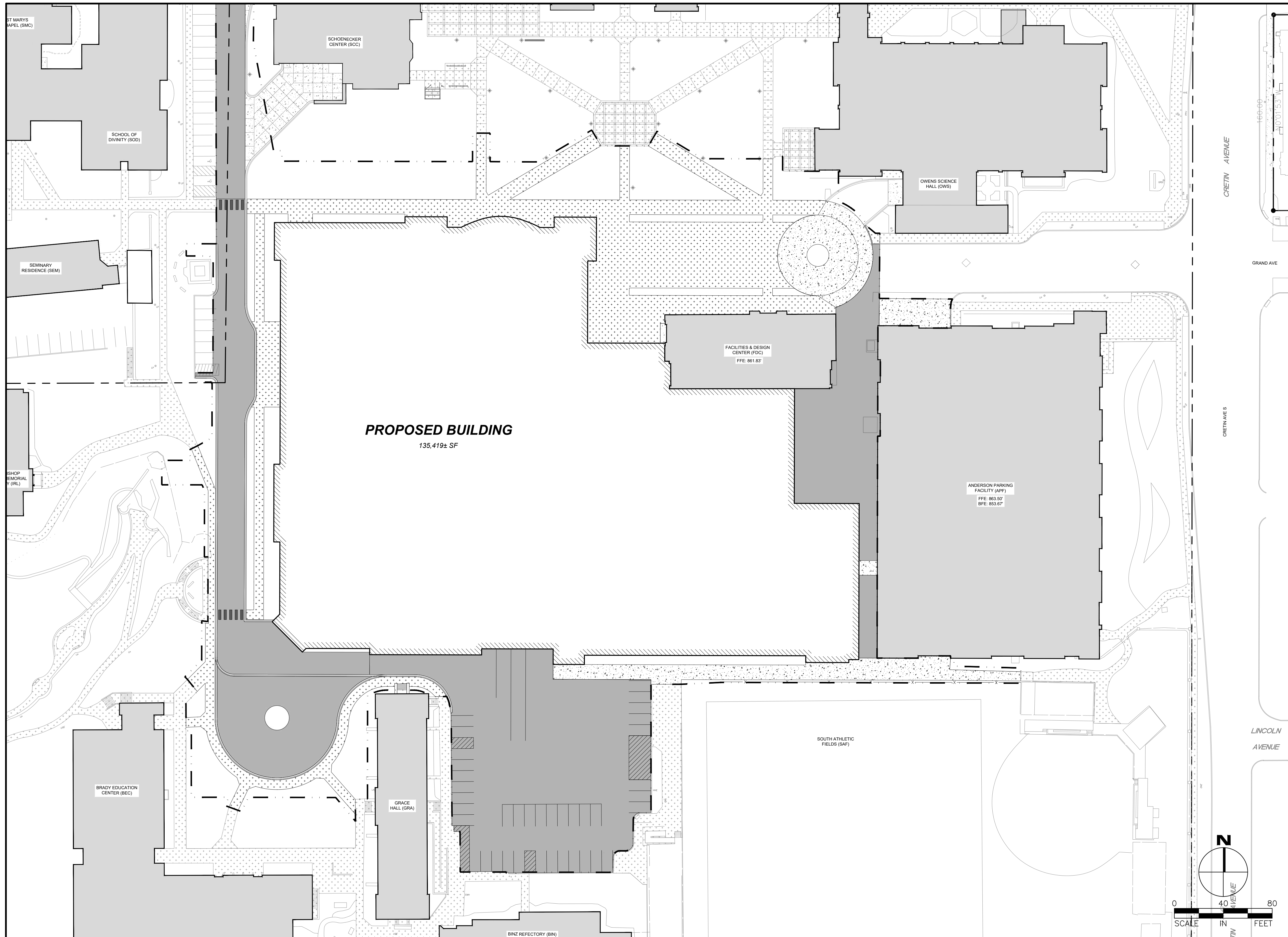
Site Plan



LEGEND:

EXISTING	PROPOSED	
		STORM SEWER PIPE
		SOLID DRAIN TILE
		PERFORATED DRAIN TILE
		STORM INLET
		STORM MANHOLE
		STORMWATER SYSTEM
		SANITARY SEWER PIPE
		SANITARY SEWER FORCE MAIN
		SANITARY SEWER MANHOLE
		SANITARY SEWER CLEANOUT
		WATER MAIN
		HYDRANT
		GATE VALVE
		WATER MANHOLE
		METER
		FIRE SPRINKLER
		IRRIGATION
		NATURAL GAS
		ELECTRIC OVERHEAD
		ELECTRIC UNDERGROUND
		FIBER OPTIC OVERHEAD
		FIBER OPTIC UNDERGROUND
		TELEPHONE OVERHEAD
		TELEPHONE UNDERGROUND
		CABLE OVERHEAD
		CABLE UNDERGROUND
		STEAM
		CHILLED WATER
		ELECTRIC MANHOLE
		TRANSFORMER
		LIGHT POLES
		POWER POLE
		GAS VALVE
		GAS METER
		FIBER OPTIC MANHOLE
		CABLE MANHOLE
		CABLE BOX
		TELEPHONE MANHOLE
		TELEPHONE BOX
		UTILITY TUNNEL
		UTILITY REMOVAL





LEGEND:

EXISTING	PROPOSED	
		PROPERTY BOUNDARY
		LOT/TRACT LINE
		CURB
		EASEMENT
		BITUMINOUS
		CONCRETE PAVEMENT
		CONCRETE SIDEWALK
		GRAVEL
		CHAIN LINK FENCE
		WOOD FENCE
		NORMAL WATER LEVEL
		DRAINAGE SWALE
		BSBL — BSBL
		PSBL — PSBL
		BUILDING SETBACK LINE
		PARKING SETBACK LINE

Appendix B

Agency Correspondence



Formal Natural Heritage Review - Cover Page

See next page for results of review. A draft watermark means the project details have not been finalized and the results are not official.

Project Name: University of St. Thomas Multipurpose Arena

Project Proposer: Ryan Companies

Project Type: Development, Commercial/Institutional/Industrial

Project Type Activities: Tree Removal; Structure Removal or Bridge Removal

TRS: T28 R23 S5

County(s): Ramsey

DNR Admin Region(s): Central

Reason Requested: State EAW

Project Description: Ryan Companies proposes to develop the University of St. Thomas Multipurpose Arena on the existing campus. Three existing buildings onsite will be demolished ...

Existing Land Uses: The project site is currently part of the University of St. Thomas campus and includes buildings, impervious surfaces, and managed/landscaped open green space.

Landcover / Habitat Impacted: The proposed project will include one building, impervious surfaces, and managed/landscaped open green space.

Waterbodies Affected: No wetlands or surface waters are present within the project site; therefore, no impacts are anticipated.

Groundwater Resources Affected: N/A

Previous Natural Heritage Review: No

Previous Habitat Assessments / Surveys: No

SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	No Comments	No Further Review Required
Ecologically Significant Area	Comments	Protected Wetlands: Calcareous Fens
State-Listed Endangered or Threatened Species	Needs Further Review	State-protected Species in Vicinity
State-Listed Species of Special Concern	Comments	Recommendations
Federally Listed Species	Comments	Visit IPaC for Federal Review RPBB High Potential Zone



March 29, 2023

Project Name: University of St. Thomas Multipurpose Arena

Project Proposer: Ryan Companies

Project Type: Development, Commercial/Institutional/Industrial

Project ID: MCE #2023-00262

AUTOMATED RESULTS: FURTHER REVIEW IS NEEDED

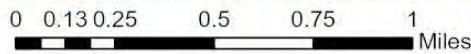
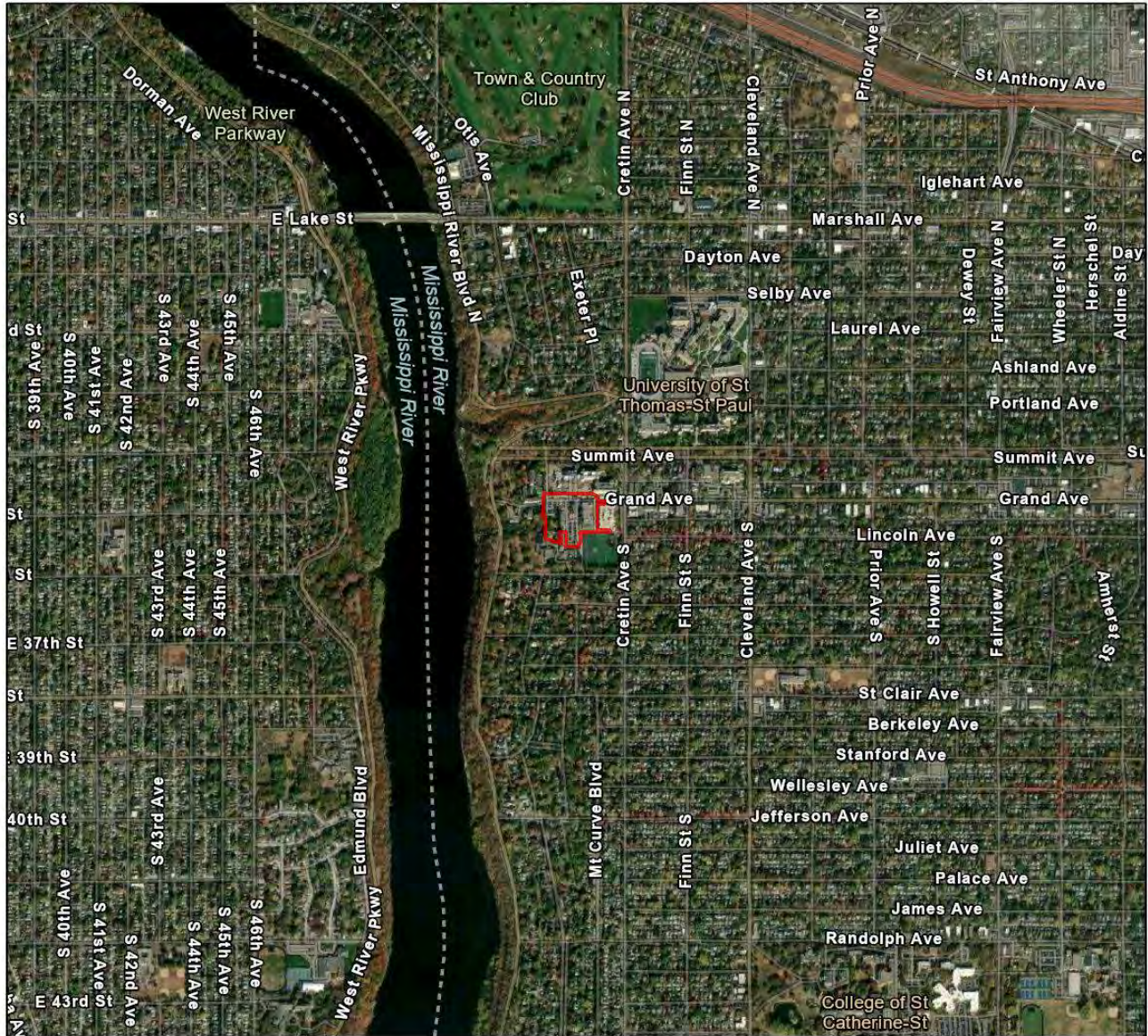
As requested, the above project has undergone an automated review for potential impacts to rare features. Based on this review, one or more rare features may be impacted by the proposed project and further review by the Natural Heritage Review Team is needed. You will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

Please refer to the table on the cover page of this report for a summary of potential impacts to rare features. For additional information or planning purposes, use the Explore Page in Minnesota Conservation Explorer to view the potentially impacted rare features or to create a Conservation Planning Report for the proposed project.

If you have additional information to help resolve the potential impacts listed in the summary results, please attach related project documentation in the Edit Details tab of the Project page. Relevant information includes, but is not limited to, additional project details, completed habitat assessments, or survey results. This additional information will be considered during the project review.

University of St. Thomas Multipurpose Arena

Aerial Imagery With Locator Map



 Project Boundary

Project Type: Development, Commercial/Institutional/Industrial

Project Size (acres): 6.44

County(s): Ramsey

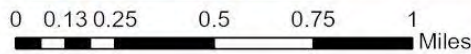
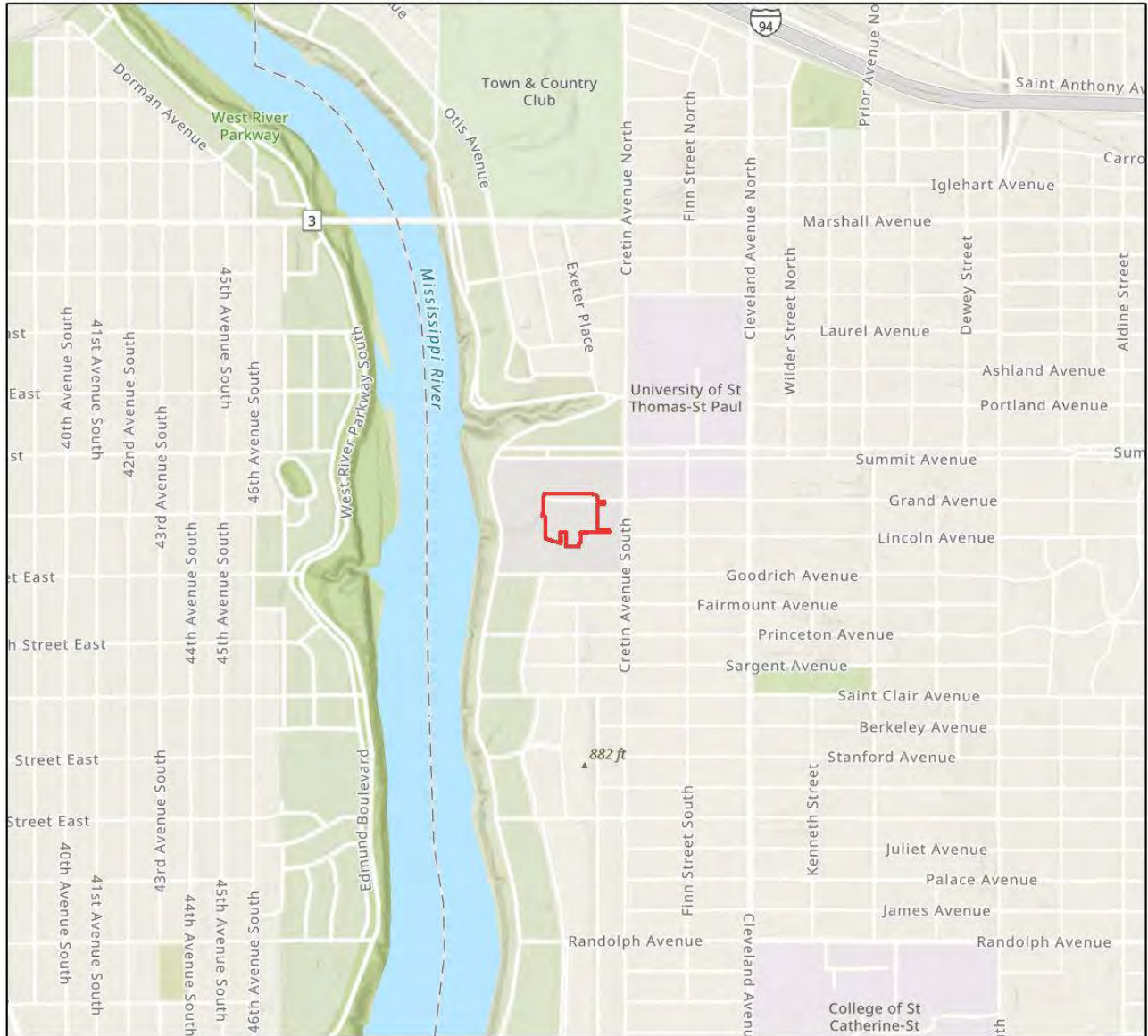
TRS: T28 R23 S5

City of Minneapolis, Metropolitan Council, MetroGIS, Three Rivers Park District, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA



University of St. Thomas Multipurpose Arena

USA Topo Basemap With Locator Map



 Project Boundary

Project Type: Development, Commercial/Institutional/Industrial

Project Size (acres): 6.44

County(s): Ramsey

TRS: T28 R23 S5

Esri, NASA, NGA, USGS, FEMA
City of Minneapolis, Metropolitan Council, MetroGIS, Three Rivers Park District,
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,



University of St. Thomas Multipurpose Arena EAW NHIS Species Attachment

Kimley-Horn has been contracted to complete an EAW for the University of St. Thomas Multipurpose Arena located in Saint Paul, Ramsey County, MN. Ryan Companies is proposing to redevelop the 6.1-acre project site, currently part of the University of St. Thomas campus, into a multipurpose arena to house a competition venue, practice facilities, coaching offices, locker rooms, and student athlete support services.

A review of the DNR Natural Heritage Inventory System database per license agreement LA-1074 was conducted for the project site and the area within one mile of the project site. This review identified 20 records: 3 records which intersect the project site and 17 additional records within 1 mile of the project site.

One record for Handsome Sedge (*Carex Formosa*), a state-listed endangered species, intersects the project corridor. The preferred habitat for this forest sedge includes forested slopes along the Mississippi River in Ramsey County. No suitable habitat for Handsome Sedge is located within the project site; thus, no impacts to the species are anticipated.

One record for the Kentucky Coffee Tree (*Gymnocladus dioica*), a state-listed special concern species, intersects the project corridor. This deciduous tree is found in mesic hardwood forest on terraces of the Minnesota River. This record was last observed in 1909. Based on the nature of the project as an institutional campus with landscaping, this species is not anticipated to occur within the project site; therefore, we do not anticipate any adverse impacts to this species.

One record for Swamp White Oak (*Quercus bicolor*), a state-listed special concern species, intersects the project corridor, and two records are located within one mile of the project. The preferred habitat for this deciduous tree is floodplain forests along the Mississippi River. No suitable habitat for Swamp White Oak is located within the project site; therefore, no impacts to the species are anticipated.

Four records of the Rusty Patched Bumble Bee (*Bombus affinis*), a federally-listed endangered species, are located within one mile of the project site. The preferred habitat for this species includes grasslands and tallgrass prairies. The project site is an institutional campus with impervious surfaces, structures, and landscaping. Landscaping onsite includes trees and mowed grass; therefore, no suitable habitat for the Rusty Patched Bumble Bee will be disturbed and no impacts are anticipated.

One record of Higgins Eye (*Lampsilis higginsii*), a federally-listed and state-listed endangered species, is located within one mile of the project site. The Higgins Eye occurs only in the Mississippi River and the lower portion of some of its large tributaries, occupying stable substrates that vary from sand to boulders. There are no surface water features within the project site; thus no impacts to the Higgins Eye are anticipated.

One record of Round Pigtoe (*Pleurobema sintoxia*), a state-listed special concern species, is located within one mile of the project site. Preferred habitat of the Round Pigtoe is fast current areas dominated by coarse sand and gravel substrate in medium to large rivers. They can occasionally be found in small rivers. There are no surface water features within the project site; thus no impacts to the Round Pigtoe are anticipated.

Nine records of Wartyback (*Quadrula nodulata*), a state-listed threatened species, are located within one mile of the project site. The Wartyback is found in large rivers with fine or coarse substrates in areas of slow to moderate current. There are no surface water features within the project site; thus no impacts to the Wartyback are anticipated.

There are no Minnesota Biological Survey Sites of Biodiversity Significance, Native Plant Communities, or Regionally Significant Ecological Areas, or public water bodies located within the project site. Approximately 0.10 mile west of the project site lies Mississippi Gorge Regional Park, which is identified as a Minnesota Biological Survey Site of Biodiversity Significance (site name St. Paul Bluffs W), and a Native Plant Community (Mesic Hardwood Forest System). Considering these resources are not located within project limits, no adverse impacts are anticipated. The Mississippi River is located approximately 0.15 mile west of the project site and is identified as a Regionally Significant Ecological Area and a public water body. The Mississippi River is not located within the project site; therefore, no impacts are anticipated.

Based on the information listed above, no adverse impacts are anticipated to the state-listed species or the protected habitats identified.

From: [MN MNIT Data Request SHPO](#)
To: [Mayer, Susan](#)
Subject: RE: SHPO Database Search for EAW in Saint Paul, Ramsey County, Minnesota
Date: Thursday, March 30, 2023 5:52:36 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[History.xls](#)

Hello Susan,

Please see attached. Our database has no archaeological records for the given project area.

Jim



SHPO Data Requests
Minnesota State Historic Preservation Office
50 Sherburne Avenue, Suite 203
Saint Paul, MN 55155
(651) 201-3299
datarequestshpo@state.mn.us

Notice: This email message simply reports the results of the cultural resources database search you requested. The database search is only for previously known archaeological sites and historic properties. **IN NO CASE DOES THIS DATABASE SEARCH OR EMAIL MESSAGE CONSTITUTE A PROJECT REVIEW UNDER STATE OR FEDERAL PRESERVATION LAWS** – please see our website at <https://mn.gov/admin/shpo/protection/> for further information regarding our Environmental Review Process.

Because the majority of archaeological sites in the state and many historic/architectural properties have not been recorded, important sites or properties may exist within the search area and may be affected by development projects within that area. Additional research, including field surveys, may be necessary to adequately assess the area's potential to contain historic properties or archaeological sites.

Properties that are listed in the National Register of Historic Places (NRHP) or have been determined eligible for listing in the NRHP are indicated on the reports you have received, if any. The following codes may be on those reports:

NR – National Register listed. The properties may be individually listed or may be within the boundaries of a National Register District.

CEF – Considered Eligible Findings are made when a federal agency has recommended that a property is eligible for listing in the National Register and MN SHPO has accepted the recommendation for the purposes of the Environmental Review Process. These properties need to be further assessed before they are officially listed in the National Register.

SEF – Staff eligible Findings are those properties the MN SHPO staff considers eligible for listing in the National Register, in circumstances other than the Environmental Review Process.

DOE – Determination of Eligibility is made by the National Park Service and are those properties that are eligible for listing in the National Register, but have not been officially listed.

CNEF – Considered Not Eligible Findings are made during the course of the Environmental Review Process. For the purposes of the review a property is considered not eligible for listing in the National Register. These properties may need to be reassessed for eligibility under additional or alternate contexts.

Properties without NR, CEF, SEF, DOE, or CNEF designations in the reports may not have been evaluated and therefore no assumption to their eligibility can be made. Integrity and contexts change over time, therefore any eligibility determination made ten (10) or more years from the date of the current survey are considered out of date and the property will need to be reassessed.

If you require a comprehensive assessment of a project's potential to impact archaeological sites or historic/architectural properties, you may need to hire a qualified archaeologist and/or historian. If you need assistance with a project review, please contact Kelly Gragg-Johnson, Environmental Review Specialist @ 651-201-3285 or by email at kelly.graggjohnson@state.mn.us.

The Minnesota SHPO Archaeology and Historic/Architectural Survey Manuals can be found at <https://mn.gov/admin/shpo/identification-evaluation/>.

Please [subscribe to receive SHPO notices](#) for the most current updates regarding office hours, accessing research files, or changes in submitting materials to the SHPO.

To access historic resource information please visit our webpage on [Using SHPO's Files](#).



From: Mayer, Susan <Susan.Mayer@kimley-horn.com>
Sent: Wednesday, March 29, 2023 10:29 AM
To: MN_MNIT_Data Request SHPO <DataRequestSHPO@state.mn.us>
Subject: SHPO Database Search for EAW in Saint Paul, Ramsey County, Minnesota

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello,

Kimley-Horn is preparing an EAW for the University of St. Thomas Multipurpose Arena in Saint Paul, Ramsey County, Minnesota. I am writing to request a search of the Minnesota Statewide Inventory Database for the site located in the following section(s), township(s), and range(s):

¼ Section	Section(s)	Township	Range
SE	5	28N	23W

See the attached figure of the project location. The EAW will examine the potential impacts of proposed development within the study area.

Please let me know if you have any questions or need additional information.

Thank you,

Susan Mayer | Environmental Scientist-Analyst

Kimley-Horn | 767 Eustis Street, Suite 100, Minneapolis, MN 55114

Direct: 612-254-7320 | Mobile: 414-510-2229 | Kimley-Horn.com

Appendix C

Greenhouse Gas (GHG) Analysis

Emissions Summary

Guidance

The total GHG emissions from each source category are provided below. You may also use this summary sheet to fill out the *Annual GHG Inventory Summary and Goal Tracking Form* as this calculator only quantifies one year of emissions at a time.

<https://www.epa.gov/climateleadership/center-corporate-climate-leadership-annual-ghg-inventory-summary-and-goal-tracking>

By entering the data below into the appropriate cell of the *Annual GHG Inventory Summary and Goal Tracking Form*, you will be able to compare multiple years of data.

If you have multiple Calculator files covering sub-sets of your inventory for a particular reporting period, sum each of the emission categories (e.g. Stationary Combustion) to an organizational total, which then can be entered into the *Annual GHG Inventory Summary and Goal Tracking Form*.

(A) Enter organization information into the orange cells. Other cells on this sheet will be automatically calculated from the data entered in the sheets in this workbook. Blue cells indicate required emission sources if applicable. Green cells indicate scope 3 emission sources and offsets, which organizations may optionally include in their inventory.

(B) The "Go To Sheet" buttons can be used to navigate to the data entry sheets.

Organizational Information:

Organization Name:	University of St. Thomas Arena EAW (Existing)		
Organization Address:			
Inventory Reporting Period:	e.g., Calendar Year 2020, Fiscal Year 2020		
	Start:	MM/DD/YY	End: MM/DD/YY
Name of Preparer:	Koehl Simmons		
Phone Number of Preparer:			
Date Prepared:			

Summary of Organization's Emissions:

Scope 1 Emissions

Go To Sheet	Stationary Combustion	161	CO ₂ -e (metric tons)
Go To Sheet	Mobile Sources	0	CO ₂ -e (metric tons)
Go To Sheet	Refrigeration / AC Equipment Use	0	CO ₂ -e (metric tons)
Go To Sheet	Fire Suppression	0	CO ₂ -e (metric tons)
Go To Sheet	Purchased Gases	0	CO ₂ -e (metric tons)

Location-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	523	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Market-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	523	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Total organization Emissions

Total Scope 1 & Location-Based Scope 2	684	CO ₂ -e (metric tons)
Total Scope 1 & Market-Based Scope 2	684	CO ₂ -e (metric tons)

Reductions

Go To Sheet	Offsets	0	CO ₂ -e (metric tons)
	Net Scope 1 and 2 Location-Based Emissions	684	CO ₂ -e (metric tons)
	Net Scope 1 and 2 Market-Based Emissions	684	CO ₂ -e (metric tons)

Scope 3 Emissions

Go To Sheet	Employee Business Travel	0	CO ₂ -e (metric tons)
Go To Sheet	Employee Commuting	0	CO ₂ -e (metric tons)
Go To Sheet	Product Transport	0	CO ₂ -e (metric tons)
Go To Sheet	Waste	274	CO ₂ -e (metric tons)

Required Supplemental Information

Go To Sheet	Biomass CO ₂ Emissions from Stationary Sources	0	CO ₂ -e (metric tons)
Go To Sheet	Biomass CO ₂ Emissions from Mobile Sources	0	CO ₂ -e (metric tons)

Operational Boundary Questions - Emissions Sources to Include

Guidance

Use the questions below to help you determine which emissions sources should be included in the inventory.

Emissions Source Questions

A typical office-based organization will likely have the following (scope 1 and scope 2) emissions sources:

- Stationary Combustion
- Refrigeration and AC
- Electricity

If you answer "yes" to a question below, that emissions source should be included in your inventory. For each facility within the defined organizational boundary, collect the necessary data for the selected time period. Use the corresponding Excel sheet to quantify these emissions.

Tip: you may need to ask your landlord about heating sources, steam purchased and refrigerants

Stationary Combustion	Yes or No?
Do you have facilities that burn fuels on-site (e.g., natural gas, propane, coal, fuel oil for heating, diesel fuel for backup generators, biomass fuels)?	N
Mobile Sources	
Do any vehicles fall within your organizational boundary? This can include cars, trucks, propane forklifts, aircraft, boats. Only vehicles owned or leased by your organization should be included here.	N
Refrigeration and Air Conditioning	
Do your facilities use refrigeration or air conditioning equipment?	?
Fire Suppression	
Do your facilities use chemical fire suppressants?	?
Purchased Gases	
Do you purchase any industrial gases for use in your business? These gases may be purchased for use in manufacturing, testing, or laboratories.	?
Waste Gases	
Are VOCs combusted in thermal oxidizers in your facilities?	?
Do you flare any gases on-site?	?
Electricity	
Does your inventory include facilities that use electricity?	Y
Steam	
Do you purchase steam for heating or cooling in your facilities?	?
Market-Based Emission Factors (entered on Electricity and or Steam tabs)	
Do you purchase renewable energy certificates (RECs) or green power products? Do you purchase electricity through a power purchase agreement (PPA)? Do you have supplier-specific emission factors?	N

The questions below refer to scope 3 emissions sources and offsets. If you answer "yes" you may choose whether or not to include these emissions sources in your inventory. Use the corresponding sheet to enter data.

Business Travel	Yes or No?
Do your employees travel for business using transportation other than owned or leased vehicles (e.g., commercial airline flights, rental cars, trains)?	?
Employee Commuting	
Do your employees commute to work in personal vehicles or use public transportation?	?
Product Transport	
Do you hire another company to transport products or other materials to or from your facilities?	?
Waste Generated in Operations	
Do you generate waste that is disposed of in a facility owned by another organization?	Y
Offsets	
Do you purchase greenhouse gas offsets?	N

Scope 2 Emissions from Purchase of Electricity



Guidance

The Indirect Emissions from Purchased Electricity Guidance document provides guidance for quantifying two scope 2 emissions totals, using a location-based method and a market-based method.

- (A) Enter total annual electricity purchased in kWh and each eGRID subregion for each facility or site in ORANGE cells of Table 1.
(B) If electricity consumption data are not available for a facility, an estimate should be made for completeness.
(C) Select "eGRID subregion" from drop box and enter "Electricity Purchased."
(D) See the market-based emission factor hierarchy on the market-based method Help sheet.

Help - Market-Based Method

Tips: Enter electricity usage by location and then look up the eGRID subregion for each location. If you purchase renewable energy that is less than 100% of your site's electricity, see the example in the market-based method Help sheet.

Table 1. Total Amount of Electricity Purchased by eGRID Subregion

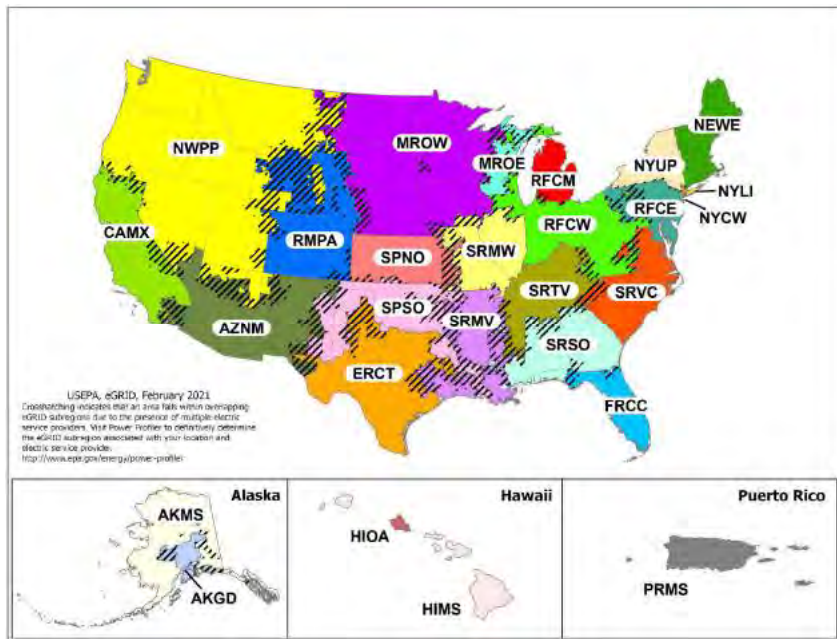
Table with 12 columns: Source ID, Source Description, Source Area (sq ft), eGRID Subregion, Electricity Purchased (kWh), CO2 Emissions (lb/MWh), CH4 Emissions (lb/MWh), N2O Emissions (lb/MWh), CO2 Emissions (lb), CH4 Emissions (lb), N2O Emissions (lb), and Location-Based Emissions (CO2, CH4, N2O in lb).

GHG Emissions

Summary table for GHG Emissions showing CO2 Equivalent Emissions (metric tons) for Location-Based Electricity Emissions (522.8) and Market-Based Electricity Emissions (522.8).

Notes:
1. CO2, CH4 and N2O emissions are estimated using methodology provided in EPA's Center for Corporate Climate Leadership Greenhouse Gas Inventory Guidance
- Indirect Emissions from Purchased Electricity (January 2016).

Figure 1. EPA eGRID2019, February 2021.



Scope 3 Emissions from Waste

Guidance

- (A) Enter annual waste data in ORANGE cells. Example entry is shown in first row (GREEN Italics).
(B) Choose the appropriate material and disposal method from the drop down options. For the average-data method, use one of the mixed material types, such as mixed MSW. If the exact waste material is not available, consider an appropriate proxy. For example, dimensional lumber can be used as a proxy for wood furniture.
(C) Choose an appropriate disposal method. Note that not all disposal methods are available for all materials. If there is a #NA or # Value error in the emissions column, you must pick a new material type or appropriate disposal method.

Table 1. Waste Disposal Weight by Waste Material and Disposal Method (CO2, CH4, and N2O)

Table with 7 columns: Source ID, Source Description, Waste Material, Disposal Method, Weight, Unit, CO2e Emissions (kg). Includes data for Bldg-012, Nonresidential Buildings, Residential, etc.

GHG Emissions

Total Emissions by Disposal Method

Summary table with 2 columns: Waste Material, CO2e (kg). Rows include Recycled, Landfilled, Combusted, Composted, Anaerobically Digested (Dry/Wet Digestate with Curing).

Emissions Summary

Guidance

The total GHG emissions from each source category are provided below. You may also use this summary sheet to fill out the *Annual GHG Inventory Summary and Goal Tracking Form* (.xls) as this calculator only quantifies one year of emissions at a time.

<https://www.epa.gov/climateleadership/target-setting>

By entering the data below into the appropriate cell of the *Annual GHG Inventory Summary and Goal Tracking Form*, you will be able to compare multiple years of data.

If you have multiple Calculator files covering sub-sets of your inventory for a particular reporting period, sum each of the emission categories (e.g. Stationary Combustion) to an organizational total, which then can be entered into the *Annual GHG Inventory Summary and Goal Tracking Form*.

(A) Enter organization information into the orange cells. Other cells on this sheet will be automatically calculated from the data entered in the sheets in this workbook. Blue cells indicate required emission sources if applicable. Green cells indicate scope 3 emission sources and offsets, which organizations may optionally include in its inventory.

(B) The "Go To Sheet" buttons can be used to navigate to the data entry sheets.

Organizational Information:

Organization Name:	University of St. Thomas		
Organization Address:	2115 Summit Ave, St Paul, MN 55105		
Inventory Reporting Period:	<i>Proposed Scenario</i>		
	Start:	Jan-23	End: Dec-23
Name of Preparer:	Kimley-Horn		
Phone Number of Preparer:	763-251-1015		
Date Prepared:	Apr-23		

Summary of Organization's Emissions:

Scope 1 Emissions

Go To Sheet	Stationary Combustion	914	CO ₂ -e (metric tons)
Go To Sheet	Mobile Sources	1,239	CO ₂ -e (metric tons)
Go To Sheet	Refrigeration / AC Equipment Use	0	CO ₂ -e (metric tons)
Go To Sheet	Fire Suppression	0	CO ₂ -e (metric tons)
Go To Sheet	Purchased Gases	0	CO ₂ -e (metric tons)

Location-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	1,539	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Market-Based Scope 2 Emissions

Go To Sheet	Purchased and Consumed Electricity	1,539	CO ₂ -e (metric tons)
Go To Sheet	Purchased and Consumed Steam	0	CO ₂ -e (metric tons)

Total organization Emissions

Total Scope 1 & Location-Based Scope 2	3,692	CO ₂ -e (metric tons)
Total Scope 1 & Market-Based Scope 2	3,692	CO ₂ -e (metric tons)

Reductions

Go To Sheet	Offsets	0	CO ₂ -e (metric tons)
Net Scope 1 and 2 Location-Based Emissions	3,692	CO ₂ -e (metric tons)	
Net Scope 1 and 2 Market-Based Emissions	3,692	CO ₂ -e (metric tons)	

Scope 3 Emissions

Go To Sheet	Employee Business Travel	0	CO ₂ -e (metric tons)
Go To Sheet	Employee Commuting	0	CO ₂ -e (metric tons)
Go To Sheet	Upstream Transportation and Distribution	0	CO ₂ -e (metric tons)
Go To Sheet	Waste	531	CO ₂ -e (metric tons)

Required Supplemental Information

Go To Sheet	Biomass CO ₂ Emissions from Stationary Sources	0	CO ₂ -e (metric tons)
Go To Sheet	Biomass CO ₂ Emissions from Mobile Sources	0	CO ₂ -e (metric tons)

Lignite Coal	0	short tons
Natural Gas	16,764,133	scf
Distillate Fuel Oil No. 2	0	gallons
Residual Fuel Oil No. 6	0	gallons
Kerosene	0	gallons
Liquefied Petroleum Gases (LPG)	0	gallons
Wood and Wood Residuals	0	short tons
Landfill Gas	0	scf

Total Organization-Wide CO₂, CH₄ and N₂O Emissions from Stationary Source Fuel Combustion

Fuel Type	CO ₂ (kg)	CH ₄ (g)	N ₂ O (g)
Anthracite Coal	0.0	0.0	0.0
Bituminous Coal	0.0	0.0	0.0
Sub-bituminous Coal	0.0	0.0	0.0
Lignite Coal	0.0	0.0	0.0
Natural Gas	912,639.4	17,267.1	1,676.4
Distillate Fuel Oil No. 2	0.0	0.0	0.0
Residual Fuel Oil No. 6	0.0	0.0	0.0
Kerosene	0.0	0.0	0.0
Liquefied Petroleum Gases (LPG)	0.0	0.0	0.0
Total Fossil Fuel Emissions	912,639.4	17,267.1	1,676.4
Wood and Wood Residuals	0.0	0.0	0.0
Landfill Gas	0.0	0.0	0.0
Total Non-Fossil Fuel Emissions	0.0	0.0	0.0
Total Emissions for all Fuels	912,639.4	17,267.1	1,676.4

Total CO₂ Equivalent Emissions (metric tons) - Stationary Combustion	913.6
Total Biomass CO₂ Equivalent Emissions (metric tons) - Stationary Combustion	0.0

Scope 3 Emissions from Waste

Guidance

- (A) Enter annual waste data in ORANGE cells. Example entry is shown in first row (GREEN Italics).
(B) First, choose the appropriate material then the disposal method from the drop down options. For the average-data method, use one of the mixed material types, such as mixed MSW. If the exact waste material is not available, consider an appropriate proxy. For example, dimensional lumber can be used as a proxy for wood furniture.
(C) Choose an appropriate disposal method. Note that not all disposal methods are available for all materials. If there is a #NA or # Value error in the emissions column, you must pick a new material type or appropriate disposal method.

Table 1. Waste Disposal Weight by Waste Material and Disposal Method (CO2, CH4 and N2O)

Table with 7 columns: Source ID, Source Description, Waste Material, Disposal Method, Weight, Unit, CO2e Emissions (kg). Includes example data for Bldg-012, East Power Plant Finished Goods, Copper Wire, Landfilled, 1,000 metric ton, 22,040 kg.

Total Emissions by Disposal Method

Waste Material	CO ₂ e (kg)
Recycled	119,214
Landfilled	-
Combusted	412,258
Composted	-
Anaerobically Digested (Dry Digestate with Curing)	-
Anaerobically Digested (Wet Digestate with Curing)	-

Total CO₂ Equivalent Emissions (metric tons) - Waste	531.5
--	--------------

Appendix D

Traffic Impact Analysis

University of St. Thomas (UST) Multipurpose Arena EAW

Transportation Study

Prepared for:

City of St. Paul



June 9, 2023

SRF No. 2316489

Table of Contents

Table of Contents	0
List of Figures	1
List of Tables	1
Introduction	2
Existing Conditions	4
Study Intersections	4
Traffic Volumes	4
Roadway Characteristics	5
Multimodal Facilities	6
Safety Analysis	6
Operations Analysis.....	9
Parking.....	11
UST Campus Parking/Utilization Counts	11
Permit Parking Locations	11
Proposed Development	14
2025 Non-Event Conditions	16
Parking Analysis	16
Event Background/Assumptions	19
UST Current Events.....	19
Event Schedule/Times.....	19
Event Attendances.....	21
Analysis Scenarios	21
Event Characteristics.....	23
Auto-Occupancy	23
Modal Split Assumptions.....	23
Trip Generation	24
Pedestrian Volumes	24
2025 Event Conditions	26
Parking Demand Analysis (Issue Identification with No Mitigation)	26
Operations Analysis (Issue Identification with No Mitigation)	29
Mitigation Strategies	34
Parking.....	34
Event Management Recommendations.....	36
Other Considerations	39
Operations Analysis with Mitigation.....	40
Typical Event (3,000) Operations and Mitigation.....	43
Conclusion	43

List of Figures

Figure 1.	Project Location	3
Figure 2.	Safety Analysis	7
Figure 3.	UST Campus Parking Summary	12
Figure 4.	Permit Parking Locations.....	13
Figure 5.	Preliminary Site Plan.....	15
Figure 6.	Estimated Event Schedule.....	20
Figure 7.	Attendances of Similar Programs.....	22
Figure 8.	Directional Distribution.....	25
Figure 9.	Event Parking Supply	27
Figure 10.	Post-Event Operations Summary (No Mitigation).....	30
Figure 11.	Post-Event Operations Summary (No Mitigation).....	31
Figure 12.	Max Capacity Pre-Event Mitigation Strategies	37
Figure 13.	Max Capacity Post-Event Mitigation Strategies	38
Figure 14.	Pre-Event Operations Summary (Mitigation).....	41
Figure 15.	Post-Event Operations Summary (Mitigation).....	42

List of Tables

Table 1.	Existing Roadway Characteristics.....	5
Table 2.	Level of Service Criteria for Signalized and Unsignalized Intersections.....	9
Table 3.	Existing Conditions Intersection Capacity Analysis	10
Table 4.	Parking Demand of Impacted Lots.....	16
Table 5.	Available Parking Supply	17
Table 6.	Parking Demand Analysis.....	17
Table 7.	Estimated Event Schedule.....	20
Table 8.	Event Time Assumptions	20
Table 9.	Event Traffic During Peak Analysis Hour.....	23
Table 10.	Max Capacity (5,500 Attendees) Event Modal Split Assumptions.....	24
Table 11.	Trip Generation Estimate (Maximum Capacity Event – 5,500 Attendance).....	24
Table 12.	Available Parking Supply Before Events	26
Table 13.	Event Parking Demand Analysis	28

Introduction

SRF has completed a transportation study in conjunction with an EAW for the proposed University of St. Thomas (UST) multipurpose arena development in the City of St. Paul. The proposed arena is generally located in the southwest quadrant of the Cretin Avenue/Grand Avenue intersection within UST's south campus (see Figure 1: Project Location). The multipurpose arena is expected to have capacities ranging from 4,000- to 5,500-event patrons, depending on the event, and will primarily be utilized by the UST men's and women's hockey and basketball teams. Other events, such as university commencements, high school/youth sports, and conventions may also be held at the venue. In addition to holding events, the proposed arena is anticipated to include an auxiliary ice rink, separate men's and women's basketball practice facilities, and coaches offices/training facilities. As part of construction, three buildings are expected to be demolished, which include the Cretin Residence Hall, McCarthy Gymnasium, and a Service Center, as well as a net loss of approximately 265 surface parking spaces. The development is anticipated to be fully constructed and open by Fall of 2025.

The main objectives of the study are to evaluate the existing operations and parking within the study area, identify any transportation/parking impacts associated with the proposed arena during event and non-event conditions, and recommend potential mitigation to address any issues. The study summarizes various event related information pertaining to the arena and evaluates both typical (average) and maximum (worst-case) event conditions to identify issues areas and potential mitigation strategies. The following information provides the assumptions, analysis, and study findings offered for consideration.



Existing Conditions

Existing conditions were reviewed to establish a baseline to compare to future conditions, as well as identify current issues from a safety and capacity perspective. The evaluation of existing conditions includes various data collection efforts, such as traffic volumes and parking utilization counts, as well as a review of current transportation characteristics (roadways, pedestrians, bicycles, and transit), crashes/safety, and intersection operations, which are outlined in the following sections.

Study Intersections

The following study intersections represent the primary focus of the transportation study. These intersections were identified through discussions with UST and City staff as they relate to potential development impacts, as well as future area infrastructure needs. It should be noted that these intersections generally encompass the entire UST St. Paul campus.

- Cretin Ave N/Marshall Ave
- Cretin Ave N/Selby Ave
- Cretin Ave N/Mississippi River Blvd
- Cretin Ave N/Summit Ave
- Cretin Ave N/Grand Ave
- Cretin Ave N/Goodrich Ave
- Cleveland Ave N/Selby Ave
- Cleveland Ave N/Summit Ave
- Cleveland Ave N/Grand Ave
- Summit Ave/Mississippi River Blvd
- Summit Ave/UST South Campus Access
- Mississippi River Blvd/Goodrich Ave

Other regional intersections and access locations were also included as part of the future event operations analysis as needed to help identify event traffic impacts and any potential infrastructure/traffic control needs. These other regional locations primarily consisted of signalized intersections along Cretin Avenue and Cleveland Avenue from I-94 to the north to TH 5 to the south.

Traffic Volumes

Vehicular turning movement and pedestrian/bicyclist counts were collected at the study intersections on Thursday, March 30, 2023, during a.m. and p.m. peak periods of the study intersections (7 to 9 a.m. and 4 to 6 p.m.), as well as anticipated pre- and post-event peak hours (i.e., 6 to 7 p.m. and 9 to 10 p.m.). In addition, data was collected at the Cretin Avenue/Grand Avenue intersection on Friday, March 31, 2023, and Saturday, April 1, 2023, to understand differences in traffic volumes on weekends. It should be noted that the counts were collected while most area schools (i.e., St. Paul Public Schools) and universities (i.e., UST, St. Catherine's, Macalester College) were in session. To determine if the traffic counts were representative of an average day in the study area, MnDOT detector data was reviewed at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of an average day for the study area, therefore, no adjustments were made to the counts. In addition, turning movement counts were either collected or estimated at the regional intersections based on a combination of the newly collected data or modifying historical traffic count data.

Roadway Characteristics

A field assessment was completed to identify various roadway characteristics within the transportation system study area, such as functional classification, general configuration, posted speed limit, and presence of on-street parking. A summary of these roadway characteristics is shown in Table 1. Note that these are general characteristics and that there are some deviations within the segments of the roadways.

Table 1. Existing Roadway Characteristics

Roadway	Functional Classification ⁽¹⁾	General Configuration	Speed Limit (mph)	On-Street Parking
Cretin Avenue	Major Collector	Four-Lane Undivided ⁽²⁾	25	Yes ⁽²⁾
Cleveland Avenue	A Minor Arterial	Two-Lane Undivided	30	Yes
Mississippi River Blvd	Local Street	Two-Lane Undivided	25	No
Marshall Avenue	A Minor Arterial	Three-Lane Divided ⁽³⁾	30	Yes
Selby Avenue	Local Street	Two-Lane Undivided	25	Yes
Summit Avenue	Major Collector	Two-Lane Divided	25	Yes
Grand Avenue	Other Arterial	Three-Lane Undivided	25	Yes

(1) Functional Classification based on the City of Saint Paul 2040 Comprehensive Plan.

(2) Note various locations along Cretin Avenue contain on-street parking with time-of-day restrictions. Therefore, depending on the time of day, the corridor may operate as a two-lane roadway with parking.

(3) Generally a three-lane roadway with medians present in various locations. Note Marshall Avenue has two lanes in the westbound direction, west of Cretin Avenue.

In addition to the general roadway characteristics, there are varying types of traffic controls within the transportation system study area. The following study intersections are signalized:

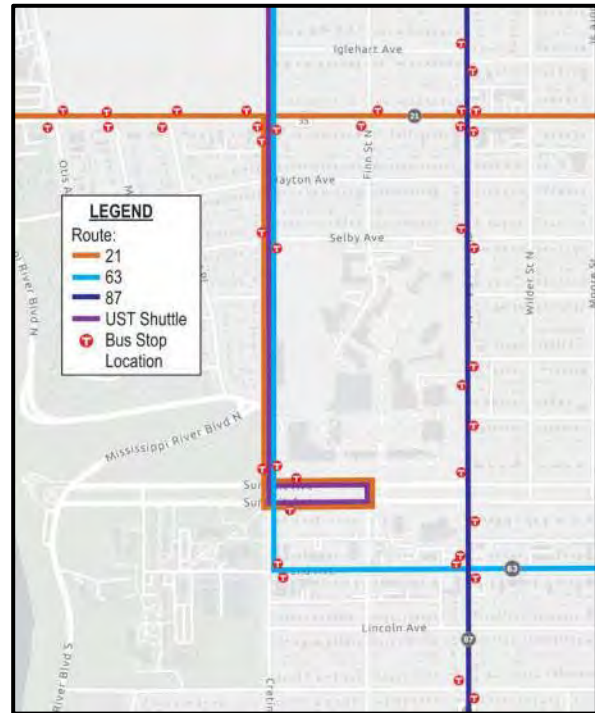
- Cretin Ave /Marshall Ave
- Cretin Ave /Summit Ave
- Cretin Ave /Grand Ave
- Cleveland Ave /Summit Ave
- Cleveland Ave /Grand Ave

The Mississippi River Boulevard/Goodrich Avenue intersection is all-way stop controlled. The remaining study intersections are unsignalized with side-street stop control. Existing geometrics, traffic controls, and volumes are shown in Appendix A.

Multimodal Facilities

The study area is well served with sidewalks and all signalized intersections surrounding campus are programmed with leading pedestrian interval (LPI) timing, which helps improve pedestrian safety. Note there is a sidewalk gap on the north side of Goodrich Avenue and there is not currently a direct pedestrian connection between Goodrich Avenue and south campus (i.e., pedestrians need to walk to/from Cretin Avenue to access Goodrich Avenue).

From a bicycle perspective, there is an off-street trail along the west side of Mississippi River Boulevard, and on-street bicycle lanes along Summit Avenue and Cleveland Avenue, as well as the west side of Mississippi River Boulevard. Note that Summit Avenue is currently undergoing a public visioning process to determine the long-term layout of the corridor.

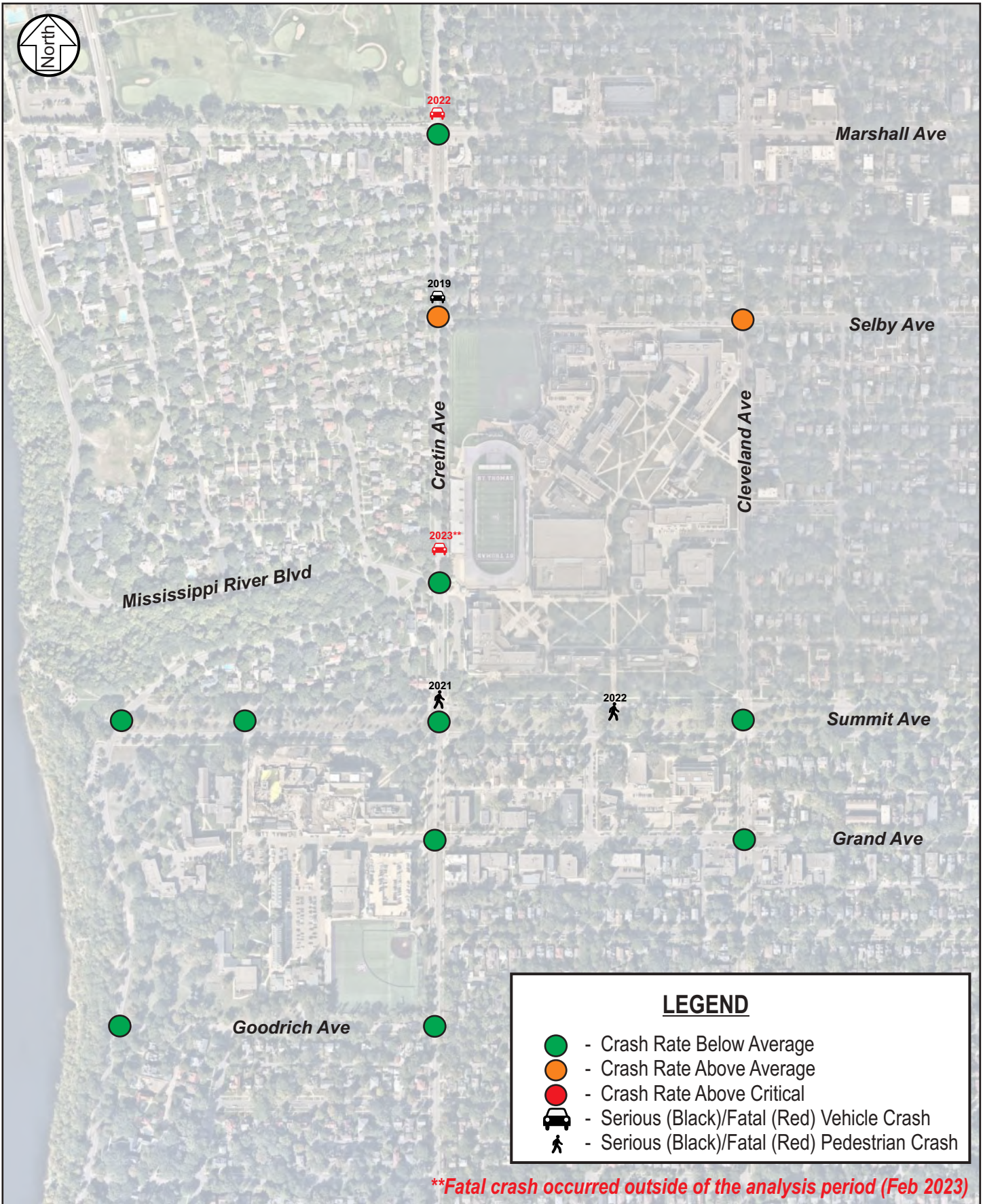


As shown in the inset, there are various Metro Transit stops on (or near) the St. Paul Campus. The Metro Transit Bus Routes include routes 21, 63, and 87, which run every 15-20 minutes and are summarized below. In addition, UST runs a shuttle bus between the St. Paul and Minneapolis campuses. The shuttle runs every 20-30 minutes and is free for all UST staff/students.

- **Route 21** – Primarily operates east-west along Marshall Avenue/Lake Street from downtown St. Paul to Uptown, providing key stops near Allianz Field that serve as a feeder to the METRO Green Line.
- **Route 63** – Primarily operates east-west along Grand Avenue and 3rd Street, serving key destinations such as the METRO Green Line, Macalester College, downtown St. Paul, and the Sun Ray Transit Center.
- **Route 87** – Primarily operates north-south along Cleveland Avenue from Ford Parkway to the Rosedale Transit Center, providing key stops at the University of Minnesota St. Paul Campus and the METRO Green Line.

Safety Analysis

While not a requirement of the EAW process, a safety analysis was requested by UST to understand any trends or geometric issues at the study intersections. The safety analysis was based on reported crashes using MnDOT's Crash Mapping Analysis Tool (MnCMAT) from January 1, 2018, through December 31, 2022, which represents the most recent five-year period available. Results of the safety analysis are summarized below and shown in Figure 2, while detailed crash type/rate information is included in Appendix B.



- There was a total of 47 crashes reported within the study area during the analysis period. The number of crashes ranged from a high of 19 crashes at the Cretin Avenue/Marshall Avenue intersection to a low of zero (0) crashes at the Cretin Avenue/Goodrich Avenue intersection.
- In order to determine the significance of the crashes, crash rates were calculated for each intersection and compared to average crash rates published by MnDOT for intersections with similar characteristics (i.e., traffic control, traffic volumes, lighting, environment, etc.) A higher than average rate does not necessarily indicate a significant crash problem. Therefore, critical rates were calculated to determine the statistical significance. If the actual rates are below the critical rates, crashes that occurred may be due to the random nature of crashes and not necessarily a geometric design or traffic control issue. Based on the results of analysis, which is illustrated in Figure 2, no study intersections are above the critical crash rate, indicating that no study intersections have a statistically significant crash problem.
- It should be noted that one (1) fatal and three (3) serious injury crashes have occurred within the study area during the analysis period, and an additional fatal accident also occurred outside of the analysis period (i.e., February 2023). Descriptions of the fatal/serious injury crashes, which are based on the police reports, are summarized below:
 - Cretin Avenue/Marshall Avenue – Fatal angle crash. Driver ran a red light, colliding with a vehicle crossing the intersection. Based on the police reports, drugs/alcohol may have played a role in the crash.
 - Cretin Avenue/Mississippi River Blvd – Fatal head-on crash. Driver crossed the centerline, colliding with oncoming traffic. Based on the police reports, drugs/alcohol may have played a role in the crash.
 - Cretin Avenue/Selby Avenue – Serious injury angle crash. Side-street vehicle failed to observe right-of-way and pulled out into oncoming traffic.
 - Note the intersection also has an above average crash rate. Two other angle crashes have occurred at the intersection within the analysis period and all three (3) angle crashes have occurred when on-street parking may be present on Cretin Avenue. On-street parking may be encroaching on sight lines at the intersection.
 - Cretin Avenue/Summit Avenue – Serious injury pedestrian crash. A pedestrian failed to yield right-of-way and walked into oncoming traffic.
 - Summit Avenue/Pedestrian Crossing (near Finn St) – Serious injury pedestrian crash. Vehicle traveling westbound failed to see pedestrian crossing the intersection.
 - Note during data collection efforts, vehicles were observed to park and/or stop within the no parking zone prior to the pedestrian crossing. Vehicles parked in this zone may block the visibility of pedestrians. While not associated with the arena project, future consideration could be made towards constructing a curb bump out for the pedestrian crossing and/or implementing yellow pavement markings to help reinforce the no-parking zone and improve pedestrian visibility.

Operations Analysis

An intersection capacity analysis was conducted to determine how traffic is currently operating at the study intersections during typical weekday a.m. and p.m. peak hour conditions. All intersections were analyzed using Synchro/SimTraffic software, which is an industry standard. Capacity analysis results identify a Level of Service (LOS) which indicates how well an intersection is operating. Intersections are graded from LOS A through LOS F. The LOS results are based on average delay per vehicle, which corresponds to the delay threshold values shown in Table 2. LOS A indicates the best traffic operation and LOS F indicates an intersection where demand exceeds capacity. Overall intersection LOS A through D is generally considered acceptable within the Twin Cities Metropolitan Area, although longer delays for short periods of time and/or for specific movements are often considered acceptable as well. In urban areas, it is common for intersections to operate at LOS E or LOS F for short periods of time, particularly when balancing other transportation modal priorities.

Table 2. Level of Service Criteria for Signalized and Unsignalized Intersections

LOS Designation	Signalized Intersection Average Delay/Vehicle (seconds)	Unsignalized Intersection Average Delay/Vehicle (seconds)
A	≤ 10	≤ 10
B	> 10 - 20	> 10 - 15
C	> 20 - 35	> 15 - 25
D	> 35 - 55	> 25 - 35
E	> 55 - 80	> 35 - 50
F	> 80	> 50

For side-street stop-controlled intersections, special emphasis is given to providing an estimate for the level of service of the side-street approach. Traffic operations at an unsignalized intersection with side-street stop control can be described in two ways. First, consideration is given to the overall intersection level of service. This takes into account the total number of vehicles entering the intersection and the capability of the intersection to support these volumes.

Second, it is important to consider the delay on the minor approach. Since the mainline does not have to stop, the majority of delay is experienced on the side-street approaches. It is typical of intersections with higher mainline traffic volumes to experience high levels of delay (poor levels of service) on the side-street approaches, but an acceptable overall intersection level of service during peak hour conditions.

Results of the existing intersection capacity analysis, shown in Table 3, indicate that all study intersections currently operate at an acceptable overall LOS D or better during the weekday a.m. and p.m. peak hours. Queuing and operational observations are discussed on Page 10, however, there are no significant operational or safety issues that would warrant improvements within the study area.

Table 3. Existing Conditions Intersection Capacity Analysis

Intersection	A.M. Peak Hour		P.M. Peak Hour	
	LOS	Delay	LOS	Delay
Cretin Avenue S / Marshall Avenue	C	26 sec.	D	53 sec.
Cretin Avenue S / Selby Avenue ⁽¹⁾	A/A	10 sec.	A/B	11 sec.
Cretin Avenue S / Mississippi River Boulevard ⁽¹⁾⁽³⁾	A/A	5 sec.	A/A	6 sec.
Cretin Avenue S / Summit Avenue	A	8 sec.	B	14 sec.
Cretin Avenue S / Grand Avenue	B	10 sec.	B	14 sec.
Cretin Avenue S / Goodrich Avenue ⁽¹⁾	A/A	9 sec.	A/C	16 sec.
Cleveland Avenue S / Selby Avenue ⁽¹⁾	A/A	6 sec.	A/B	12 sec.
Cleveland Avenue S / Summit Avenue	B	13 sec.	B	19 sec.
Cleveland Avenue S / Grand Avenue	B	15 sec.	B	15 sec.
Mississippi River Boulevard / Summit Avenue ⁽¹⁾	A/A	4 sec.	A/A	5 sec.
Mississippi River Boulevard / Goodrich Avenue ⁽²⁾	A	4 sec.	A	4 sec.

- (1) Indicates an unsignalized intersection with side-street stop control, where the overall LOS is shown followed by the worst side-street approach LOS. The delay shown represents the worst side-street approach delay.
 (2) Indicates an unsignalized intersection with all-way stop control, where the overall LOS is shown.
 (3) The eastbound left-turn movement is restricted.

The following information summarizes the operational and/or queuing observations identified as part of the existing capacity analysis:

- **Cretin Avenue/Marshall Avenue:** While the intersection operates at an acceptable overall LOS D, the southbound and eastbound approaches were observed to have 95th percentile queues of 650 feet during the p.m. peak hour. In addition, the westbound approach was observed to have queues of 450 feet or greater during the p.m. peak hour.
- **Summit Avenue at Cretin Ave and Cleveland Ave:** Due to the median width and signal limitations, there is limited storage/capability for side-street left-turn movements to enter the intersections. Of note, the westbound left-turn movement at the Summit Avenue/Cretin Avenue intersection operates at LOS F (77 seconds) with 95th percentile queues of approximately 150 feet during the p.m. peak hour.
- **Cretin Avenue:** Left-turn movements and time-of-day on-street parking were observed to cause abrupt lane changes and friction along the corridor.

Parking

UST Campus Parking/Utilization Counts

A summary of the UST campus parking supply is shown in Figure 3. Note that each lot is generally assigned/restricted to either a resident, commuter, faculty/staff, and/or visitor. The figure highlights in purple the parking locations that are open for event patrons during expected game times and are expected to be utilized for events. In addition, on-street parking locations that are adjacent to campus and do not require a city permit are also highlighted in purple. The project limits are referenced (i.e., dashed orange line) to highlight the surface parking lots that are expected to be removed by the project.

Parking utilization counts were collected on/near the UST Campus in the Spring of 2023 during two (2) different timeframes by two (2) different sources, as summarized below. Note the parking utilization counts were the basis of the non-event and event parking demand analysis, which is discussed later in this document. Detailed parking utilization count information is included in Appendix C.

- 1) UST Parking Counts: Parking utilization counts were collected at all St. Paul campus lots from Monday, February 27, 2023, to Friday, March 3, 2023. The counts were collected in hourly intervals from 12 a.m. to 10 p.m. Monday through Thursday, and 12 a.m. to 6 p.m. on Friday.
- 2) SRF Parking Counts: Parking utilization counts were collected by SRF from Thursday, March 30, 2023, to Saturday, April 1, 2023. The focus of the SRF parking counts was to collect data that was not captured by UST, such as on-street parking adjacent to campus (that do not require a city parking permit) and visitor lots on Friday and Saturday nights (i.e., 6 - 7 p.m.) that are expected to be utilized for events.

While the weather was generally clear during the week of UST parking counts, there was a snowstorm on Friday night (3/31) into Saturday morning (4/1) during the SRF parking counts. However, the storm started after the Friday afternoon counts and the Saturday weather (40 degrees and sunny) generally cleared the roadways by the time of the Saturday afternoon counts, therefore, the parking counts as it relates to event availability are considered representative of typical conditions for the campus area.

Permit Parking Locations

Numerous public neighborhood streets surrounding the UST campus currently have city permit parking restrictions. Given that UST students/staff may currently be parking on the local streets, it is important to understand where/when permit parking is located surrounding the campus. Therefore, a graphic summarizing the residential permit parking locations was developed and is shown in Figure 4. Note the graphic is based on information provided on the City of St. Paul website.

Given the proposed development will be holding events, it is important to monitor parking and the potential surrounding neighborhood impacts. Note various factors may contribute to event traffic parking on local streets, which include but are not limited to, parking supply, proximity to the arena, cost of parking, etc.

Restricted Resident Parking

MRH R3, MRH R2, Lot U

Restricted Commuter and/or Faculty/Staff Parking

Lot A, B, C, D, G, I, K, L, N, O, MRH R1

ASC *

McNeely *

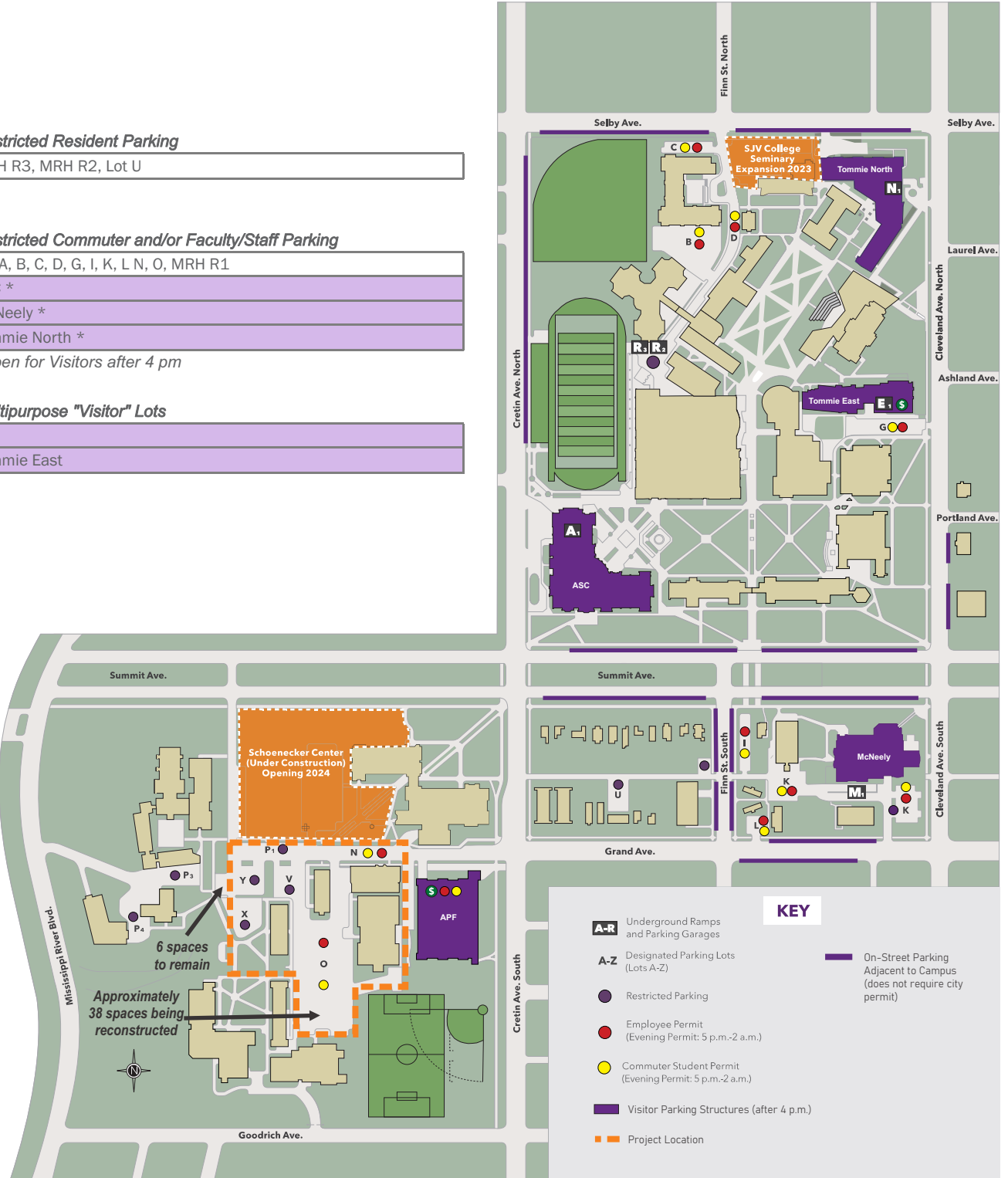
Tommie North *

*Open for Visitors after 4 pm

Multipurpose "Visitor" Lots

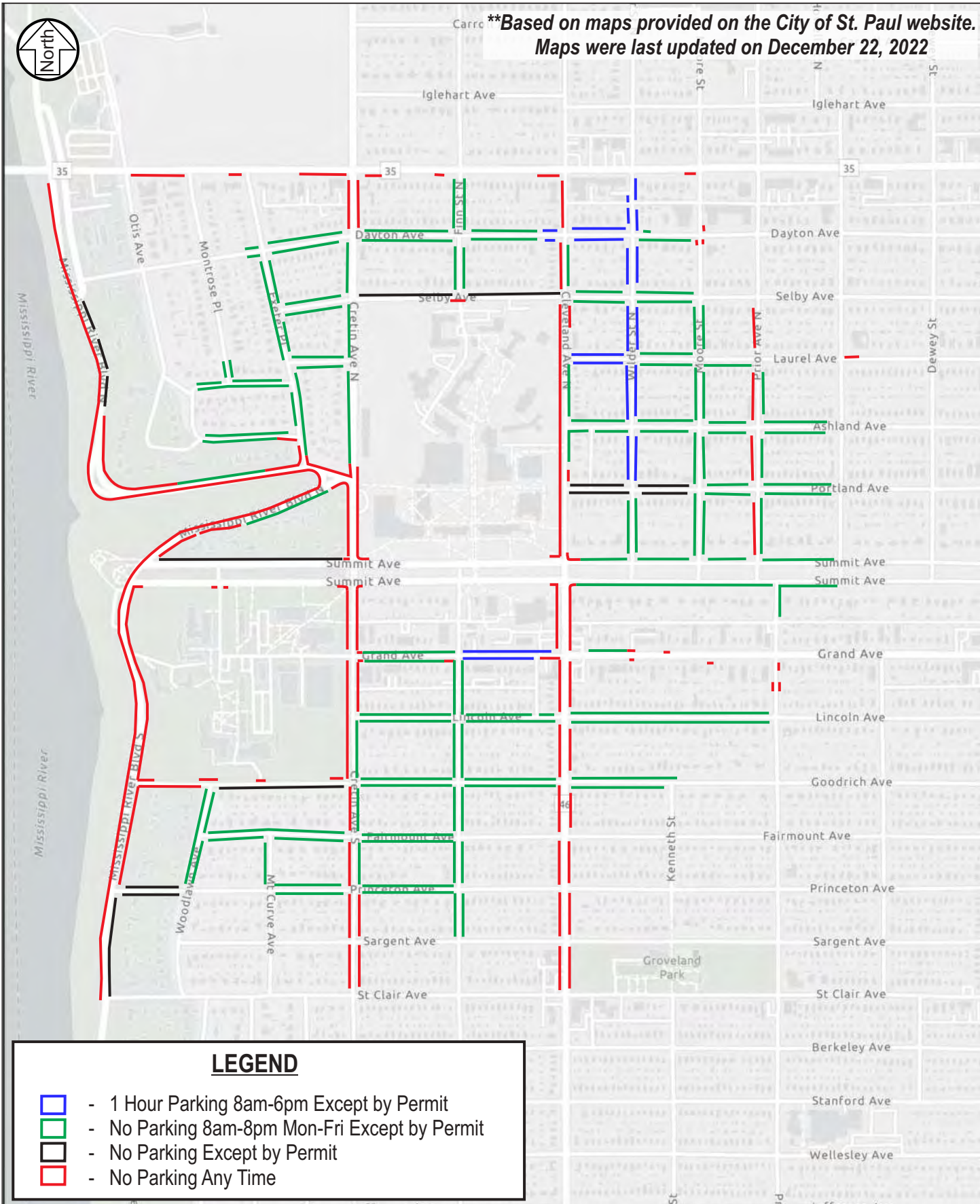
APF

Tommie East



Produced by the University of St. Thomas-Minnesota. Updated July 2022.
 Modified by SRF Consulting in April 2023.





Proposed Development

The proposed multipurpose arena development is located immediately west of the Anderson Parking Facility (APF) in the southwest quadrant of the Cretin Avenue/Grand Avenue intersection. A preliminary site plan for the proposed arena is illustrated in Figure 5, which was used as the basis for this transportation study. As mentioned previously, the multipurpose arena will primarily be utilized by the UST men's and women's hockey and basketball teams. The expected capacity for basketball/hockey events is summarized below, whereas estimated event times, schedules, and attendances are discussed later in this document.

- **Basketball** – 5,500-capacity
- **Hockey** – 4,000-capacity

Other events, such as university commencements, high school/youth sports, and conventions may also be held at the venue. While other event types could have larger capacities (if floor seating is included), due to the infrequency and unknown nature of these other events, the reoccurring hockey/basketball events were the focus of this study. In addition to holding events, the proposed development is also anticipated to include an auxiliary ice rink, separate men's and women's basketball practice facilities, and coaches offices/training facilities.

The proposed arena is expected to begin construction in 2024 and open by Fall of 2025. As part of construction, three buildings are expected to be demolished, which include the Cretin Residence Hall, McCarthy Gymnasium, and a Service Center. In addition, commuter/staff lots (N, O) and School of Divinity (P, V, X, Y) surface parking lots are expected to be removed. Lot O, however, is expected to be reconstructed on the south side of the arena to provide 40 parking spaces, resulting in a total net loss of approximately 265 surface parking spaces.

The project will also result in the discontinuation of the South Campus internal roadway connection from Summit Avenue to Cretin Avenue, and a pedestrian plaza will be provided outside of the arena to enhance pedestrian facilities and safety. Vehicular access will still be provided at both access locations; however, the Summit Avenue access will only provide access to the reconstructed Lot O, and the Cretin Avenue/Grand Avenue access will only provide access to the APF. Vehicle turnarounds are expected to be constructed near both access locations. It should be noted that the Summit Avenue/South Campus intersection is also expected to be modified to better accommodate larger vehicles, as the access is expected to be utilized by team buses and delivery vehicles.

While pedestrian access will be provided at various locations surrounding the building, the primary event entrances are located in the north quadrant, near the proposed plaza area, whereas a secondary access will also be provided on the east side, near the APF. The west side of the APF is expected to be modified to provide a pedestrian entrance/exit. This access modification is expected to serve as a direct connection for APF users and the Arena. It is expected to be utilized by event users, students, staff, as well as potential parent pick-up/drop-off for youth sports. In addition, the arena has a pedestrian access in the south quadrant, that is expected to be utilized by staff, coaches, and media.

2025 Non-Event Conditions

Parking Analysis

The proposed arena development is expected to result in the net loss of approximately 265 parking spaces (308 removed + 38 reconstructed Lot O + 6 Lot Y to remain = 264). Therefore, to identify potential impacts associated with the loss of parking, a parking demand analysis was performed during peak non-event conditions. Note that the peak parking demand on the UST campus is between 11 a.m. and 1 p.m. on a weekday. The peak parking demand of the impacted lots, which is shown in Table 4, indicates that on average 173 vehicles will be displaced as a result of the project.

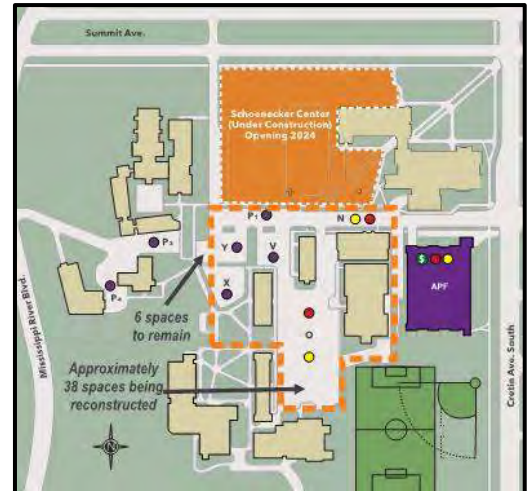


Table 4. Parking Demand of Impacted Lots

Lot ID	Total Parking Spaces	Peak Parking Demand
		Weekday 1:00 pm
<i>Commuter and Staff/Faculty Parking</i>		
N	9	9
O ⁽¹⁾	196	85
Total (N,O)	205	94
<i>School of Divinity (SOD) Parking</i>		
P1 (South)	18	16
V	33	20
X	21	14
Y ⁽²⁾	31	29
Total (SOD)	103	79
Total	308	173

(1) Lot O is expected to be reconstructed and provide approximately 38 spaces.

(2) Six (6) spaces from Lot Y are expected to remain.

To determine if alternative campus parking sources can accommodate the displaced parking, the available parking supply on campus was reviewed. The review was focused on other non-resident parking lots and on-street parking (no permit required) adjacent to campus. Based on the parking utilization data, which is summarized in Table 5, approximately 259 parking spaces are available on average during the UST peak parking demand. Note that approximately 44 spaces are expected to be reconstructed or remain (Lot O and Lot Y) that were included in the available parking supply. In addition, Lot A (56 unrestricted spaces) is currently closed for construction and could provide additional parking spaces.

Table 5. Available Parking Supply

Lot ID	Total Unrestricted Parking Spaces ⁽²⁾	Available Parking Supply
		Peak Weekday 1:00 pm
APF	691	78
ASC ⁽¹⁾	118	24
McNeely ⁽¹⁾	104	53
Tommie North ⁽¹⁾	112	25
Other Commuter/Staff Lots (A, B, C, D, G I, K, L)	248	0
On-Street (Adjacent)	369	35
Lot O and Lot Y ⁽³⁾	44	44
Total	1,686	259

- (1) Parking structure restricted during the day for contract faculty/staff parking only.
- (2) Restricted parking spaces include, but are not limited to, Electric Vehicle, 15-minute parking, faculty vehicles, etc. that were not included in the general parking supply.
- (3) Lot O is expected to be reconstructed and provide approximately 38 spaces. Six (6) spaces from Lot Y are expected to remain.

Table 6. Parking Demand Analysis

Available Supply	Relocated Parking	Surplus Parking
259	173	86

Results of the parking demand analysis, which is summarized in Table 6, indicate that the alternative parking supply sources can accommodate the increased parking demand associated with the impacted lots. While a surplus is expected, the following parking operations should be considered:

- The APF and Lot O/Y are expected to be full between 11 a.m. and 1 p.m. on a daily basis. Given the displaced vehicles likely have a desire to be on the south campus, these lots are expected to be fully utilized before using other alternative parking sources.
 - Note it is generally good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional five (5) to 15 percent. This extra supply reduces the unnecessary circulation of vehicles looking for parking and the perception of inadequate parking.
- The ASC, McNeely, and Tommie North parking structures are all restricted during the day for contract faculty/staff only. Note the impacted lots consist of a combination of commuter, faculty/staff, and School of Divinity (SOD) users, therefore, may not be a direct comparison.
- On-street parking may be difficult to find and/or not in a desirable area for south campus users.

It should be noted that UST has implemented strategies in the past to help decrease parking demand:

- In Fall of 2021, UST implemented a new policy requiring full-time, undergraduate, first and second-year students to live on campus. In Fall of 2022, there were over 2,600 students living on campus, and only 795 resident parking permits were issued. Therefore, a majority of students living on campus do not have vehicles on campus.
- UST subsidizes the cost of a Metro Transit bus pass, making them less expensive for students, faculty, and staff. Student Metro Transit College Passes (C-Pass), Faculty/Staff Metropass, and stored value cards/10-ride passes can all be purchased through the University. For reference, 700 C-Passes were purchased in the 2022-2023 calendar year.

Additional strategies to help decrease parking demand are summarized below. Constructing additional parking on campus could also be considered and is discussed later in this document.

- Issue less commuter, faculty/staff, or SOD parking permits to ensure there is adequate parking capacity within the APF for visitor parking.
- Reduce the number of student resident parking permits and discontinue resident parking in the APF (note approximately 100 resident permitted vehicles utilize the APF).
- Continue to inform and educate students of the discounted bus passes and metro transit routes/schedules. Consider providing each student with a 10-ride pass at the start of the year, to help students to familiarize themselves and/or try transit. Consider reducing C-pass/Metropass costs (increasing subsidization), particularly if students/staff purchase multiple semester passes.
- Consider expanding the UST Campus Shuttle Service to provide stops at known or desirable off-campus living locations. The shuttle expansion could be accomplished by conducting a survey to determine where off-campus students are living and whether they would utilize the service. In addition to serving the St. Paul campus students, the expansion could also capture students who are utilizing the St. Paul campus as a “park-and-ride” to get to the Minneapolis campus.
 - Note off-site parking lots could be investigated to provide shuttle services to/from.
- Issue more Minneapolis Harmon Ramp permits and/or review potential strategies to increase student/staff parking at the Minneapolis campus. These strategies would be designated towards students/staff that are traveling to/from the west metro and/or have a majority of their curriculum at the Minneapolis campus.
 - Note one potential strategy is shifting staff members to the Minneapolis campus.
- Ensure there are adequate indoor and outdoor bicycle parking spaces and facilities on campus.

Event Background/Assumptions

Various event-related assumptions were developed through discussions with UST and the City of St. Paul throughout the study process. These assumptions lay the framework for the event conditions analysis, to help identify problem areas and potential mitigation. The following event background/assumptions are summarized in the following sections.

UST Current Events

As mentioned previously, the proposed multipurpose arena is a state-of-the-art facility that will host men's and women's hockey and basketball events, as well as other events. Currently, UST hosts several events on the St. Paul campus, which are summarized below for reference:

- Men's football games are currently played at O'Shaughnessy Stadium, which is located in the north campus and has a seating capacity of approximately 5,000, but often has attendances that range from 4,000 to 6,500.
- Men's/women's basketball and women's volleyball games are currently played at Schoenecker Arena, which has a seating capacity of approximately 2,000 event patrons.
- Men's/women's soccer and women's softball games are currently played at the South Athletic Fields, just south of the APF. Seating capacities of the South Athletic Fields range from 150 to 800.
- Men's baseball games are currently played at Koch Diamond in the North Campus, which has a seating capacity of 250.
- Commencements, conventions, career fairs, etc. are often hosted on the North Campus.

Event Schedule/Times

Regular season event schedules and times were estimated based on a combination of the current UST sports schedules, as well as numerous similar programs, including two (2) programs with multipurpose (hockey/basketball) arenas. The estimated event schedule for the multipurpose arena is shown in Figure 6 and Table 7. Note that men's and women's basketball games are highlighted in gray since they are currently played on-campus, whereas men's and women's hockey games were highlighted in purple to represent "new" games/events expected on campus.

Figure 6. Estimated Event Schedule

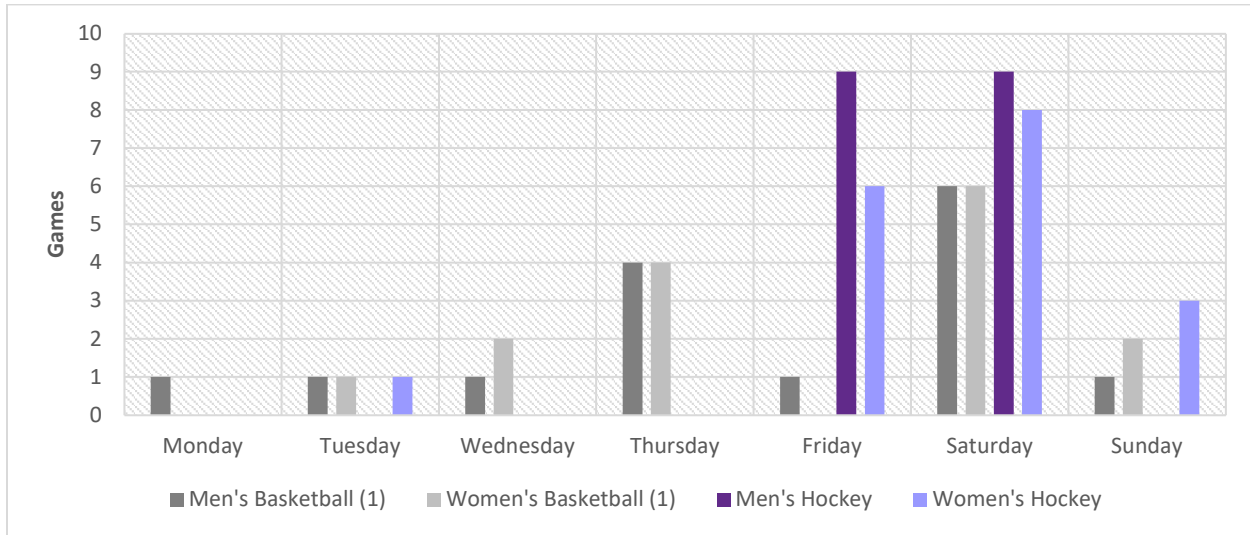


Table 7. Estimated Event Schedule

Event	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Total
Men's Basketball ⁽¹⁾	1	1	1	4	1	6	1	15
Women's Basketball ⁽¹⁾	0	1	2	4	0	6	2	15
Men's Hockey	0	0	0	0	9	9	0	18
Women's Hockey	0	1	0	0	6	8	3	18
Total	1	3	3	8	16	29	6	66

(1) Note men's and women's basketball games are currently played on-campus.

While event times can vary, based on the comparison of UST and similar multipurpose arena programs, they generally follow a pattern as shown in Table 8. Men's hockey generally plays at 7:07 p.m. on Fridays and 6:07 p.m. on Saturdays, men's basketball generally plays at 7:00 p.m. regardless of the night, and women's basketball/hockey event times can often vary, generally playing at 6 or 7 p.m. on weeknights, and in the afternoon on weekends. Note that men's hockey/basketball may have day games sporadically throughout the season, either on a weekend or holiday. If a men's and women's game are scheduled on the same day, the women's game is generally shifted to earlier in the day. On average, hockey and basketball games were assumed to last approximately two (2) hours.

Table 8. Event Time Assumptions

Men's Hockey	Men's Basketball	Women's Hockey	Women's Basketball
<ul style="list-style-type: none"> Fri – 7:07 pm Sat – 6:07 pm ⁽¹⁾ 	<ul style="list-style-type: none"> All days – 7:00 pm ⁽¹⁾ 	<ul style="list-style-type: none"> Fri – 6:00 or 7:00 pm ⁽²⁾ Sat/Sun – 1:00 or 2:00 PM 	<ul style="list-style-type: none"> Mon – Fri – 6:00 or 7:00 pm ⁽²⁾ Sat/Sun – 1:00 or 2:00 PM

(1) May have day games sporadically throughout season, either on a weekend or holiday

(2) If a game is scheduled on the same day as a men's game, the women's game is generally shifted to earlier in the day.

Event Attendances

Attendance data was collected for numerous similar programs during the 2022-2023 regular season to help estimate the event attendances expected at the new arena. Similar programs mostly consisted of teams that are currently in UST's conference (i.e., CCHA, WCHA, Summit League), excluding both the top and bottom capacity men's programs to eliminate outliers. The attendance data is shown in Figure 7, and stadium capacities of the similar programs are summarized in Appendix D. Note the UST attendance was included in the graphic for reference, however, was not included in the similar program average attendance, given UST's current facilities are not able to accommodate larger attendances and their recent transition to Division-1 sports. Key takeaways include:

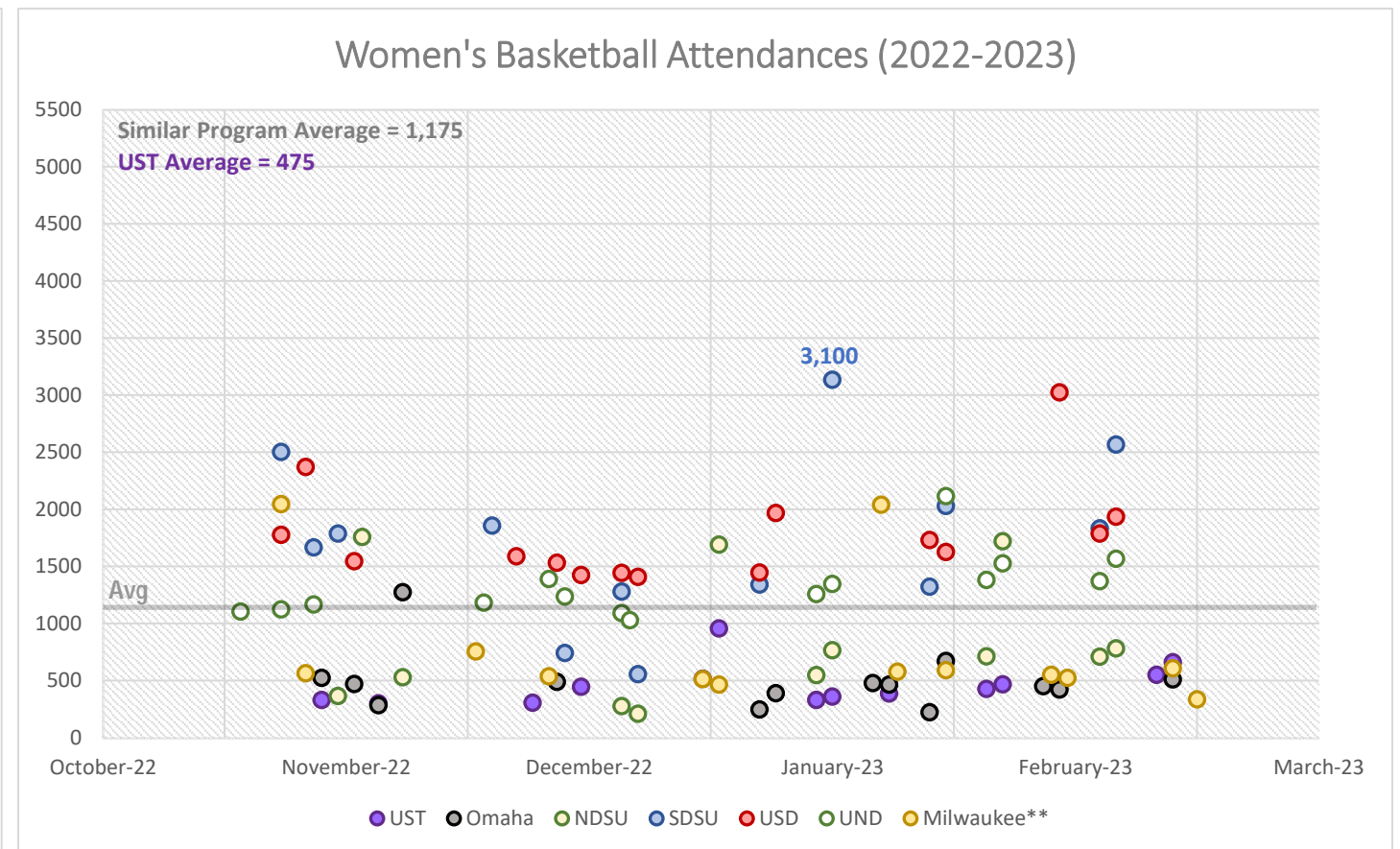
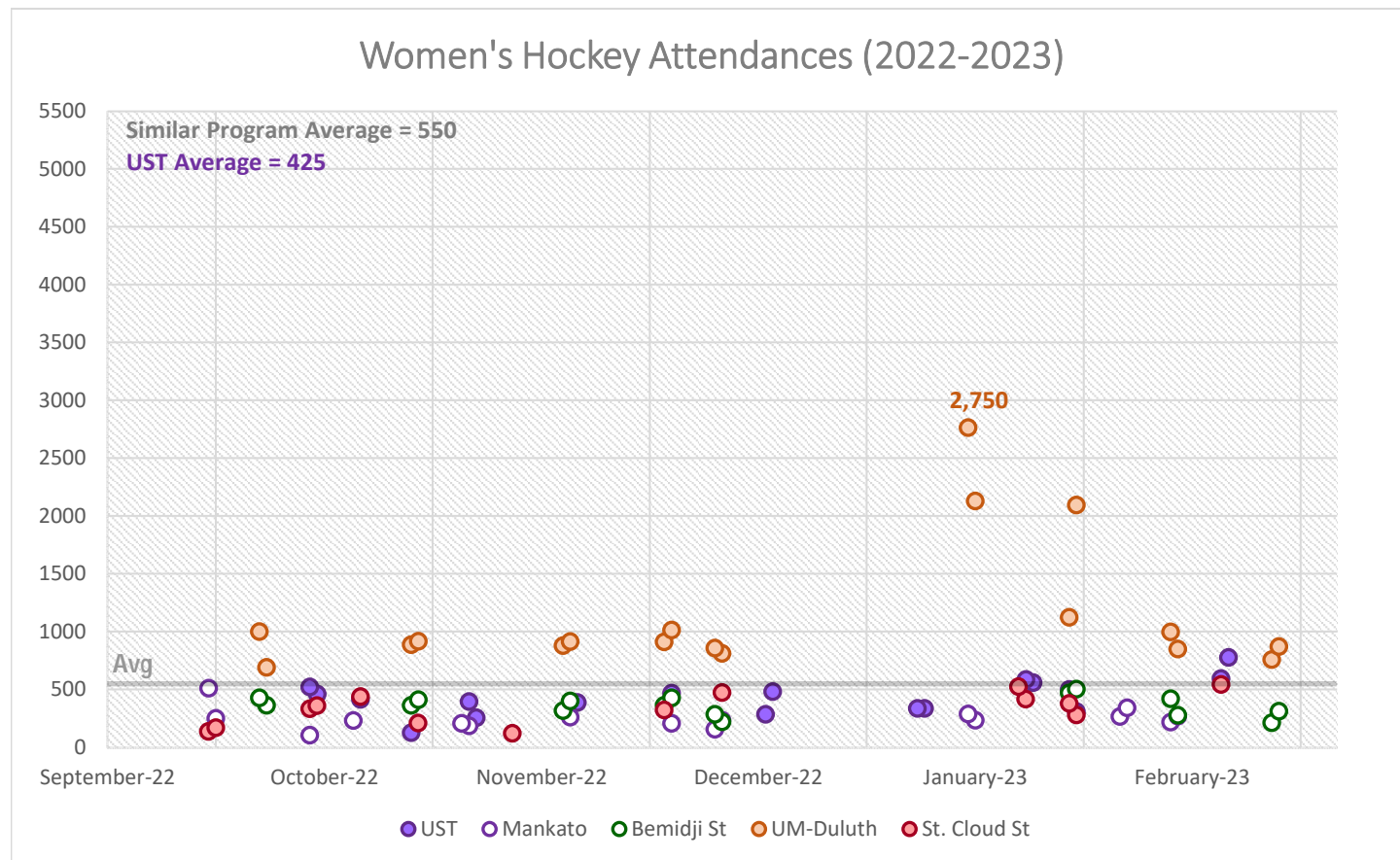
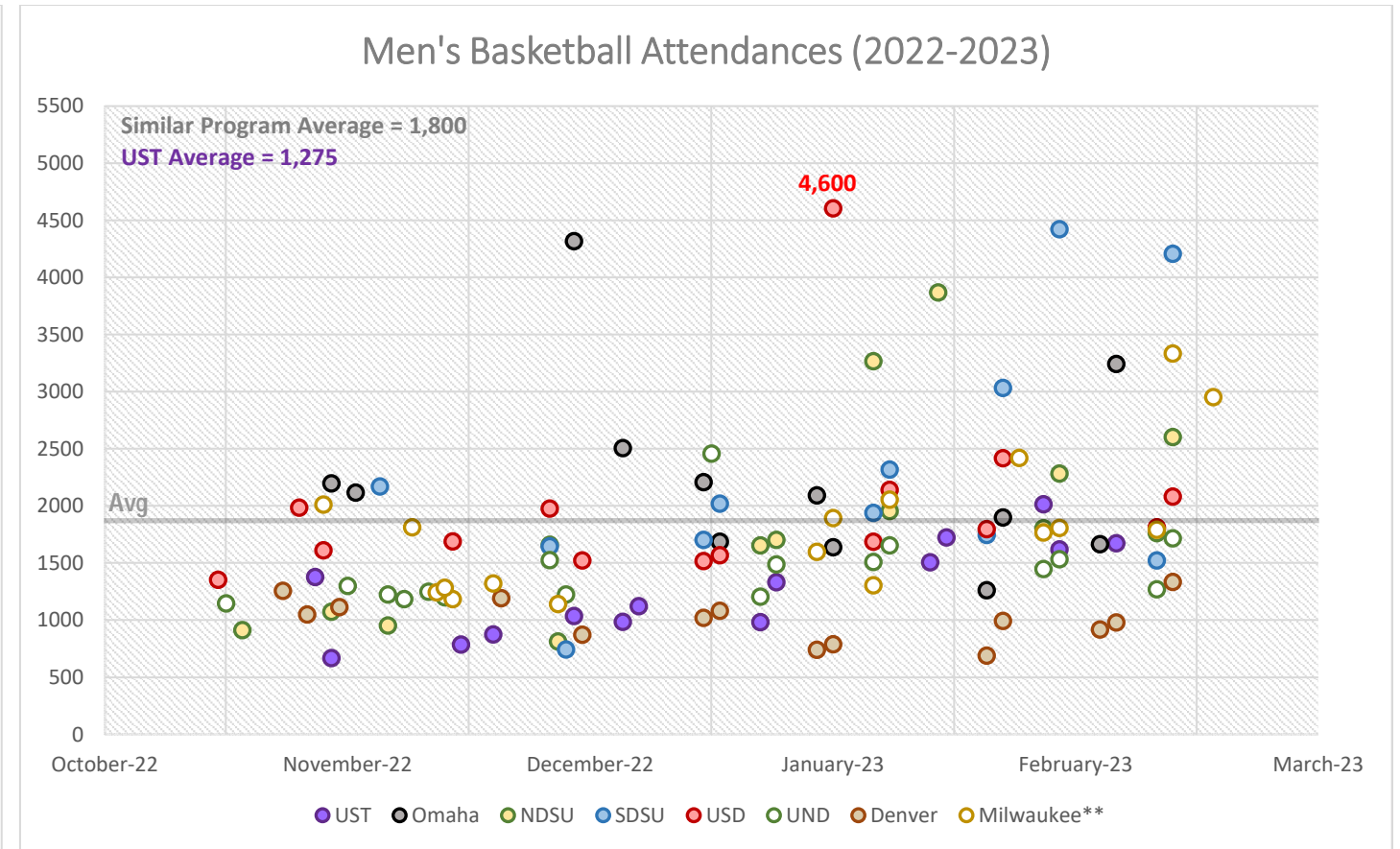
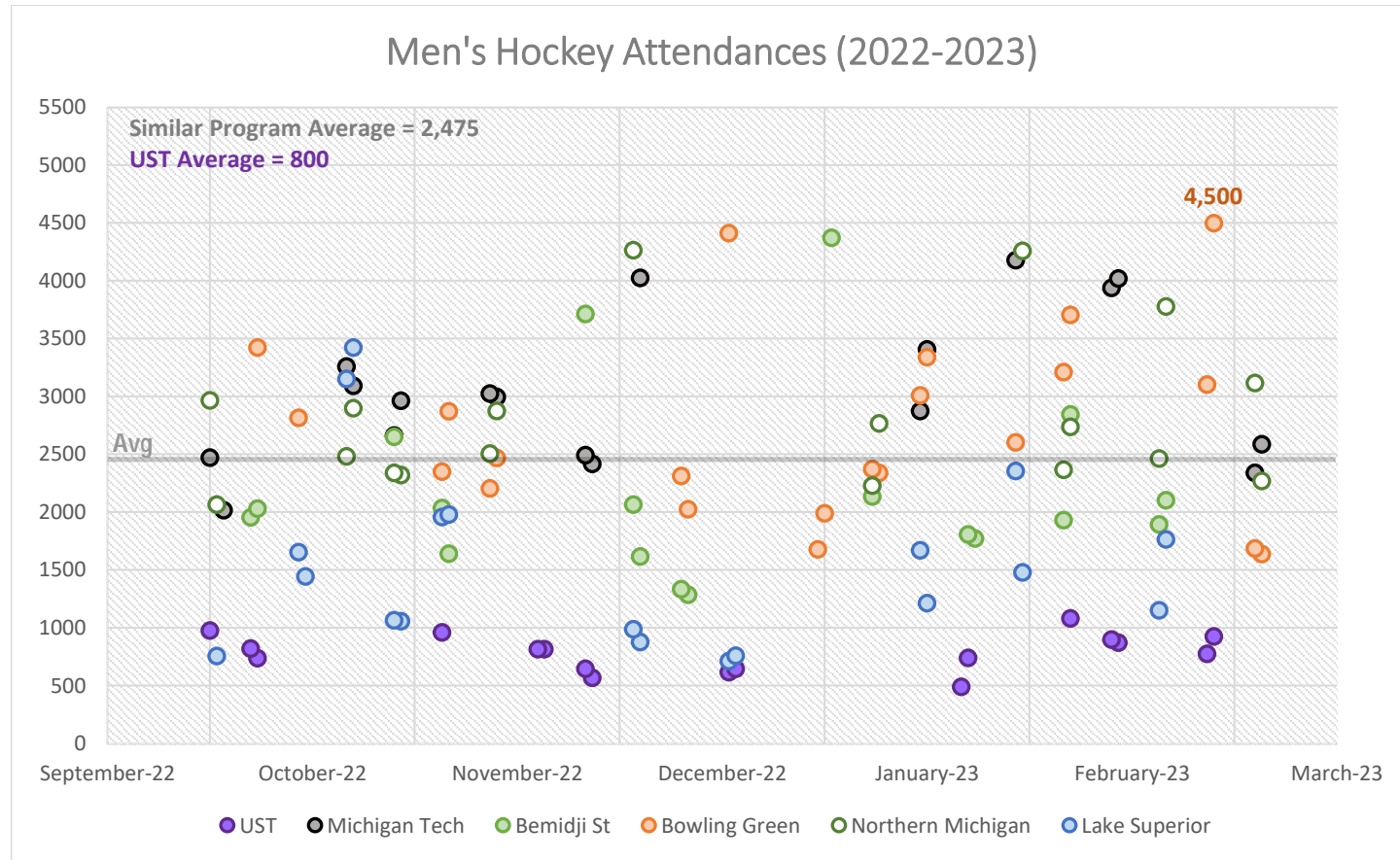
- Men's basketball programs generally have one (1) to two (2) higher attendance games per year.
 - Higher attendance games were generally rivalry games or games later in the season.
 - Note the highest attendance for similar programs was 4,600.
 - Average attendance was 1,800.
- Men's hockey programs generally have two (2) to four (4) higher attendance games per year.
 - Note the highest attendance for similar programs was 4,500.
 - Average attendance was 2,475.
- Women's hockey/basketball programs generally have a maximum attendance of around 3,000.
 - Average attendance ranges from 550 to 1,175.

Analysis Scenarios

To provide a conservative estimate, the following event scenarios were the focus of the transportation study analysis:

- **Max Capacity (5,500) Basketball Game on a Weeknight**
 - Represents the worst-case from an attendance, parking, and traffic perspective. May only be observed once or twice a year, if at all.
- **Typical Event (3,000) on a Friday Night**
 - Represents a conservative "average" attendance for men's sports and a maximum attendance for women's sports. Friday represents a frequent night for hockey events but is also worse than Saturday from a parking and traffic perspective.

Figure 7 - Attendances at Similiar Programs



** - Not in the Summit League

Event Characteristics

As previously discussed, events are generally expected to occur from 7:00 p.m. to 9 p.m., therefore the pre-event peak hour is assumed to be the hour prior to the game time (6:00 to 7:00 p.m.) and the post-event peak hour is assumed to be the hour immediately following the end of the game (9 to 10 p.m.). It is assumed that not 100 percent of the event traffic is expected to arrive or depart the arena during the one-hour analysis period. Table 9 shows the assumed percent of vehicles arriving/departing during the analysis hour for an event. Note that 10 to 20 percent of the stadium seating will be “premium” seating, which is expected to provide pre-game dinner and drinks. In addition to the premium seating, some event patrons may arrive to the game late. For post-event conditions, five (5) percent of event patrons were assumed to leave early or be family/friends waiting for athletes after the game.

Table 9. Event Traffic During Peak Analysis Hour

Scenario	Weekday
Arrival	90 %
Departure	95 %

Peaks are expected to occur for vehicular and pedestrian traffic within the arrival and departure peak hours. It is anticipated that the arrival peak will be more spread out over the course of about 30 to 45 minutes, whereas the departure peak typically occurs within a 15-to-20-minute interval after the event. In general, pedestrian and vehicular peaks occur at the same time. However, some of the UST parking lots may be a 5 to 10-minute walk from the arena. Therefore, the staggered vehicular/pedestrian peaks associated with the anticipated 5 to 10-minute walk were accounted for during post-event analysis.

Auto-Occupancy

Based on a combination of data collected at multiple events at Allianz Soccer Stadium, local event studies, numerous technical resources, and event travel characteristics around the Twin Cities and the country, an estimate of 2.75 event patrons per vehicle was assumed for average auto occupancy.

Modal Split Assumptions

Modal split assumptions were developed for two demographics: students and non-students. The breakdown between students and non-students was based on the number of student section seats that are currently proposed for the arena (approximately 1,200 for basketball). Student modal split distributions were developed based on the number of students that live within 3/4-mile of the arena and the number of transit passes owned. Non-student distributions were based on historical basketball ticket information and general event characteristics around the Twins Cities Metropolitan Area. These assumptions were discussed and reviewed by UST and the City of St. Paul throughout the study process. A summary of the modal split assumptions and the resultant person trips is shown in Table 10.

Table 10. Max Capacity (5,500 Attendees) Event Modal Split Assumptions

Transportation Modes for Students/Non-Students	Percent by Mode	Person Trips
		5500
Students	22%	1200
Non-Students	78%	4300
Student Modal Split Assumptions		1200
Passenger Vehicle Trips	10%	120
Rideshare (Uber/Lyft/Taxi, etc.)	10%	120
Transit/Shuttle (Local Bus)	5%	60
Walk/Bike	75%	900
Non-Student Modal Split Assumptions		4300
Passenger Vehicle Trips	88%	3784
Rideshare (Uber/Lyft/Taxi, etc.)	5%	215
Transit/Shuttle (Local Bus)	2%	86
Walk/Bike	5%	215

Trip Generation

Using the assumptions outlined in this section, pre-event and post-event peak hour trip generation estimates were developed for a maximum capacity event and shown in Table 11. The trips generated were distributed to the study area based on the directional distribution shown in Figure 8, which was based on hockey/basketball season ticket zip code information, existing travel patterns, and engineering judgement.

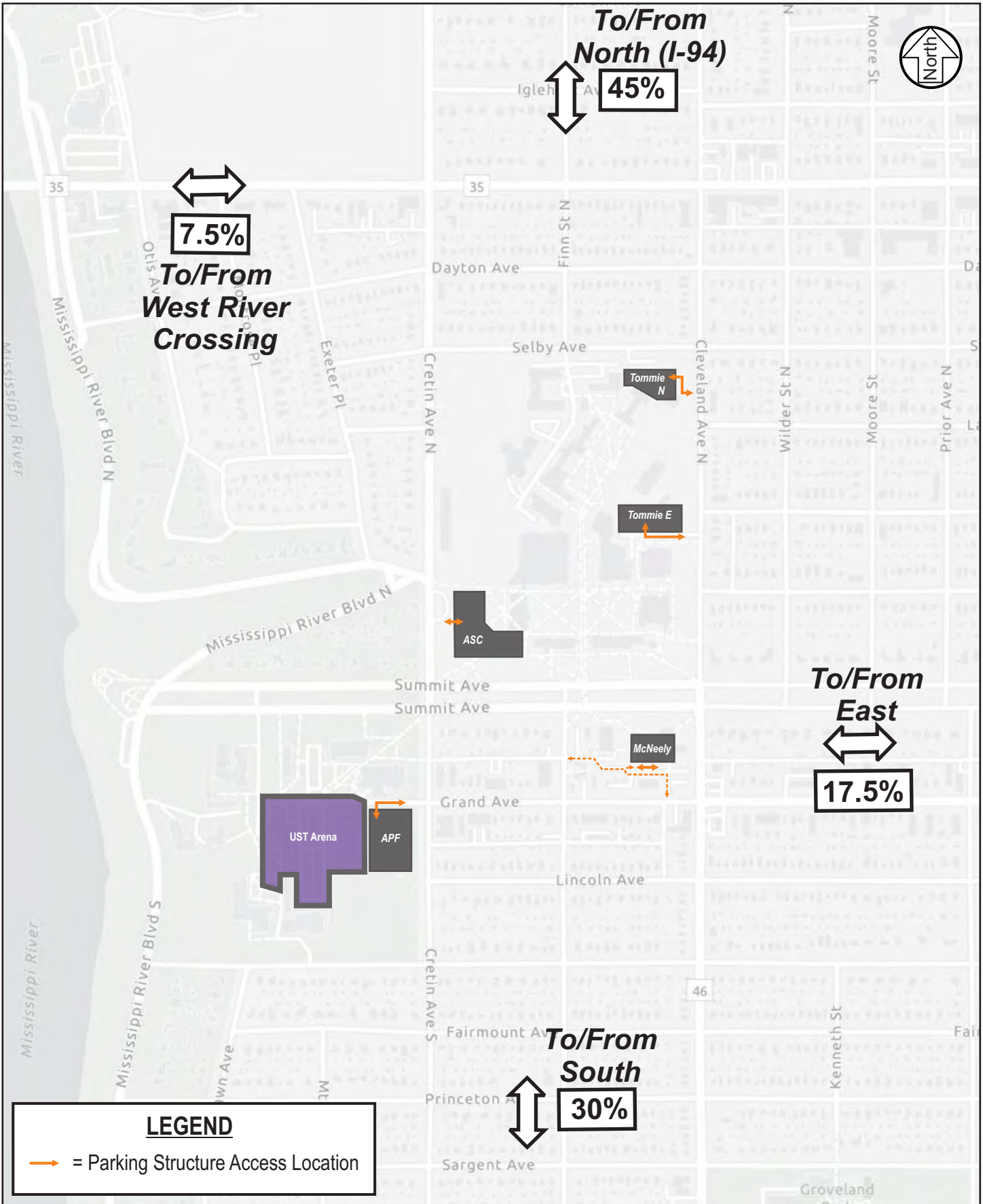
Table 11. Trip Generation Estimate (Maximum Capacity Event – 5,500 Attendance)

Vehicle Type	Vehicle Trips			
	Pre-Event Peak Hour		Post-Event Peak Hour	
	In	Out	In	Out
On-Site Parking	1,278	0 ⁽¹⁾	0 ⁽¹⁾	1,349
Rideshare (Uber/Lyft/Taxi)	110	110	116	116
Total Site Trips	1,388	110	116	1,465

(1) While there may be some on-site parking vehicles exiting during pre-event or entering during post-event, these volumes are assumed to be negligible.

Pedestrian Volumes

To determine heavy pedestrian crossing and vehicular/pedestrian conflict locations, the pedestrian volumes were routed throughout the study area based on both on-campus and off-campus parking locations, as well as other multimodal routes/locations such as transit stops, potential rideshare locations, and student/non-student walking distributions. The pedestrian volumes are shown in Appendix D.



2025 Event Conditions

Event conditions were evaluated to understand any transportation issues and potential mitigation strategies associated with a maximum capacity event. The event conditions evaluation includes a parking demand analysis, operations analysis, and event mitigation strategies/proposed event routing.

Parking Demand Analysis (Issue Identification with No Mitigation)

Figures 3 and 4 were combined to create an overall event parking supply graphic, which is illustrated in Figure 9. Similar to Figure 3, the graphic highlights in purple the UST campus parking areas (either visitor parking structures or on-street parking adjacent to campus) that are expected to be utilized for events. A 1/2-mile is generally considered walking distance for the general public, therefore, a 1/2-mile radius from the arena was included in the graphic. City permit parking locations are shaded in gray, to help visualize the distance/locations event patrons may seek public on-street parking.

The available parking supply for each of the event parking locations is summarized in Table 12. The available parking supply is based on the parking utilization surveys completed by UST/SRF, but also accounts for the parking loss caused by the arena footprint. The parking utilization surveys were completed from 6 to 7 p.m., which is when event traffic is expected to arrive. As shown in Table 12, parking is much more available on the weekend than during the week.

Table 12. Available Parking Supply Before Events

Lot ID	Total Unrestricted Parking Spaces	Available Parking Supply ⁽¹⁾		
		Thursday/Weeknight 6:00 pm	Friday 6:00 pm	Saturday 6:00 pm
APF	691	302	526	569
ASC	118	96	100	108
McNeely	104	86	96	96
Tommie East	59	50	48	44
Tommie North	112	60	61	59
On-Street (Adjacent)	369	84	185	214
Total	1453	678	1016	1090

(1) Includes parking supply adjustments to account for parking loss caused by the arena footprint.

Using the modal split assumptions outlined in the Event Background/Assumptions section, an event parking demand analysis was completed and is shown in Table 13. The estimated parking demand for a maximum (5,500) basketball, maximum (4,000) hockey, and typical (3,000) event are estimated to be approximately 1,420, 1,050, and 775 vehicles, respectively.

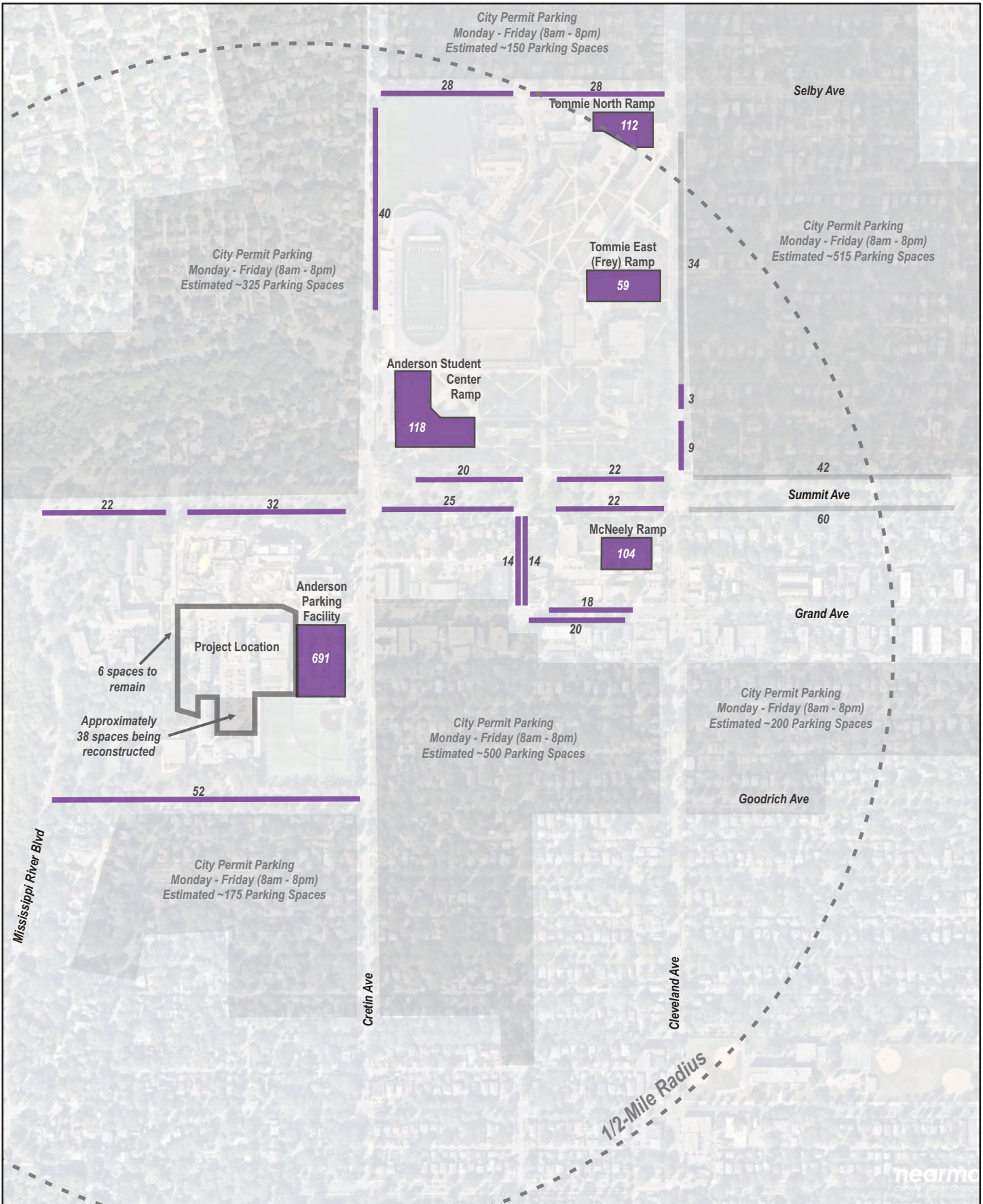


Table 13. Event Parking Demand Analysis

	Total Number of Games ⁽¹⁾	Estimated Frequency	Available Supply	Demand ⁽²⁾	Deficit/Surplus
Thursday/Weeknight Night Event					
Max Basketball (5,500)	4 to 7 BBall	0 - 1	678	1420	-742
Typical (3,000)	No Hockey	6		773	-95
Friday Night Event					
Max Basketball (5,500)	1 BBall 9 Hockey	0	1016	1420	-404
Max Hockey (4,000)		2		1053	-37
Typical (3,000)		8		773	243
Saturday Night Event					
Max Basketball (5,500)	6 BBall 9 Hockey	0 - 1	1090 ⁽³⁾	1420	-330
Max Hockey (4,000)		2		1053	37
Typical (3,000)		13		773	317

(1) Based on expected men’s hockey and basketball schedules.

(2) UST players/coaches and event staff are expected to park in the reconstructed lot O or other commuter and faculty/staff lots.

(3) Note nearby city permit parking restrictions are generally not in effect on Saturday.

Key takeaways from the event parking demand analysis are as follows:

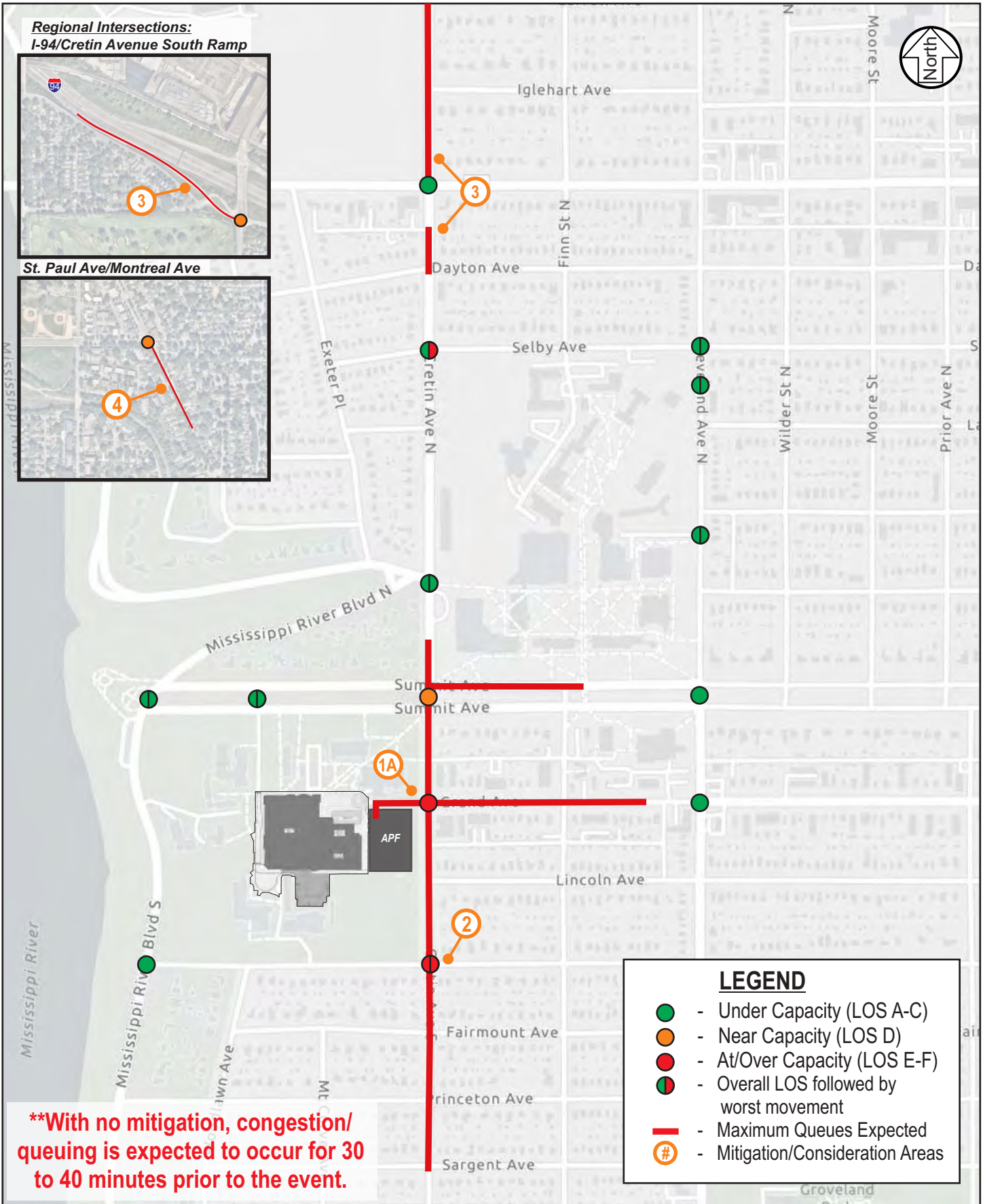
- Maximum basketball events are expected to have a deficit of approximately 330 to 740 spaces. These vehicles will likely utilize public parking in the neighborhood.
 - Based on similar programs, maximum basketball events may only occur one (1) or two (2) times a year, if at all.
- Maximum hockey events are generally expected to be accommodated on campus. However, some vehicles may choose to park on public streets in the neighborhoods over parking in the northeast quadrant of the north campus, especially on Saturdays when city permit parking restrictions are lifted.
 - Based on similar programs, maximum hockey events are only expected to occur two (2) to four (4) times a year.
- Typical or “average” attendance events are expected to have a parking deficit of approximately 100 spaces on a weeknight and a parking surplus of approximately 240 to 320 spaces on the weekends. For typical events on weekends, event patrons will likely be able to park at either the APF, ASC, or McNeely ramps, or on-street parking near the arena. These are all desirable locations and will likely be utilized over public streets, particularly on Friday nights when city permit parking restrictions are in effect.
 - Typical events represent the majority of men’s sporting events and the maximum women’s sporting events.
 - Note the typical attendance was a conservative estimate compared to other similar program averages.

Operations Analysis (Issue Identification with No Mitigation)

An operations analysis was conducted for both pre-event and post-event conditions during a maximum capacity weeknight event (i.e., basketball game), to determine the potential transportation impacts associated with the increased pedestrian and vehicular traffic. Note that a maximum capacity weeknight event is considered a worst-case scenario based on a combination of less available parking and higher background traffic when compared to a weekend. The operations analysis was completed using Synchro/SimTraffic software and assumed no mitigation besides the following base assumptions:

- Year 2025 no build volumes were utilized as background traffic. Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development.
- Prepaid entry to the APF parking facility. Parking tickets are either expected to be checked by a parking consultant or inserted into a machine upon entry.
- For a worse-case traffic operations analysis, all event traffic was routed to the UST campus parking facilities or on-street parking locations adjacent to campus. Assuming parking further away from the campus would reduce potential traffic impacts.
- Event patrons generally know where they plan to park prior to the event and there is minimal circulation looking for parking spaces.
- On-street parking is assumed to be present along Cretin Avenue (as parking restrictions are generally lifted after 6 pm). Therefore, Cretin Avenue was modeled to have one lane of travel at the on-street parking locations.

An illustrative summary of the pre-event and post-event operations is shown in Figures 10 and 11, respectively, with traffic volumes and a summary table of results in Appendix D. Based on the operations analysis, the following issue/consideration areas were identified. The following paragraphs correspond to the numbers shown on the graphics.





Max Capacity - Post-Event Operations (No Mitigation)
 UST Multipurpose Arena EAW Transportation Study
 City of St. Paul

Figure 11

1A) APF Entrance and High Pedestrian Conflicts (No Mitigation)

- Approximately 800 to 1,200 pedestrians are expected to cross the vehicular entrance to the APF and the Cretin Avenue/Grand Avenue intersection.

Pre-Event:

- As mentioned previously, a service time (i.e., checking/inserting parking tickets) is expected for event patrons entering the APF ramp and most event patrons are expected to arrive within a 30-minute window prior to the start of the game. In addition, there is limited vehicular storage (approximately 200 feet or 10 vehicles) between the APF entrance and the Cretin Avenue/Grand Avenue intersection.
- The heavy pedestrian conflicts combined with the limited vehicle storage are expected to result in queues extending onto Cretin Avenue and extending into other adjacent intersections. Event patrons will have difficulty entering the site during the peak 15-minute window prior to the game starting, and the queues on Cretin Avenue will block non-event through traffic.

Post-Event:

- No protective signal phases are provided for the eastbound approach of the Cretin Avenue/Grand Avenue intersection. Pedestrians will be condensed during post-event conditions, which will make it difficult for eastbound left- or right-turn vehicles to find gaps until the majority of pedestrians have cleared the site.
- These pedestrian conflicts will delay the ability to clear the APF parking ramp. With no mitigation, it is expected to take approximately 45 minutes to one (1) hour to clear the ramp when at capacity.

1B) Cretin Avenue/Summit Avenue (No Mitigation)

- Approximately 2,000 pedestrians are expected to cross through the approaches of the Cretin Avenue and Summit Avenue intersection during pre- and post-event conditions. For reference, approximately 750 to 1,200 pedestrians cross through the intersection during each non-event a.m., midday, and p.m. peak hours. However, a majority of these crossings occur within a peak 15-minute window during class changeovers.
- Pre-event conditions will likely operate similar to non-event peak hours at the intersection. During post-event conditions, pedestrians will likely be more condensed, and it will likely be dark outside.

2) Pedestrian Crossing at Cretin Avenue/Goodrich Avenue

- There is currently a pedestrian crossing on the south side of the Cretin Avenue/Goodrich Avenue intersection. While most pedestrians are expected to cross Cretin Avenue at the signalized intersections of Summit Avenue and/or Grand Avenue, Goodrich Avenue may be a desirable crossing location for event patrons coming to/from the southeast.

- The number of pedestrian crossings at this location will be heavily dependent on where event patrons are parking.

3) Entering Volumes from I-94 (No Mitigation)

- Approximately 45 percent of event traffic is expected to be coming from I-94. These volumes result in eastbound right-turn queues at the I-94/South Ramp intersection extending to a maximum distance of approximately 1,800 feet. Congestion will continue to occur along the corridor at the Marshall Avenue intersection, as well as after the intersection when on-street parking is expected to be present.
- While the eastbound right-turn queues are expected to take up most of the off-ramp storage, the “rolling” queues are not expected to extend onto I-94 and are only expected to last for approximately 15 to 20 minutes prior to the game.

4) St. Paul Avenue/Montreal Avenue

- During pre-event conditions, northbound queues at the St. Paul Avenue/Montreal Avenue intersection are expected to extend a maximum distance of approximately 700 feet. Similar to the I-94/South Ramp intersection, queues are only expected to last approximately 15 minutes prior to the game.
- Note on-street bicycle lanes were recently implemented along St. Paul Avenue, which resulted in the removal of vehicular travel lanes in each direction. The *Highland Bridge AUAR Update* recommended traffic control improvements at the intersection that would reduce the queueing impacts.

Mitigation Strategies

Parking

The event parking demand analysis identified that UST may have a parking deficit ranging from 40 to 740 vehicles, depending on the event size and night of the week. While the larger parking deficits (over 100 vehicles) are only expected to occur once or twice a year, it is important to understand that when parking on campus become full, inconvenient, or costly, event patrons will begin to park in the public parking spaces in the neighborhood. Therefore, the following mitigation strategies and improvements were identified to help reduce on-street public parking in the neighborhoods during events.

Potential Strategies

Restrict Campus Parking Areas for Event Parking

- Time-of-day restrictions and/or “no park” days/nights could be implemented for the APF and other campus lots. Clearing/restricting the APF could provide an additional 120 to 165 parking spaces on the weekend and as many as 390 spaces on a weeknight. While the APF would be the most effective lot, restricting other parking structures and lots could be considered as well.
- To reduce essentially “shifting” student/staff parking to the public streets, early communication/notification would need to be provided prior to enforcing the event parking restrictions in UST facilities. Online classes/telecommuting may also need to be implemented simultaneously to ensure the strategy is effective.

Require Pre-Paid Event Parking Tickets (Mobile) for All Visitor Lots

- Assigning parking would ensure that event patrons know their destination prior to the event, which could eliminate any potential frustration/circulation looking for a parking space.
- While hardcopy parking tickets/passes could be distributed, most event venues currently utilize digital tickets through mobile applications. Note mobile parking applications pair well with mobile ticketing apps and could help keep all event related information completely mobile.
- Parking applications could inform event patrons what lots are sold out/full for each event. If event patrons are aware that all lots are sold out in advance, they may be more inclined to utilize transit/rideshare or carpool rather than deal with the hassle of looking for parking and/or walking further distances.
 - Note mobile parking applications could also provide transit options (bus routes and links to buy a pass) or a potential shuttle pass for larger attendance games (if implemented - see potential improvements section).
- Note parking management systems/applications could potentially be utilized by students/staff on a daily basis. Parking application capabilities and logistics would need to be further evaluated.

Schedule Higher Attendance Games on Weekends

- There may be scheduling flexibility for non-conference games, to help limit higher attendance games on weeknights, when there is less available parking on campus.

Provide Transit Incentives with the Purchase of a Ticket

- Incentives such as discounted or free bus passes could be considered.

Utilize Restricted Commuter and Faculty/Staff Parking Lots

- Strategy would likely require updated lot signage, communication, and parking operations.

Formal Partnership with a Rideshare Company

- A formal partnership with a rideshare company could be pursued to offer reduced pricing for event ticket holders.

Communicate Bicycle Parking Locations on the University Website

- Note internal bicycle parking spaces are provided within the southwest quadrant of the APF.

Provide Overflow Parking on the South Athletic Fields

- Overflow parking could be considered on the South Athletic Fields. Note this would only be able to be provided when soccer and softball seasons are not in session. Given that vehicular access to the fields would likely be provided via the reconstructed Lot O and backside of the building, the overflow parking would likely be designated for coaches, players, and event staff only. Field preservation and snow removal would need to be further evaluated.

Study Area After Constructed

- As mentioned previously, attendances can and will vary for the new multipurpose arena. Note that various assumptions within this document are considered conservative, and some of the larger event attendances and associated parking impacts may or may not actually occur. In addition, some of the strategies identified within the study could provide benefits and reduce parking demand during events. Therefore, a parking and operations field observation study could be completed during a higher capacity event within the year of opening to quantify actual impacts. A stakeholder team, including UST, the City of St. Paul, and other various stakeholders, could be developed to discuss the results of the study/observations to determine if additional mitigation strategies/improvements are needed.

Potential Improvements

Provide a Shuttle Service

- Potential shuttle service locations include, but not limited to, the UST Minneapolis Campus (Harmon Ramp), Highland Bridge (potential UST baseball/softball development parking - not currently built), and other potential off-site parking locations. It should be noted that UST has had preliminary discussions with alternative off-site parking locations.

Expand the Anderson Parking Facility (APF)

- The APF is designed with the potential to be expanded by two (2) floors. A parking lot expansion could potentially add an additional 300 parking spaces. This expansion, however, may not be compliant with the UST's conditional use permit. An expansion would also bring more vehicles near the arena where pedestrian activity is the highest, ingress into the arena may cause more queuing on Cretin Avenue, and ramp clearing times post-event would likely be longer.

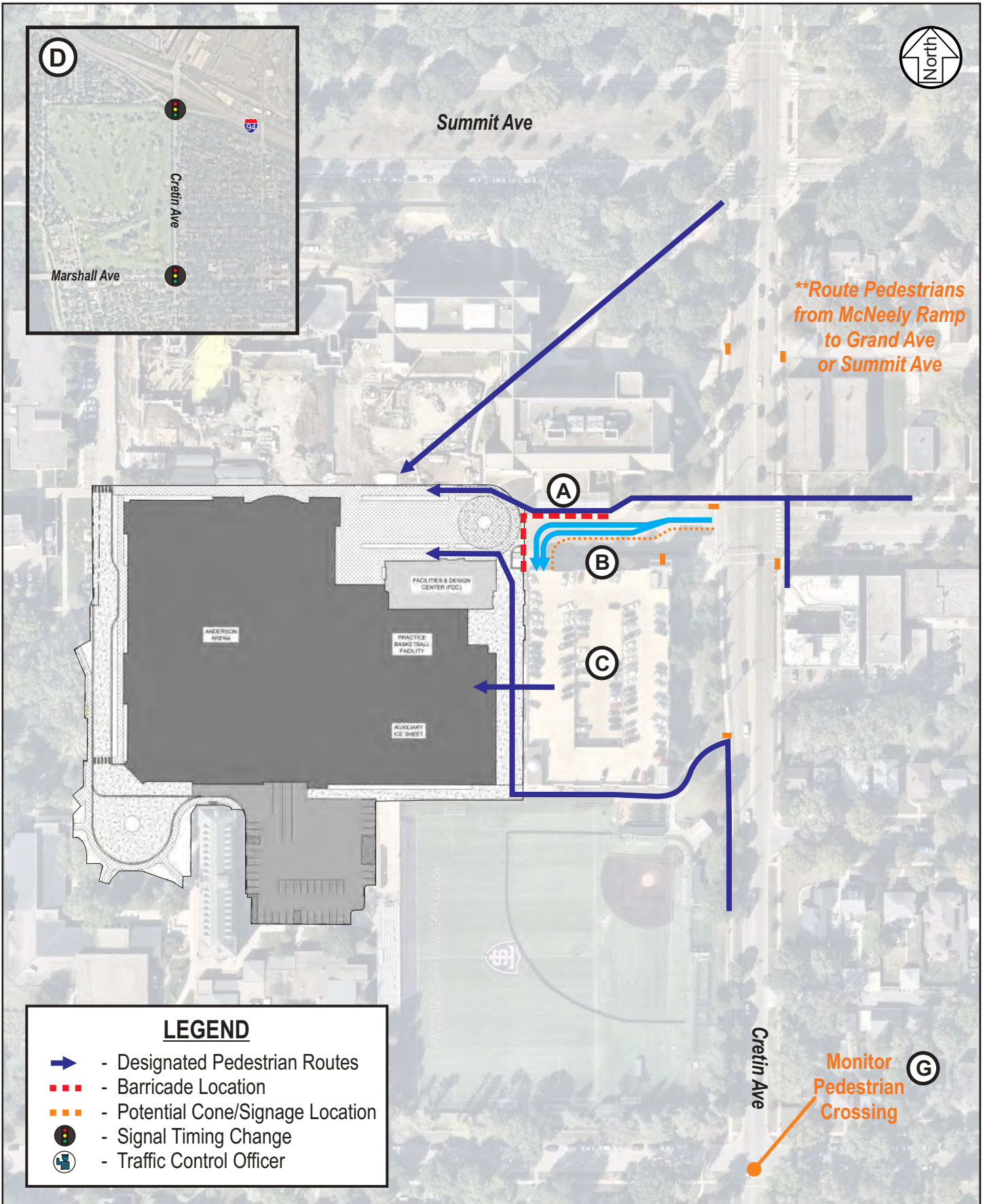
Construct a Surface Parking Lot in the SW Quadrant Adjacent to Mississippi River Boulevard

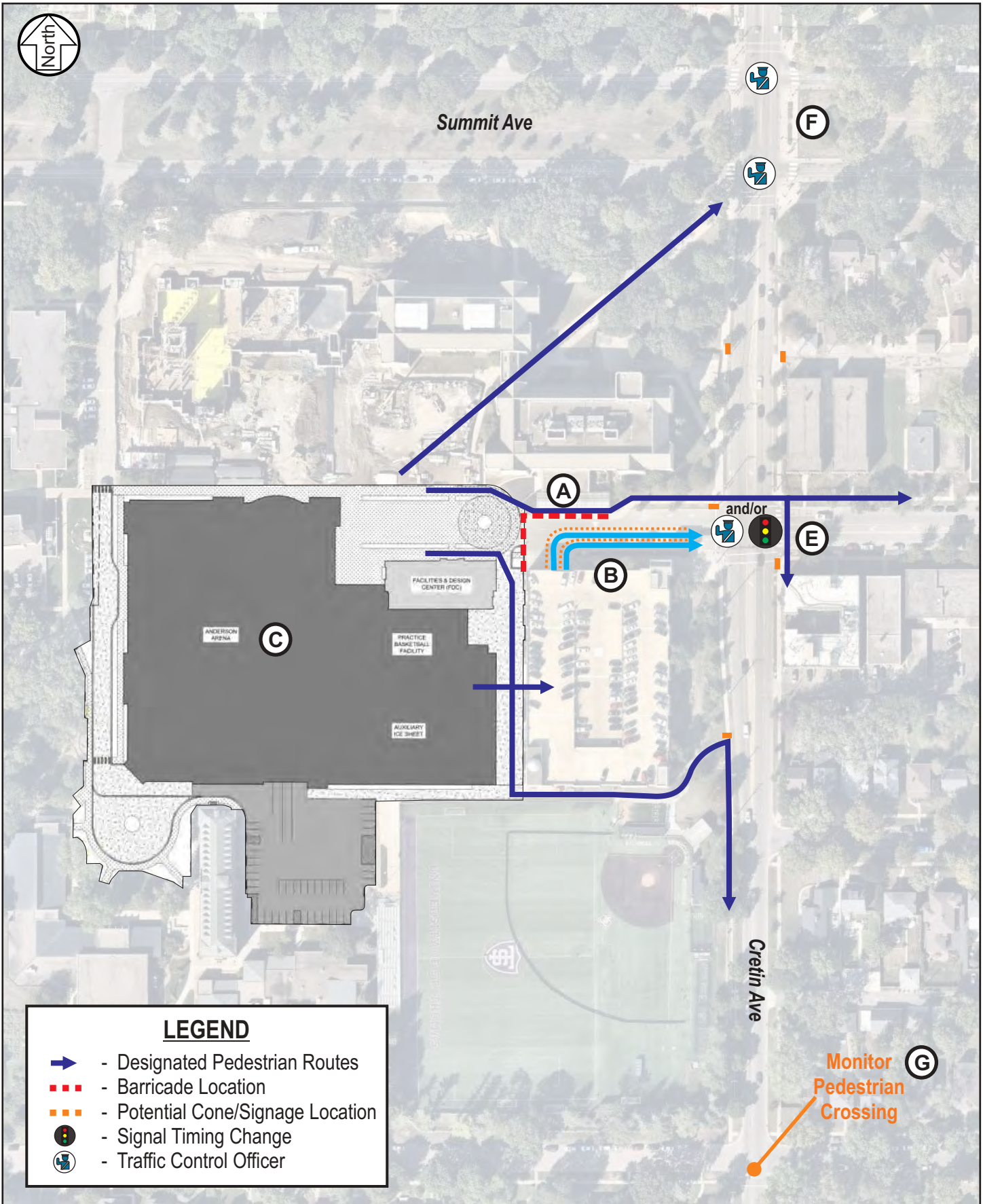
- Based on a high-level estimate of stalls per square foot, this location could potentially support a 100-space parking lot. Access to the parking lot would likely be provided along Mississippi River Boulevard, and a new pedestrian connection would be required for attendees to walk to/from the lot and the arena.

Event Management Recommendations

The following mitigation strategies are recommended to help safely and efficiently manage events and are summarized below and in Figures 12 and 13. Note the mitigation strategies are primarily focused on reducing pedestrian/vehicular conflicts, thus improving pedestrian safety and reducing event congestion.

- A) Provide designated pedestrian routes through the use of barricades, cones, and wayfinding signage. The designated pedestrian routes are shown in Figures 12 and 13, and are intended to reduce pedestrian/vehicular conflicts, thus improving pedestrian safety and traffic flow efficiencies during pre- and post-event conditions.
 - a. While not shown on the graphic, pedestrian wayfinding should be provided to/from the McNeely Ramp to ensure pedestrians do not route via the alley and cross Cretin Avenue at the mid-block. Pedestrians should be routed from the McNeely Ramp to either Cretin Avenue or Grand Avenue.
- B) Utilize cones to provide additional storage for vehicles entering the APF during pre-event conditions. Note that the APF service times/parking payment options will need to be monitored to ensure the system is efficient. If entering queues begin to impact operations along Cretin Avenue, strategies to improve service times and/or shifting parking payment to post-event may be required.





- a. During post-event conditions, cones could be considered to eliminate/reduce lane changing/merging exiting the ramp. Coning would improve traffic flow post-event, however, may result in a less direct route for event patrons. In addition, the internal ramp structure configuration should be further evaluated and modified/optimized for event purposes.
- C) Provide wayfinding signage to route pedestrians to/from the APF/Arena to utilize the western APF access, thus reducing crossing conflicts with the APF vehicular access. This can be accomplished through permanent signage and pavement markings within the APF and throughout the arena building.
- D) Event signal timing modifications could be considered at the Cretin Avenue/I-94 South Ramp and Cretin Avenue/Marshall Avenue intersections during pre-event conditions.
- a. Signal timing at Cretin Avenue/Grand Avenue and Cretin Avenue/Summit Avenue should be monitored during pre-event conditions. Note current signal timing plans change at 6:40 p.m.
- E) Provide a traffic control officer and/or construct an eastbound left-turn signal head at the Cretin Avenue/Grand Avenue intersection during post-event conditions.
- a. Note a protected eastbound left-turn phase could be beneficial during non-event conditions and smaller events (i.e., may reduce the need for traffic control officers).
 - b. The eastbound left-turn movement could be restricted during post-event conditions. Restricting the movement would greatly reduce pedestrian/vehicular conflicts along Cretin Avenue, however, may result in a less direct route for event patrons. It should be noted that a traffic control officer would likely be required to effectively implement any turn restrictions and signal timing at the Cleveland Avenue/Grand Avenue intersection would need to be further reviewed.
- F) Provide traffic control officers at the Cretin Avenue/Summit Avenue intersection to help clear traffic volumes from the APF ramp and improve pedestrian safety.
- G) Monitor the pedestrian crossing at the Cretin Avenue/Goodrich Avenue intersection. If the pedestrian crossing is heavily utilized and/or safety/yielding issues occur during pre- and post-event conditions, a traffic control officer or campus crossing guard may be needed.
- H) Yearly meetings with the City of St. Paul staff (public works, SPPD), before and after the winter sporting seasons to discuss potential modifications to event management should occur.

Other Considerations

- a. Rideshare pick-up/drop-offs are expected to occur on various roadways near the arena. While no issues are expected, rideshare should continue to be monitored to determine if any issues occur for residents or traffic, and if so, a designated rideshare location could be investigated.

- b. Consider providing wayfinding signage on the roadway network to direct event patrons to alternative lots. If not ticketed, consider providing DMS signage outside of the APF informing event patrons when the APF is full.
- c. Consider providing activities and incentives on-site or nearby for event patrons to arrive early and stay late after an event, to spread out arrival and departure times.
- d. Several mitigation strategies identified involve the use of St Paul Police Department (SPPD) traffic control officers. Therefore, further communication with the SPPD should occur to determine the availability, feasibility, and other pertinent information regarding the proposed traffic management strategies.
- e. Provide early event communication/notification to local businesses/residents and those who drive/walk/bike or take transit through the area. This can be accomplished through media outlets, email notifications, websites, etc.
- f. Develop an emergency plan. Emergency services (police, fire, etc.) will need to develop a plan to ensure safety and maximize efficiency in dealing with incidents on the transportation system or at the facility.

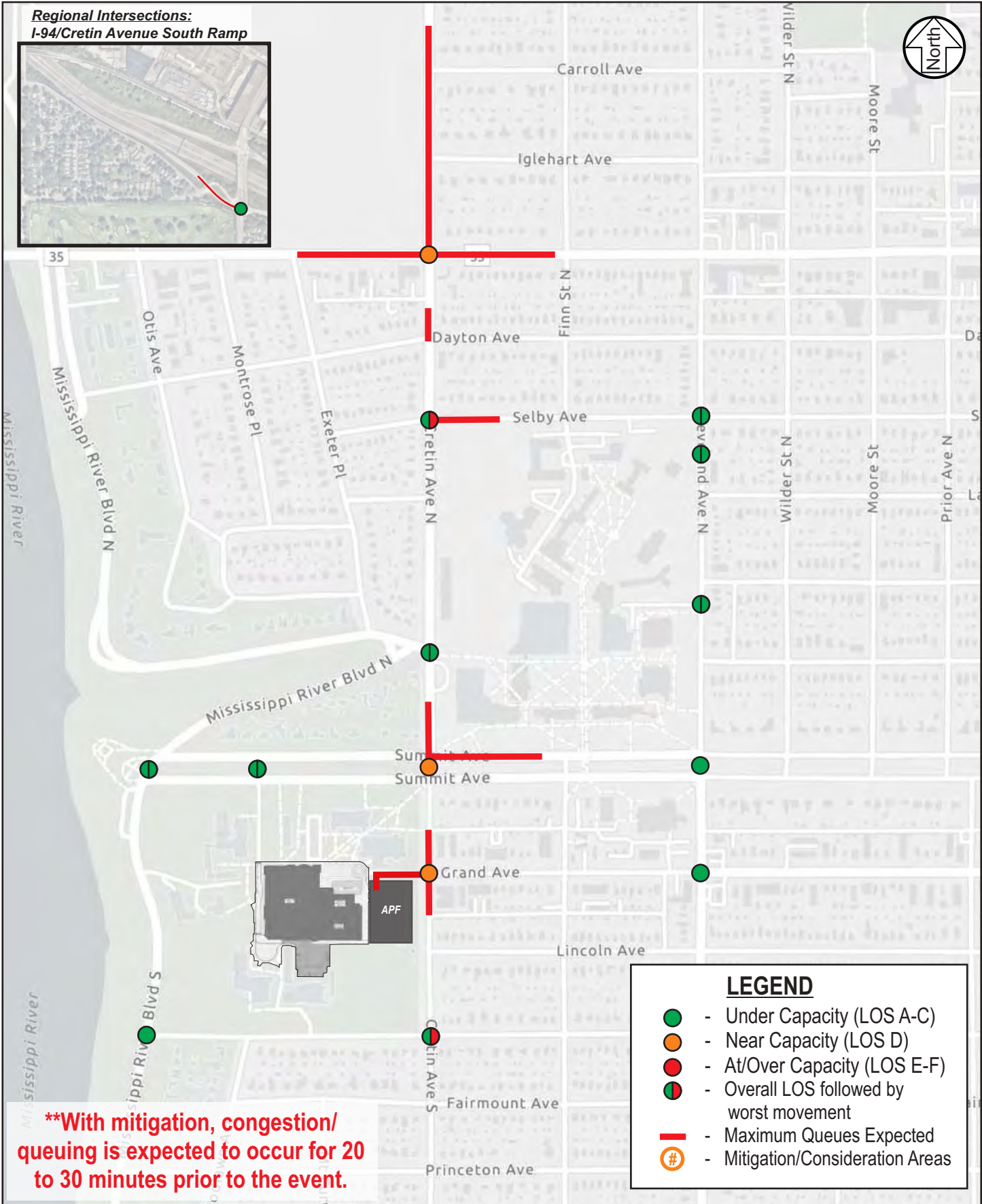
Operations Analysis with Mitigation

An operations analysis was conducted for both pre-event and post-event conditions during a maximum capacity weeknight event with the mitigation strategies and proposed pedestrian routing identified in Figures 12 and 13. An illustrative summary of the pre- and post-event operations with mitigation are shown in Figures 14 and 15, respectively, with a summary table of results in Appendix D.

Note that even with the proposed mitigation strategies, there are still anticipated to be queuing areas, which is expected given the characteristics of events. As mentioned previously, the operations at Cretin Avenue/Grand Avenue will be heavily dependent on the service times/parking payment options entering the APF. These operations will need to continue to be monitored and if queuing impacts occur, strategies to improve service times or shift parking payment to post-event may be required.

During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 15 to 30 minutes. These approaches mostly consist of low-volume residential traffic. As mentioned previously, communication should be made to area residents and other sources of commuter traffic, so they are aware of potential event traffic and the most efficient route to get to/from their destination.

Post-event the APF will remain congested, however, with the mitigation plan the APF is anticipated to be cleared in approximately 15 to 30 minutes, rather than the approximately 45 minutes to one (1) hour anticipated with no mitigation.





Typical Event (3,000) Operations and Mitigation

The primary difference between typical and maximum event attendances is that parking under maximum events will be further dispersed from the APF and Arena. During typical events, parking in the APF, ASC, McNeely and nearby will be at capacity, similar to a maximum event. Therefore, the event management strategies recommending pedestrian routing and APF ramp operations should continue for both typical/maximum events. Some of the noticeable differences in the two events from an event management perspective are as follows:

- Mitigation D - Less regional impacts are expected and traffic signal improvements at I-94/Cretin Avenue and Cretin Avenue/Marshall Avenue intersections are likely not needed.
- Mitigation F – Lower pedestrian volumes may reduce the need for traffic control officers at the Cretin Avenue/Summit Avenue intersection during post-event conditions.
- In general, less pedestrian and vehicular traffic may result in less queues and delays along Cretin Avenue.

Conclusion

SRF has completed a transportation study for the proposed University of St. Thomas (UST) multipurpose arena development in the City of St. Paul. In general, no significant operational or safety issues currently occur near campus or at the study intersections.

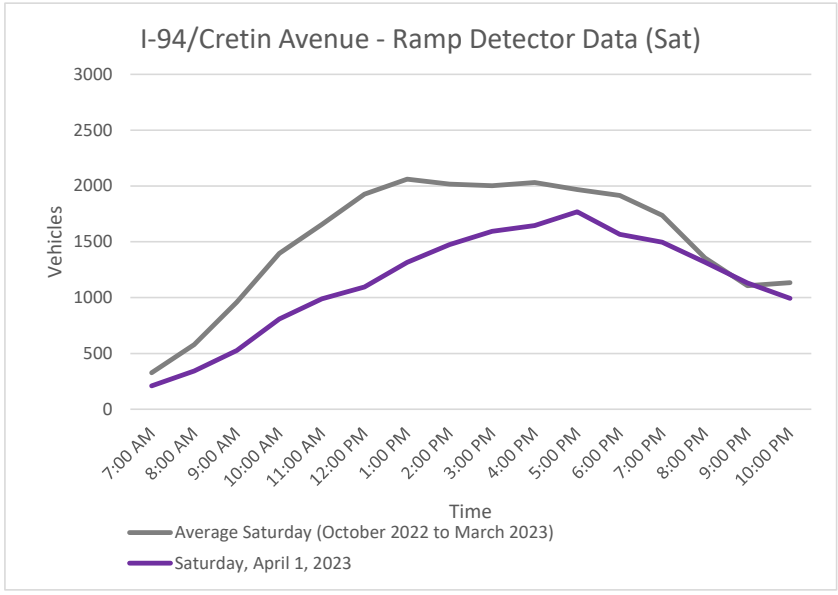
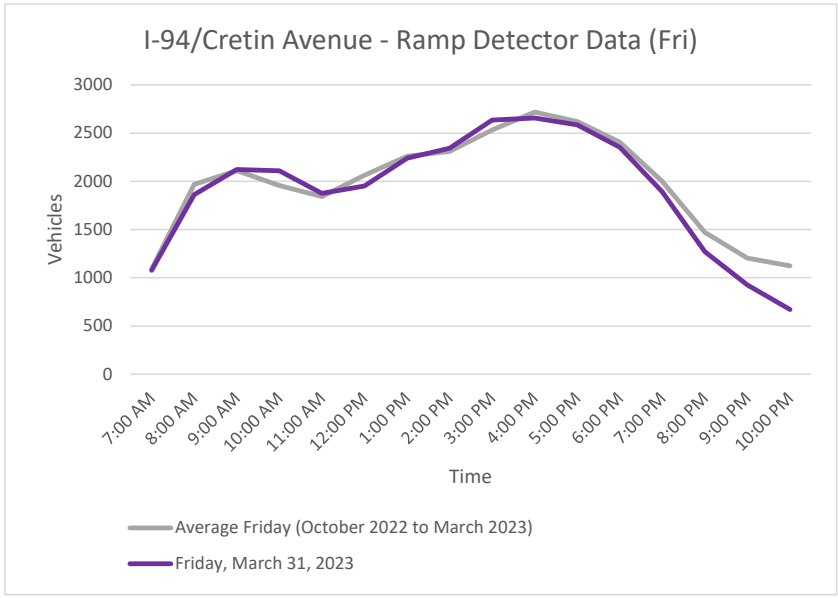
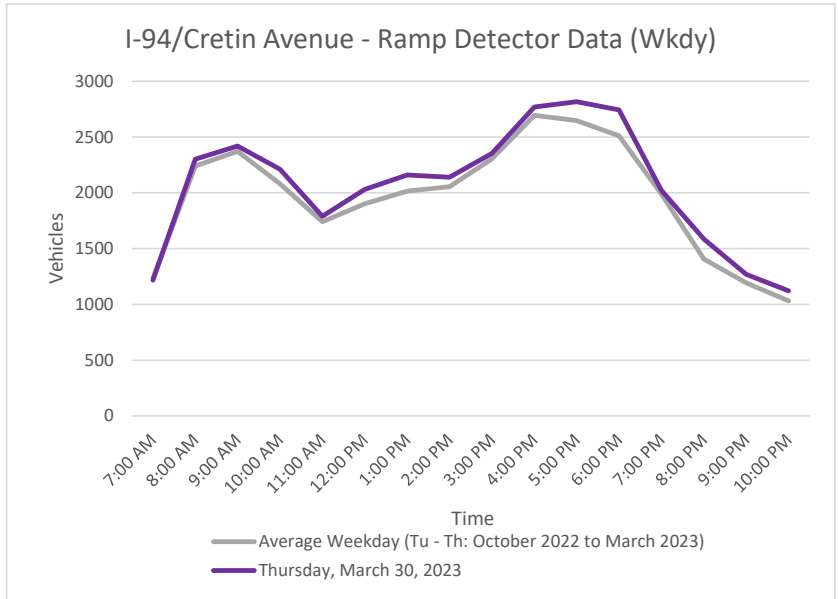
The proposed development is expected to result in a net loss of approximately 265 parking spaces. The available parking supply during the peak demand periods on campus was reviewed, and alternative parking sources are able to accommodate the increase in parking, however, parking considerations were identified. Potential mitigation strategies to reduce the parking demand on a daily basis were provided.

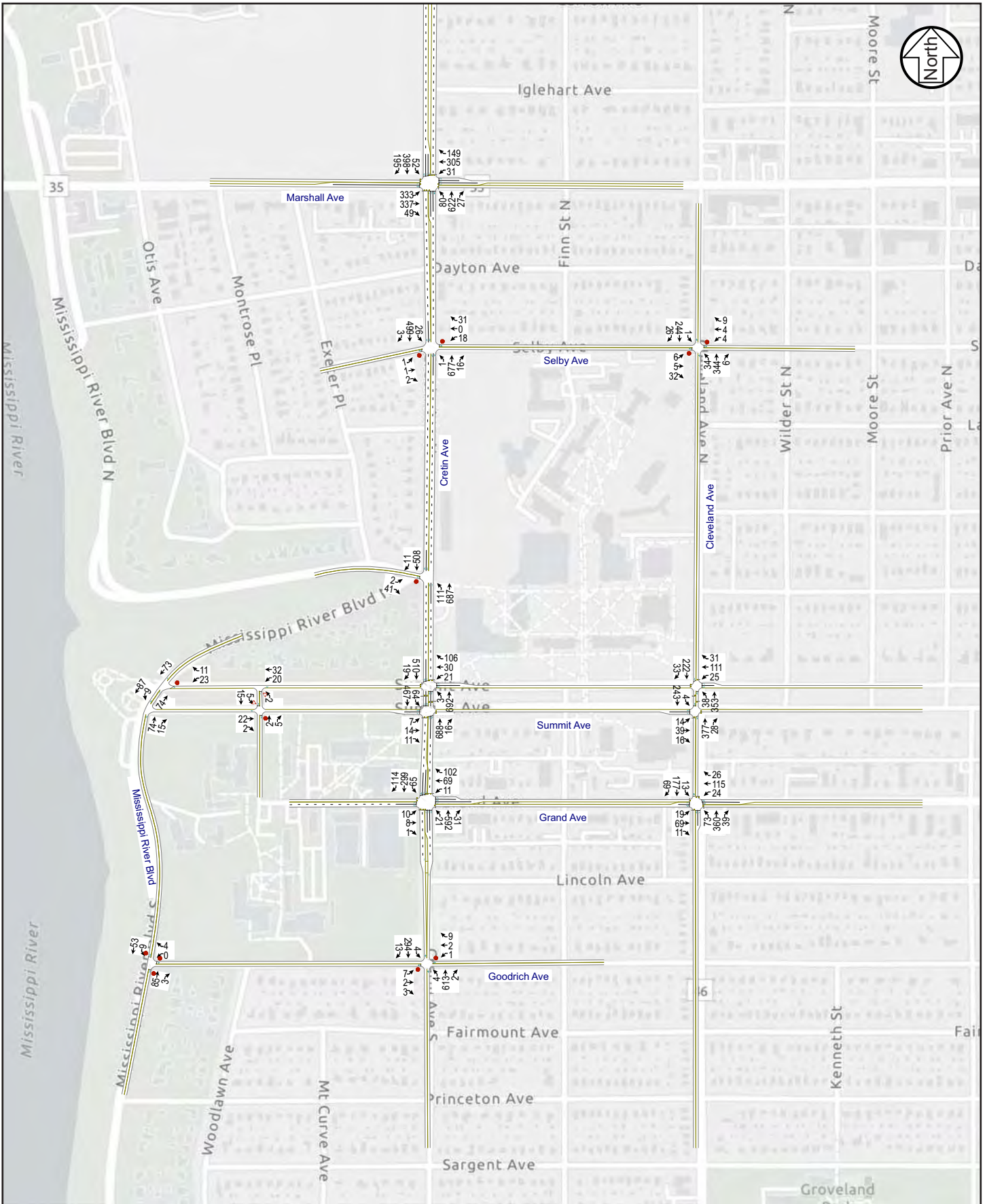
Event conditions were evaluated to understand any transportation and parking impacts and issues. Weeknight and/or larger events are anticipated to have a parking deficit on campus. However, based on similar program attendances, these events are only expected to occur five (5) to ten (10) times per year. Several potential mitigation strategies and improvements were provided to help reduce the parking demand impacts. In addition, event traffic operations were evaluated, and several event management strategies were recommended to help safely and efficiently manage events. The strategies were primarily focused on reducing pedestrian/vehicular conflicts, thus improving pedestrian safety and reducing event congestion.

As the project proceeds, further refinement of the potential mitigation strategies is expected. The mitigation/management strategies will continue to be refined as events occur and a better understanding of event operations are experienced.

Appendix A
Existing Traffic Volumes

Figure A1

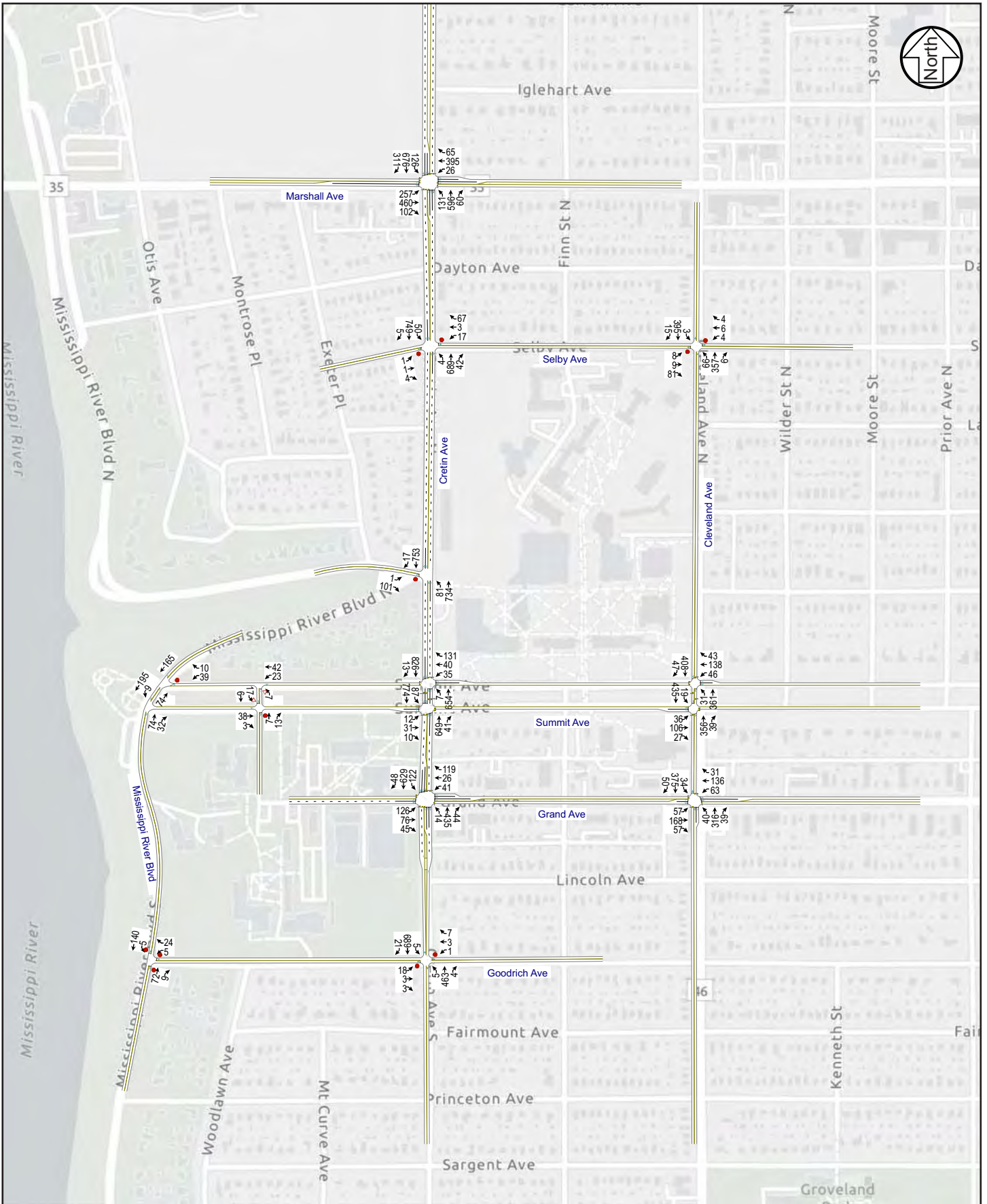




Existing AM Peak Hour (7:30 to 8:30 a.m.)

UST Multipurpose Arena EAW Transportation Study
City of St. Paul

Figure A2



Existing PM Peak Hour (4:45 to 5:45 p.m.)
 UST Multipurpose Arena EAW Transportation Study
 City of St. Paul

Figure A3

Appendix B
Safety Analysis

Table B1 - Crash Type Summary (Jan. 2018 - Dec. 2022)

Intersections	Single Vehicle Crashes			Multiple Vehicle Crashes					Total
	Bike	Ped	Run Off Road	Left Turn/ Angle	Head On	Rear End	Side Swipe	Other	
Cretin Ave /Marshall Ave	-	1	2	4	3	6	2	1	19
Cretin Ave N / Selby Ave	-	-	-	3	-	-	1	-	4
Cretin Ave N / Mississippi River Blvd	-	-	1	-	-	-	-	-	1
Cretin Ave N / Summit Ave	1	2	-	2	-	2	-	-	7
Cretin Ave N / Grand Ave	-	-	-	2	-	-	1	1	4
Cretin Ave N / Goodrich Ave	-	-	-	-	-	-	1	-	1
Cleveland Ave N / Selby Ave	-	-	-	-	-	1	-	2	3
Cleveland Ave N / Summit Ave	-	1	-	2	-	1	-	-	4
Cleveland Ave N / Grand Ave	-	-	-	-	-	-	1	2	3
Mississippi River Blvd / Summit Ave	-	-	1	-	-	-	-	-	1
Mississippi River Blvd / Goodrich Ave	-	-	-	-	-	-	-	-	0
Total	1	4	4	13	3	10	6	6	47

Table B2 - Intersection Crash Rate Analysis (2018 - 2022)

Intersection	Intersection Type	Crash Rate		
		Average	Actual	Critical
Cretin Ave / Marshall Ave	Urban Signal	0.508	0.272	0.730
Cretin Ave / Selby Ave	Urban Thru-Stop	0.128	0.132	0.310
Cretin Ave / Mississippi River Blvd	Urban Thru-Stop	0.128	0.031	0.300
Cretin Ave / Summit Ave	Urban Signal	0.508	0.174	0.810
Cretin Ave / Grand Ave	Urban Signal	0.508	0.117	0.840
Cretin Ave / Goodrich Ave	Urban Thru-Stop	0.128	0.040	0.330
Cleveland Ave / Selby Ave	Urban Thru-Stop	0.128	0.139	0.350
Cleveland Ave / Summit Ave	Urban Signal	0.508	0.136	0.860
Cleveland Ave / Grand Ave	Urban Signal	0.508	0.118	0.890
Mississippi River Blvd / Summit Ave	Urban Thru-Stop	0.128	0.051	0.360
Mississippi River Blvd/Goodrich Ave	Urban All Way Stop	0.267	0.00	1.390

= Crash Rate is above average rate but below the critical crash rate.

Appendix C

Parking Utilization Counts

Figure C1

Lot ID	Side of Street	Parking Supply	Occupied Spaces							
			Weekday (Wednesday, March 29th)		Weeknight (Thursday, March 30th)		Friday (Friday, March 31st)		Saturday Saturday, April 1st	
			1:00 PM	% Utilized	6:00 PM	% Utilized	6:00 PM	% Utilized	6:00 PM	% Utilized
UST Campus Lots (Visitor Lots or open for visitors after 4 p.m.)										
APF		691	613	89%	308	45%	96	14%	69	10%
ASC		118	94	80%	22	19%	18	15%	10	8%
McNeely		104	51	49%	18	17%	8	8%	8	8%
Tommie East		59	31	53%	9	15%	11	19%	15	25%
Tommie North		112	87	78%	52	46%	51	46%	53	47%
Total		1084	876	81%	409	38%	184	17%	155	14%
On-Street Parking (Adjacent to Campus) (No City Permit Required)										
Summit Avenue (West of UST South Access) ⁽⁵⁾	South	22	21	95%	8	36%	0	0%	0	0%
Summit Avenue (West of Cretin Ave)	South	32	30	94%	30	94%	9	28%	1	3%
Summit Avenue (West of Finn St)	North	20	12	60%	18	90%	13	65%	6	30%
	South	25	21	84%	23	92%	23	92%	3	12%
Summit Avenue (West of Cleveland Ave)	North	22	23	105%	23	105%	20	91%	8	36%
	South	22	17	77%	16	73%	16	73%	6	27%
Cleveland Avenue	East	12	13	108%	10	83%	3	25%	4	33%
Goodrich Avenue ⁽⁵⁾	North	52	56	108%	51	98%	6	12%	5	10%
Cretin Avenue ⁽¹⁾	East	40	40	100%	4	10%	0	0%	1	3%
Selby Avenue (West of Finn St) ⁽²⁾	South	28	23	82%	24	86%	23	82%	14	50%
Selby Avenue (East of Finn St) ⁽²⁾	South	28	22	79%	21	75%	17	61%	13	46%
Grand Avenue (East of Finn St) ⁽⁶⁾	North	18	17	94%	17	94%	17	94%	11	61%
	South	20	15	75%	16	80%	17	85%	13	65%
Finn Street ⁽³⁾	East	14	11	79%	13	93%	6	43%	1	7%
	West	14	13	93%	11	79%	12	86%	2	14%
Total		369	334	91%	285	77%	182	49%	88	24%
Total (Visitor & On-Street)		1453	1210	83%	694	48%	366	25%	243	17%
UST Campus Lots (Commuter, Faculty/Staff, SOD Permit Parking Locations)										
Lot A ⁽⁷⁾		56								
Lot B		55	55	100%	27	49%	32	58%	35	64%
Lot C		46	46	100%	27	59%				
Lot D		9	9	100%	5	56%				
Lot G		23	23	100%	21	91%	11	48%	11	48%
Lot I		16	16	100%	11	69%				
Lot K		42	42	100%	30	71%	1	2%	1	2%
Lot L		12	12	100%	5	42%				
MRH Level 1		31	21	68%	15	48%				
Lot N		9	9	100%	6	67%	1	11%	0	0%
Lot O		190	85	45%	43	23%	45	24%	29	15%
Lot P1 (South)		18	16	89%	3	17%	1	6%	0	0%
Lot P1 (NW)		22	20	91%	5	23%	3	14%	1	5%
Lot V		33	20	61%	11	33%	9	27%	7	21%
Lot X		21	14	67%	12	57%	9	43%	8	38%
Lot Y		31	29	94%	24	77%	21	68%	22	71%
Total		444								
Total		558	417	75%	245	44%	133	30%	114	26%
On-Street City Permit Parking Locations										
Summit Avenue (East of Cleveland Ave)	North	42	9	21%	2	5%	3	7%	1	2%
	South	60	11	18%	5	8%	0	0%	5	8%
Cleveland Avenue ⁽⁴⁾		34	30	88%	31	91%	24	71%	17	50%
Total		136	50	37%	38	28%	27	20%	23	17%
Total Permit (Campus & On-Street)		694	467	67%	283	41%	160	23%	137	20%
All Parking		2147	1677	78%	977	46%	526	24%	380	18%

- (1) No Parking or Stopping 7-9 am; 4-6 pm (Mon-Fri) Estimated
- (2) Snow Plow Route Visitor Parking (On-campus or on-street adjacent) expected to be utilized by event patrons:
- (3) 2 Hour Parking 8 am to 6 pm - (Mon - Fri) On-Street Parking (City Permit Required)
- (4) Numerous Restrictions and Signage Clutter UST Permit Parking Only
- (5) No parking 10 pm to 6 am Spring 2023 Parking Utilization Data provided by UST
- (6) 1 Hour Parking 8 am to 6 pm - (Mon - Fri) Impacted by project - parking likely displaced to other lots
- (7) Lot A Closed for Construction Data Not Collected

Appendix D

Event Assumptions/Operations

Figure D1

UST Max Capacity Event Assumptions		
Event Capacity		5500
Students	22%	1200
Non-Students	78%	4300
Student Modal Split Assumptions		
Student Modal Split Assumptions		1200
Passenger Vehicle Trips	10%	120
Rideshare (Uber/Lyft/Taxi, etc.)	10%	120
Transit/Shuttle (Local Bus)	5%	60
Walk/Bike Share	75%	900
Non-Student Modal Split Assumptions		
Non-Student Modal Split Assumptions		4300
Passenger Vehicle Trips	88%	3784
Rideshare (Uber/Lyft/Taxi, etc.)	5%	215
Transit/Shuttle (Local Bus)	2%	86
Walk/Bike Share	5%	215
Vehicle Occupancy		2.75
Event Times		
	Start	7:00 PM
	End	9:00 PM
Event Traffic During Peak Hour Analysis		
	Arrival	90%
	Departure	95%

Comments:

*Based on number of student section seats proposed

*Estimated that 4,000 students (~2,600 on-campus, 1,400 off-campus) live within walking distance (3/4-mile from arena). This represents approximately 70 percent of undergraduate students.

*Approximately 7 percent of students own Metro Transit College Pass (C-pass provides unlimited bus rides)
 *Other factors such as on-campus attendance vs. off-campus attendance, and students meeting up before/after games, may increase walking percentages.

*15 percent of basketball ticket purchases were from within the McCalster/Groveland Neighborhood. Estimated to be over 650 residential homes within 1/2-mile of the arena, likely near 2,000 homes within 3/4-mile of the arena.

*Based on Local Event Studies and numerous technical resources

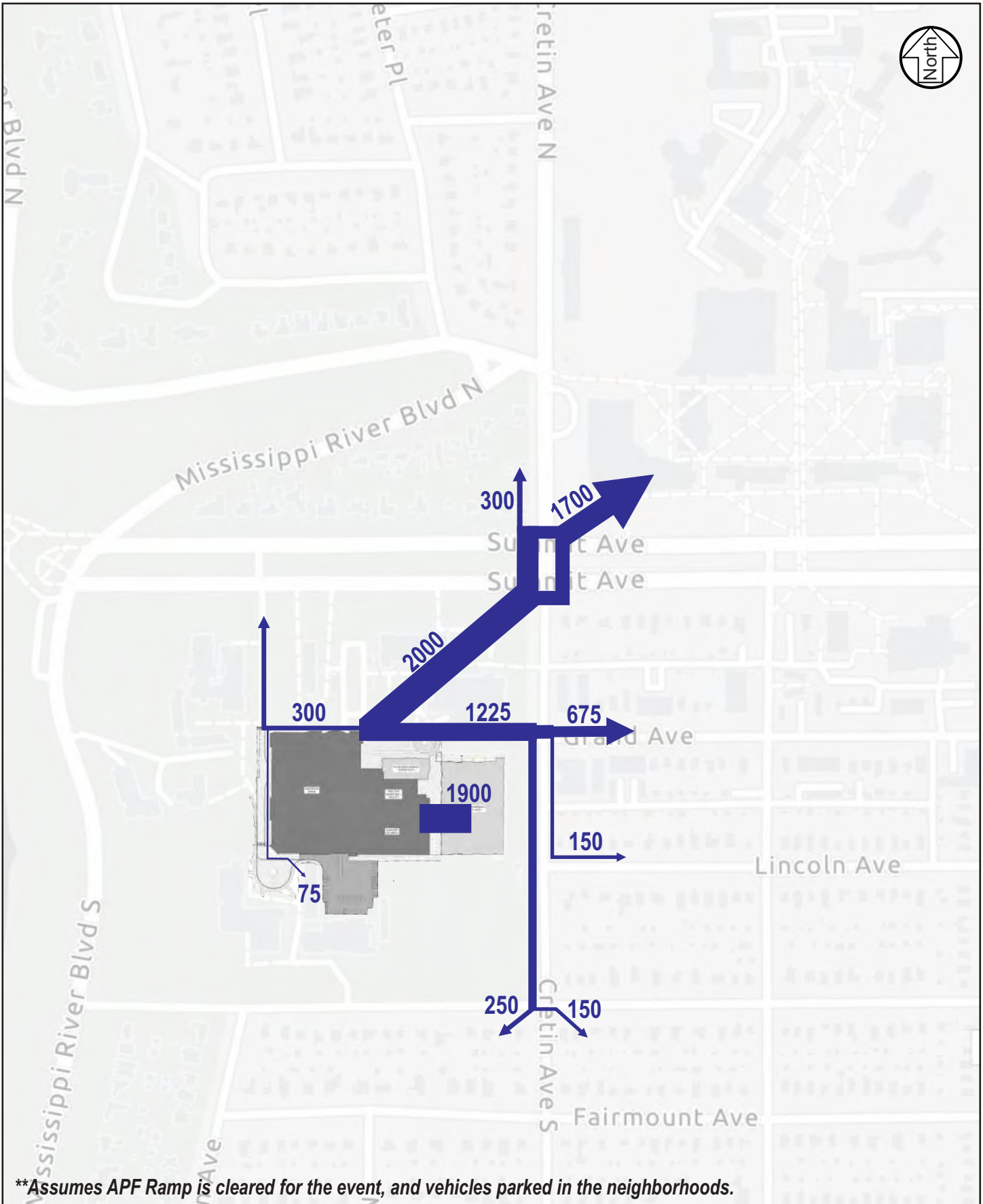
*10-20 percent of stadium is Premium Seating; pre-game dinner/drinks
 *5 percent accounts for attendance leaving early and/or post-game family/friends

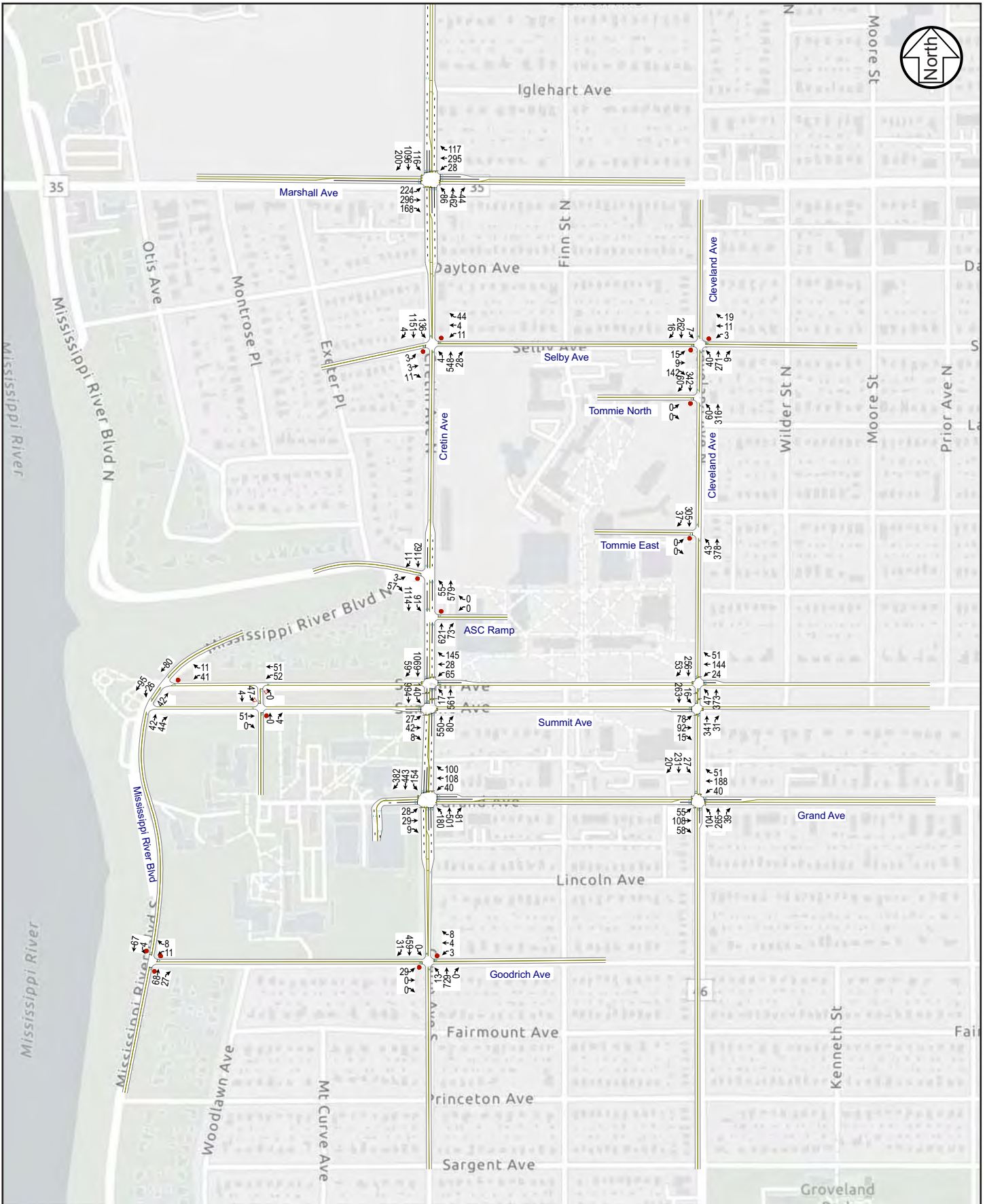
Figure D2

UST Typical Event Assumptions		
Event Capacity		3000
Students	22%	660
Non-Students	78%	2340
Student Modal Split Assumptions		
		660
Passenger Vehicle Trips	10%	66
Rideshare (Uber/Lyft/Taxi, etc.)	10%	66
Transit/Shuttle (Local Bus)	5%	33
Walk/Bike Share	75%	495
Non-Student Modal Split Assumptions		
		2340
Passenger Vehicle Trips	88%	2059
Rideshare (Uber/Lyft/Taxi, etc.)	5%	117
Transit/Shuttle (Local Bus)	2%	47
Walk/Bike Share	5%	117
Vehicle Occupancy		
		2.75
Event Times		
	<i>Start</i>	7:00 PM
	<i>End</i>	9:00 PM
Event Traffic During Peak Hour Analysis		
	<i>Arrival</i>	90%
	<i>Departure</i>	95%

Table D3 – Transportation Network - Peak Hour Volume Comparison

Mode	Existing Weekday		2025 Typical (3,000) Event		2025 Max (5,500) Event	
	AM Peak (7:30-8:30 am)	PM Peak (4:45-5:45 pm)	Pre-Event (6-7 pm)	Post-Event (9-10 pm)	Pre-Event (6-7 pm)	Post-Event (9-10 pm)
Cretin Ave (N of Marshall)	1,750	2,030	1,920	1,185	2,215	1,520
Cretin Ave (S of Goodrich)	920	1,165	1,050	600	1,200	710
Cleveland Ave (S of Goodrich)	685	890	675	420	740	520
Summit Ave (E of Cleveland)	240	390	320	185	360	250
Grand Ave (E of Cleveland)	285	475	400	230	450	300





2025 Max Capacity Pre-Event Conditions (6 to 7 pm)

UST Multipurpose Arena EAW Transportation Study
City of St. Paul

Figure D6

Table D8 - 2025 Build Maximum Capacity (5,500) Event Operations

Intersection	Pre-Event		Post-Event	
	No Mitigation	Mitigation	No Mitigation	Mitigation
Cretin Avenue / Marshall Avenue	C	D	C	C
Cretin Avenue / Selby Avenue ⁽¹⁾	A/E	B/F	A/C	A/B
Cretin Avenue /Mississippi River Boulevard ⁽¹⁾⁽³⁾	A/B	A/B	A/A	A/A
Cretin Avenue / Summit Avenue	D	D	D	C
Cretin Avenue / Grand Avenue	E	D	F	D
Cretin Avenue / Goodrich Avenue ⁽¹⁾	F/F	C/F	A/C	A/C
Cleveland Avenue / Selby Avenue ⁽¹⁾	A/A	A/A	A/A	A/A
Cleveland Avenue / Summit Avenue	B	B	B	B
Cleveland Avenue / Grand Avenue	B	B	B	B
Mississippi River Boulevard / Summit Avenue ⁽¹⁾	A/A	A/A	A/A	A/A
Mississippi River Boulevard / Goodrich Avenue ⁽²⁾	A	A	A	A

- (1) Indicates an unsignalized intersection with side-street stop control, where the overall LOS is shown followed by the worst side-street approach LOS. The delay shown represents the worst side-street approach delay.
- (2) Indicates an unsignalized intersection with all-way stop control, where the overall LOS is shown.
- (3) The eastbound approach has a no-left turn restriction.

Table D9 - Similar Men's Hockey Program Stadium Capacities

Program	Stadium Capacity
Michigan Tech	4,470
Bemidji St	4,400
Bowling Green	5,000
Northern Michigan	4,200
Lake Superior	4,000
Average	4,414

Table D10 - Similar Men's Basketball Program Stadium Capacities

Program	Stadium Capacity
Nebraska-Omaha	7,900
NDSU	5,460
SDSU	5,200
USD	6,000
UND	3,300
Denver	7,200
UW-Milwaukee**	10,780
Average	6,549

***Not in the Summit League*

APPENDIX B

Agency Comments

Josh Williams

From: Josh Williams
Sent: Tuesday, July 11, 2023 8:29 AM
To: *CI-StPaul_StThomasArena_EAW
Subject: Fw: MVP-2023-00747-JST 20230710 University of St. Thomas Multipurpose Arena PreApp
Attachments: 2023-00747-JST 20230710 PreApp.pdf

From: Toth, Joseph S CIV (USA) <Joseph.Toth@usace.army.mil>
Sent: Monday, July 10, 2023 3:03 PM
To: Anthony Adams <Anthony.Adams@RyanCompanies.com>
Cc: Josh Williams <josh.williams@ci.stpaul.mn.us>; Meincke, Alexander C CIV USARMY CEMVP (USA) <Alexander.C.Meincke@usace.army.mil>
Subject: MVP-2023-00747-JST 20230710 University of St. Thomas Multipurpose Arena PreApp

Think Before You Click: This email originated outside our organization.

Good afternoon,

We have reviewed the report referenced in the subject line for the University of St. Thomas Multipurpose Arena project proposed by the University of St. Thomas and I am attaching a pre-application letter containing information pertinent to this project. If you have any questions, please reach out to either the phone number and/or email listed within the letter. Thanks!

Joseph Toth (he/him/his)
USACE Regulatory Specialist
St. Paul District Office
332 Minnesota Street, Suite E1500
St. Paul, MN 55101
Office Phone: (651) 290-5532
Work Cell: (651) 242-1321



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
332 MINNESOTA STREET, SUITE E1500
ST. PAUL, MN 55101-1323
JULY 10, 2023

Regulatory File No. MVP-2023-00747-JST

Ryan Companies US, Inc.
c/o Anthony Adams
533 South Third Street, Suite 100
Minneapolis, MN 55415

Dear Anthony Adams:

This letter is in response to correspondence we received from the City of St. Paul regarding the University of St. Thomas Multipurpose Arena project located in Section 5, Township 28 North, Range 23 West, Ramsey County, MN . This letter contains our initial comments on this project for your consideration. The purpose of this letter is to inform you that based on the Environmental Assessment Worksheet: University of St. Thomas Multipurpose Arena, a Department of the Army (DA) permit would not be required if there are no impacts to aquatic resources for your proposed activity. In lieu of a specific response, please consider the following general information concerning our regulatory program that may apply to the proposed project.

If the proposal involves activity in navigable waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 (Section 10). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit.

If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (CWA Section 404). Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps evaluation of a Section 10 and/or a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

If the proposal requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic

Regulatory Division (File No. MVP-2023-00747-JST)

ecosystem, so long as the alternative does not have other significant adverse environmental consequences” (40 CFR § 230.10(a)). Time and money spent on the proposal prior to applying for a Section 404 permit cannot be factored into the Corps’ decision whether there is a less damaging practicable alternative to the proposal.

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

If you have any questions, please contact me in our St. Paul office at (651) 290-5532 or Joseph.Toth@usace.army.mil. In any correspondence or inquiries, please refer to the Regulatory file number shown above.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Toth".

Joseph Toth
Regulatory Specialist

cc:
Josh Williams (RGU, City of Saint Paul)



July 27, 2023

Josh Williams, Principal Planner
City of St. Paul
25 West Fourth Street
St. Paul, MN 55102

RE: City of St. Paul – Environmental Assessment Worksheet (EAW) – University of St. Thomas Multipurpose Arena
Metropolitan Council Review No. 22881-1
Metropolitan Council District No. 14

Dear Josh Williams:

The Metropolitan Council received the EAW for the University of St. Thomas Multipurpose Arena project in the City of St. Paul on June 27, 2023. The proposed project is located on the University of St. Thomas (UST) South Campus. The proposed project is a redevelopment of an approximately 6-acre site into a multipurpose competition venue for the University's hockey and basketball programs with capacity for 4,000 to 5,500 spectators. The new facility will include practice facilities, coaching offices, locker rooms, and student athlete support services.

The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes.

We offer the following comments for your consideration.

Item 12 b.i. Water Resources – Sanitary Sewers Roger Janzig, ES.

Roger.janzig@metc.state.mn.us

To properly calculate the potential wastewater flow for this facility, the City should submit facility site plans including spectator capacity, locker rooms, meeting rooms, storage and concession areas and any retail components that may generate and contribute to wastewater generation.

Item 20, Transportation (Joe Widing, MTS, 651-602-1822)

The transit discussion in the transportation study does not discuss or consider the planned changes to existing Route 21 and the upcoming B-Line Bus Rapid Transit (BRT) from Metro Transit. When the BRT commences operation, service changes to the UST campus is possible. The City should submit analysis of what that could mean for transit usage to/from the new arena.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Patrick Boylan, Principal Reviewer, at 651-602-1438 or via email at patrick.boylan@metc.state.mn.us.

Sincerely,

A handwritten signature in blue ink that reads "Angela R. Torres". The signature is written in a cursive style and is positioned above a light blue rectangular background.

Angela R. Torres, AICP, Senior Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
W. Toni Carter, Metropolitan Council District 14
Patrick Boylan, Sector Representative/Principal Reviewer
Reviews Coordinator

N:\CommDev\LPA\Communities\St. Paul\Letters\St. Paul 2023 University of St. Thomas Multipurpose Arena EAW 22881-1.docx

Josh Williams

From: Josh Williams
Sent: Thursday, July 27, 2023 3:54 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: FW: University of St. Thomas Multipurpose Arena EAW - DNR Comments
Attachments: 2023-00262NHletter.pdf; 2023-07-27-UniversityofStThomasMultipurposeAreaEAW-DNRcmtltr.pdf

From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Sent: Thursday, July 27, 2023 12:24 PM
To: Josh Williams <josh.williams@ci.stpaul.mn.us>
Cc: Anthony Adams <Anthony.Adams@RyanCompanies.com>
Subject: University of St. Thomas Multipurpose Arena EAW - DNR Comments

Think Before You Click: This email originated **outside** our organization.

Dear Josh Williams,

Thank you for the opportunity to review the University of St. Thomas Multipurpose Arena EAW. Please see the attached DNR comment letter and Natural Heritage letter. A confirmation of receipt would be most appreciated.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources
Pronouns: She/her/hers

Minnesota Department of Natural Resources

1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5755
Email: melissa.collins@state.mn.us
mndnr.gov



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

Transmitted by Email

July 27, 2023

Josh Williams, Principal Planner
City of St. Paul
25 West Fourth Street
St. Paul, MN 55102

Dear Josh Williams,

Thank you for the opportunity to review the University of St. Thomas Multipurpose Area Environmental Assessment Worksheet (EAW) located in Ramsey County. The DNR respectfully submits the following comments for your consideration:

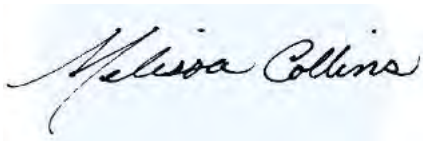
1. Page 17, Groundwater. Please note that the project area contains the St. Paul Seminary Spring (field verified by the University of Minnesota Earth Sciences Dept.; Glacial-Decorah contact). This spring is located near the head of the ravine/stream that slopes towards the Mississippi River along the western boundary of the project area. The EAW identifies the area adjacent to the spring as the Grotto (page 22, *Other Surface Waters*), and describes measures that will be taken to avoid impacting the groundwater hydrology. This spring is likely the source of the National Hydrography Dataset stream mapped within the Grotto area, which is also a mapped Minnesota River Critical Corridor Area (MRCCA) Significant Existing Vegetative Stand. Please be aware of the location and depth of this spring when determining the placement of utilities and footings in order to avoid impacting groundwater hydrology.
2. Page 20, Stormwater. We recommend that BWSR-approved, weed-free, native [seed mixes](#) be used to the greatest degree possible in stormwater features in order to provide pollinator habitat for the federally endangered Rusty-patched Bumble Bee.
3. Page 24, Rare Features. This section of the EAW should mention that the entire project area is located within the [Mississippi River Twin Cities Important Bird Area](#) (IBA), which is a significant corridor for migrating birds. [Here](#) is a complete list of bird species documented within the IBA, which may be found within the project area.
4. Page 24, Rare Features. This section of the EAW states that results of the DNR Natural Heritage Review are pending, however a final letter was issued on May 17, 2023. The Natural Heritage letter has been attached so that it may be included with DNR comments.
5. Page 29, Visual. Lighting for this development will be important due to its location within an IBA and MRCCA. Animals depend on the daily cycle of light and dark for behaviors such as

hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. In addition to the undesirable effects of upward facing lighting, the hue of lights can also affect wildlife. LED lighting has become increasingly popular due to its efficiency and long lifespan. However, these bright lights tend to emit blue light, which can be harmful to birds, insects, and fish. The DNR recommends that any projects using LED luminaries follow the [MnDOT Approved Products for luminaries](#), which limits the uplight rating to 0, and the maximum nominal color temperature to 4000K. Please choose products that have the lowest number for backlight and glare.

We recommend that all non-essential lighting be turned off during the Mayfly hatch as well as follow the Audubon Society's Lights Out program. This program advocates for darkening all buildings and structures during the bird migration from midnight until dawn March 15 - May 31 and August 15 - Oct 31. Information on this program can be found at: <http://mn.audubon.org/conservation/lights-out-faq>.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Melissa Collins". The signature is written in a cursive style and is set against a light blue rectangular background.

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

CC: Anthony Adams, PE, Ryan Companies

Equal Opportunity Employer

Josh Williams

From: Muhic, P Cameron (DOT) <cameron.muhic@state.mn.us>
Sent: Sunday, July 16, 2023 8:30 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: MnDOT Review of St. Thomas Arena_EAW

Dear Mr. Williams,

MnDOT has reviewed the aforementioned EAW and has no comments as we anticipate it will have little to no impact on our highways.

Cordially,

Cameron Muhic
MnDOT Senior Planner

Agency Comments

U.S. Army Corps of Engineers

Comment	Response
Based on the Environmental Assessment Worksheet: University of St. Thomas Multipurpose Arena, a Department of the Army (DA) permit would not be required if there are no impacts to aquatic resources for your proposed activity.	Thank you for your comment.

Metropolitan Council

Comment	Response
The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes.	Thank you for your comment.
12 – Water Resources	
To properly calculate the potential wastewater flow for this facility, the City should submit facility site plans including spectator capacity, locker rooms, meeting rooms, storage and concession areas and any retail components that may generate and contribute to wastewater generation.	Thank you for your comment. As indicated in Section 9 of the EAW, the project proposer will submit all necessary materials to apply for a Sewer Connection Permit with the Metropolitan Council, if applicable. The project will submit a sewer Availability Charge (SAC) determination when the design plans are finalized. The SAC determination application requirements include facility site plans with the information noted by the Met Council.
20 - Transportation	

Comment	Response
<p>The transit discussion in the transportation study does not discuss or consider the planned changes to existing Route 21 and the upcoming B-Line Bus Rapid Transit (BRT) from Metro Transit. When the BRT commences operation, service changes to the UST campus are possible. The City should submit analysis of what that could mean for transit usage to/from the new arena.</p>	<p>Per the Metro Transit website, B Line service is scheduled to begin in late 2024 and will provide faster and more frequent service along the current Route 21. The planned B Line station nearest to the proposed arena will be located at Marshall Ave and Cretin Ave. Changes to local service will be announced prior to B Line operations. Faster and more frequent service will incentivize ridership on the B Line versus current Route 21 service. The campus is also served by Route 63 (Grand Ave and Cretin Ave) as well as Route 87 (Cleveland Ave).</p>

Minnesota Department of Natural Resources

Comment	Response
<p>12 – Water Resources</p>	
<p>Page 17, Groundwater. Please note that the project area contains the St. Paul Seminary Spring (field verified by the University of Minnesota Earth Sciences Dept.; Glacial-Decorah contact). This spring is located near the head of the ravine/stream that slopes towards the Mississippi River along the western boundary of the project area. The EAW identifies the area adjacent to the spring as the Grotto (page 22, Other Surface Waters), and describes measures that will be taken to avoid impacting the groundwater hydrology. This spring is likely the source of the National Hydrography Dataset stream mapped within the Grotto area, which is also a mapped Minnesota River Critical Corridor Area (MRCCA) Significant Existing Vegetative Stand. Please be aware of the location and depth of this spring when determining the placement of utilities and footings in order to avoid impacting groundwater hydrology.</p>	<p>As indicated in Section 14.a.ii. of the EAW, American Engineering Testing has prepared a draft Report of Geotechnical Exploration for the project site including penetration test borings. Groundwater was encountered in penetration test borings at depths of 6 feet to 12 feet below ground surface. The proposed arena project consists of mostly at-grade construction that will sit above known groundwater flow with the exceptions being foundation walls, utilities, and a utility tunnel needed for infrastructure. Groundwater impacts will continue to be considered as design advances in order to limit changes to the existing groundwater flow.</p>

Comment	Response
<p>Page 20, Stormwater. We recommend that BWSR-approved, weed-free, native seed mixes (https://bwsr.state.mn.us/seed-mixes) be used to the greatest degree possible in stormwater features in order to provide pollinator habitat for the federally endangered Rusty-patched Bumble Bee.</p>	<p>Stormwater management for the project is planned to be subsurface management to utilize the site area for other campus uses, therefore not requiring seed mixes within the stormwater features. As indicated in Sections 14.c. and 14.d. of the EAW, the project proposer is considering using native, non-invasive plants in landscape designs which may provide pollinator habitat.</p>
<p>14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>Page 24, Rare Features. This section of the EAW should mention that the entire project area is located within the Mississippi River Twin Cities Important Bird Area (IBA) (https://netapp.audubon.org/iba/Reports/2421), which is a significant corridor for migrating birds. Here is a complete list of bird species documented within the IBA, which may be found within the project area (https://ebird.org/barchart?byr=1900&eyr=2023&bmo=1&emo=12&r=US-MN_2421).</p>	<p>Comment noted and addressed in Section 2.2 above.</p>
<p>Page 24, Rare Features. This section of the EAW states that results of the DNR Natural Heritage Review are pending, however a final letter was issued on May 17, 2023. The Natural Heritage letter has been attached so that it may be included with DNR comments.</p>	<p>Comment noted and addressed in Section 2.2 above.</p>
<p>16 – Visual</p>	
<p>Page 29, Visual. Lighting for this development will be important due to its location within an IBA and MRCCA. Animals depend on the daily cycle of light and dark for behaviors such as hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. In addition to the undesirable effects of upward facing lighting, the hue of lights can also affect wildlife. LED lighting has become increasingly popular due to its efficiency and long lifespan. However, these bright lights tend to emit blue light, which can be harmful to birds, insects, and fish. The DNR recommends that any projects using LED luminaries follow the MnDOT Approved Products for luminaries, which limits the uplight rating to 0, and the maximum nominal color</p>	<p>As indicated in Section 16 of the EAW, the project will conform to the City of Saint Paul’s regulations for lighting.. Fixture modeling and photometric analysis will be completed for all site and building lighting to analyze light levels for the project. Additionally, the University standard for site lighting is to use LED cut-off light fixtures with a maximum nominal color temperature of 4000K. Lighting for all areas of the project site will be evaluated as part of the City of Saint Paul Site Plan Review process.</p>

Comment	Response
<p>temperature to 4000K https://www.dot.state.mn.us/products/roadwaylighting/ledrestarea.html). Please choose products that have the lowest number for backlight and glare.</p>	
<p>We recommend that all non-essential lighting be turned off during the Mayfly hatch as well as follow the Audubon Society's Lights Out program. This program advocates for darkening all buildings and structures during the bird migration from midnight until dawn March 15 - May 31 and August 15 - Oct 31. Information on this program can be found at: http://mn.audubon.org/conservation/lights-out-faq.</p>	<p>Thank you for your comment. The project will conform to all lighting requirements per City of Saint Paul City Ordinances.</p>

Minnesota Department of Transportation

Comment	Response
<p>MnDOT has reviewed the aforementioned EAW and has no comments as we anticipate it will have little to no impact on our highways.</p>	<p>Thank you for your comment.</p>

APPENDIX C

Public Comments

Josh Williams

From: Tom Alf <alftom52@gmail.com>
Sent: Thursday, July 27, 2023 7:19 AM
To: *CI-StPaul_StThomasArena_EAW
Cc: Josh Williams
Subject: Comments re: St. Thomas Arena EAW Comments

Re: St. Thomas Multipurpose Arena EAW Comments

University of St. Thomas' stated mission is to "educate students to be morally responsible leaders who think critically, act wisely and work skillfully to advance the common good". Alongside their mission UST lists Convictions: Pursuit of truth through Intellectual inquiry; Academic excellence; Faith and Reason; Dignity; Diversity; Personal Attention and Gratitude.

No mention is made in their Mission and Conviction statements of sports nor the need to achieve sports excellence by moving to Division 1 for basketball and hockey. In the EAW, Item 6d, the stated purpose of the multipurpose arena is to "...house a competition venue for the UST hockey and basketball to meet Division I athletic program expectations".

UST chose to move directly to division I from Division 3 rather than finding another Division 3 league (after being ousted from the MIAC) or going to Division 2. More importantly, highly competitive sports programs do not help UST achieve their Mission Statement nor any of their listed Convictions; whereas, improved educational facilities and better paid faculty which would help UST achieve their Mission and Convictions.

Since the arena is not a facility needed to achieve their Mission and Convictions, we ask that you do not waive zoning limitations set forth in the MRCCA – River Corridor Urban District (RC3). Similarly, we ask you to not approve the EAW given the negative impacts on environmental goals and on the negative traffic and parking issues on neighborhoods located east and south of the proposed site.

Our EAW comments:

1. General Item 6b – Construction access is via Grand Ave termination access road and another access described as "on the western boundary of the project site". Where would vehicles enter the south campus to access the western boundary of the project site? We want to make sure there is no vehicle access from Goodrich Ave to the project site.
2. Climate – Item 7 and 18
 - a. St. Thomas has indicated a goal of being climate neutral by 2035. Adding a 6,000 square foot arena with two ice sheets runs counter to UST's goal of carbon neutral by 2035. Despite trying to obtain LEED Silver certification, the arena will significantly add to Greenhouse Gas (GHG) emission over its lifetime.
 - b. Building the arena will destroy 76 existing mature trees with only 50 small new trees planted near the site. Besides losing 26 net trees, the loss of mature trees means significant loss of annual carbon capture until new trees are mature.
 - c. The project will reduce grass and landscape by one acre adding to urban heat island impact especially when including the surface area of the 6,000 sq ft arena.
3. Land Use – Item 10
 - a. Item 10 ii - This item mentions and describes the MRCCA River Towns and Crossings District (CA-TTC); however, the project site is currently falls within the+ MRCCA – River Corridor Urban District (RC3) as noted in the last sentence of this section. The River Corridor RC3 should be the zoning rule used to determine whether the project complies with those zoning rules.

The RC3 River Corridor zone calls for a maximum building height of 40 feet. The proposed project arena maximum height as noted in Item 6c is the basketball practice facility of 68 feet and 58 feet 3 inches for the main arena, both of which are substantially higher than the RC3 River Corridor zoning maximum height of 40 feet.

4. Noise -Item 19

a. The Science and Math building built in the northeast corner of the South Campus some years ago created unacceptably loud noise from HVAC equipment on top of the building. It took St. Thomas and the City of St Paul over a year to correct his issue after repeated complaints from neighbors on the south side of the South Campus. The EAW calls for operational noise testing. Please provide us specifics of operational noise testing results as they become available. We want to avoid a repeat of the Science and Math building noise issue.

5. Transportation – Item 20

a. Parking – The proposed arena poses significant hardship on the near-surrounding neighbors to the south and to the east of the South Campus. The only way that neighbors can protect themselves from basketball and hockey fans parking in front of their homes is to go through the St Paul parking permit process. They would need to request “No parking except for area permits” which makes it difficult for a household to hold moderate to large size gatherings over the weekend since each home is allowed only 2 visitor permits.

i. The EAW notes that 264 net parking spaces would be lost due to arena construction leaving the Anderson ramp the only available parking on the south campus.

ii. The transportation study goes through an elaborate analysis with a number of assumptions to attempt to determine the adequacy of on campus parking. They concluded that basketball using maximum capacity would have a parking deficit of about 330 to 740 depending whether a week night or weekend game. Given the highly competitive nature of St. Thomas sports, we feel it likely that more games for both basketball and hockey will approach max capacity than the parking study assumes.

iii. *Used page 37 parking summary analysis, Tables page 26 and 27 and Tables page 12 (Figure 3).* The parking study ignores common sense/human nature; namely, people will look for the closest and cheapest parking available. Excluding Anderson ramp on South Campus, the closest parking are the neighbors east and south of the project site. These areas will be used before the ASC ramp or the McNeely ramp. Tommie north and Tommie East will not likely be used as they are 6-8 blocks from the project site. Tommie North and East were assumed to provide 110 spaces which if not used means more fans parking in our neighborhood.

iv. All of this means the surrounding neighborhoods will have much more significant parking use than the study assumes which is an undue burden on the surrounding neighborhoods, especially, considering that the home basketball/hockey total of 32 games each for men and women which totals 64 games per year. Plus, all the other events St. Thomas plans to hold at the arena.

v. At a minimum, we strongly feel that the City must insist before their approval of the EAW, that St. Thomas add the two additional allowed floors to Anderson ramp BEFORE the arena opens.

b. Traffic

i. The study assumes about 1,500-1,600 added car trips pre and post event. With 64 basketball/hockey games plus the other events planned for the arena, the added car trips in very concentrated times periods adds much more noise and “traffic jams” during these events adding further burden to the surrounding neighborhoods.

Tom and Karen Alf
2252 Fairmount Ave

Josh Williams

From: Eric Beck <dericbeck@hotmail.com>
Sent: Friday, July 28, 2023 12:04 AM
To: *CI-StPaul_StThomasArena_EAW
Subject: Fw: Comments on St. Thomas Arena EAW..7/27/23

From: Eric Beck <dericbeck@hotmail.com>
Sent: Friday, July 28, 2023 12:01 AM
To: StThomasArenaEAW@ci.stpaul.mn.us <StThomasArenaEAW@ci.stpaul.mn.us>;
StThomasArenaEAW@ci.stpaul.mn.us <StThomasArenaEAW@ci.stpaul.mn.us>
Subject: Comments on St. Thomas Arena EAW..7/27/23

Please direct these comments to Mr. Joshua Williams:

I have several concerns already, and will likely have more as the process of planning for the new arena evolves..

Re. Deconstruction/preparation of the site:

How long will this part take, roughly?

Will this generate a significant increase in local traffic, with dump trucks, etc.?

Any how about dust and other air contaminants that may be generated when the existing buildings are demolished?

Re. Traffic after the arena has been built:

Please consider adding incentives for attendees of games, other events, etc. to:

- carpool
- Use electric or plug-in hybrid or hybrid vehicles
- add substantial outlets in the existing and new parking facilities to promote cleaner, decreased emission vehicle use
- IF buses are involved in transporting teams and/or spectators, ADD electric vehicles to your fleet

Re. environmental impacts:

- Please consider adding "green" or succulent-based roofs to the new structures, and/or include pollinator plants -> to help lighten the local environmental impact of this giant structure.
- Is any of the water/rain/snow run-off from the new arena and facilities going to be captured and re-used for: flushing toilets, watering gardens, etc.?

Thank you,

Eric Beck
2084 St. Clair Ave.
St. Paul

Josh Williams

From: Beth Brombach <bbrombach@comcast.net>
Sent: Monday, July 24, 2023 2:54 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: UST Arena comment on EAW

To Whom it May concern,

I have read the UST Environmental Assessment Worksheet on the proposed hockey arena project.

This worksheet, in no way makes me feel any better about this project. As a matter of fact, there are so many things that they are proposing, which completely contradict the St. Paul 2040 Comprehensive Plan. I am wondering how all of the things they are proposing can even be considered!

Here is what I completely object to about this assessment and I will be appalled if more work isn't done to clarify the real impact on this neighborhood and the environment.

How can a parking lot be put in the last green space of the south campus? This green space is in a conservation area. It runs along the Mississippi Flyway and is used by 75% of ALL North American migratory birds! The environmental impact of chopping down these old growth oaks and putting in a parking lot and road into an area that will directly runoff into the river, is an absolute travesty. It is also a conservation area that supports the endangered rusty patched bumblebee.

How can the loss of 76 mature trees easily be discounted, by saying that 50 little trees will be planted to replace them and even more outrageous is that they won't be replaced in the area where they have been chopped down?

What assurances does this neighborhood have that our streets, particularly Goodrich Ave, will not be used as an offsite parking lot and backdoor entrance to this project. I live on Goodrich and our street is already completely full of St. Thomas cars every school day and many event weekends.

The traffic assessment was limited and done at a time when there was a threat of a big snowstorm. Also, many students and professors were already leaving for Easter Break. This does not reflect the huge volume of cars that already use Cretin.

I don't see language that describes how any problems that will develop after an immense project like this occurs, will be monitored or actions enforced. By that, I mean, noise level of the buildings, traffic, parking, light pollution, misuse of neighborhood streets & air/dust pollution.

Why are more environmentally friendly alternatives not being used for backup generators to the arena? Diesel powered is what they are proposing. Is this the 1970's?

In conclusion, the scope of the UST proposed project will have such a lasting influence on anyone who lives in the surrounding neighborhood, that it is malfeasance to allow this to happen without more work to assess all of the cumulative effects that this project will have. The project that is being considered is too large and will have lasting negative environmental effects in this area. This does NOT go along with the 2040 Comprehensive Plan. As a matter of fact it does the opposite.

Beth and Bill Brombach
2214 GOODRICH AVE

Josh Williams

From: Ann Cohen <anncohen77@hotmail.com>
Sent: Tuesday, July 18, 2023 10:15 PM
To: *CI-StPaul_StThomasArena_EAW
Cc: Carol Walsh; James Fitzpatrick; johnrgla@msn.com
Subject: Comment on St. Thomas University arena project EAW
Attachments: UST EAW.docx

Dear Mr. Williams:

Please find attached a comment letter on the St. Thomas arena project EAW. Thank you in advance for your response to these comments.

Ann E. Cohen
John Glasenapp
1831 Ashland Avenue
St. Paul, MN 55104

James Fitzpatrick
Carol Walsh
1834 Laurel Avenue
St. Paul, MN 55104

July 18, 2023

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102

Via Email: StThomasArena_EAW@ci.stpaul.mn.us

Re: Environmental Assessment Worksheet (EAW) for the University of St. Thomas Multipurpose Arena (Lee and Penny Anderson Arena at the University of St. Thomas).

Dear Mr. Williams:

The Anderson Arena Environmental Assessment Worksheet (EAW) provides only an incomplete description of the environmental impacts of the proposed arena project and how those impacts will be mitigated. Further, the University of Saint Thomas (UST) has identified future phases of the project that, if implemented, have the potential for significant environmental impacts and are at variance with UST's sustainability strategic plan and the City of Saint Paul's own sustainability goals.¹ Finally, UST has failed to identify clear opportunities for making the new building a successful example of modern environmentally-conscious construction, achieving only "silver" LEED certification.² The City of St. Paul, as RGU, should hold UST, a wealthy academic institution, to the highest standards as part of the City's own pledge to ensure sustainable development.

1

<https://www.stpaul.gov/sites/default/files/Media%20Root/Mayor%27s%20Office/Saint%20Paul%20Climate%20Action%20%26%20Resilience%20Plan.pdf>. This plan states: "It is crucial to replace reliance on GHG-emitting fossil fuels with carbon-free energy sources to generate electricity, deliver heat, and power our vehicles and transportation systems."

²² To achieve LEED certification, a project earns points by adhering to prerequisites and credits that address carbon, energy, water, waste, transportation, materials, health and indoor environmental quality. Projects go through a verification and review process by GBCI and are awarded points that correspond to a level of LEED certification: Certified (40-49 points), Silver (50-59 points), Gold (60-79 points) and Platinum (80+ points).

Specific Comments

1. The EAW fails to provide any specifics or commitments regarding the measures UST will adopt to mitigate stormwater impacts related to the expansion of impervious surface and loss of vegetated landscaped areas. The EAW states (emphasis added):

Pdf 10. University of St. Thomas *is considering* ways to design landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff and mitigate for the urban heat island effect.

Pdf 11. University of St. Thomas *will investigate* ways to design the stormwater management facilities to minimize standing water and reduce the risk of flooding on the project site.

Pdf. 12. University of St. Thomas *is investigating* ways to minimize tree removals or replace more trees than are removed and include non-invasive native plants, resulting in a net gain of suitable habitat for local species including small mammals, insects, and birds. As it stands, the EAW predicts a net loss of 26 mature trees as the result of the project (pdf 13). Although UST plans to plant trees “elsewhere on campus,” locations are not identified making verification impossible.

Pdf 22. Instead of designing to reduce current direct stormwater discharge to the Mississippi, the Project appears to be designed to maintain current direct discharges via an existing stormwater tunnel. The project will thus continue impacts (erosion and sedimentation) related to rapid discharges of stormwater to the river instead of environmentally-preferable infiltration.

2. The EAW fails to clearly identify how the project will be powered. The EAW states that the project is being *considered* for connection to the campus microgrid for back-up power during outages or emergency events. Pdf 11. However, the EAW then states “The project may install a diesel generator to provide backup power to the arena *as well as up to four additional future diesel generators to feed the University of St. Thomas’ MicroGrid*. These generators would have diesel storage tanks at each generator or utilize one fuel storage tank for fuel supply. The project proposer will obtain the appropriate permits from the MPCA.” Pdf 27 (emphasis added). *Based on this language, it appears that one unstated potential purpose of the project will be to provide fossil fuel power for the campus rather than reduce fossil fuel dependency.* Moreover, the proposed generators will require underground or aboveground petroleum storage tanks, which will pose unavoidable issues with spills and leaks very close to the Mississippi River. The EAW contains no discussion whatsoever of the potential for installing solar panels on the structure to generate clean energy. The EAW contains no discussion of the potential to purchase

energy for the project from clean energy sources, such as a solar installation located elsewhere on campus.

3. The EAW fails to implement UST's sustainability strategic plan commitment to reduce vehicle traffic to the campus, admitting that the existing parking ramp will be expanded to accommodate increased parking as a second phase of this project, pending funding. Pdf 7. More parking will attract more individual-use vehicles. The EAW makes no mention of encouraging electric vehicle use of the facilities that will serve the project by installing charging stations. The potential for expanded parking, while helpful to reduce neighborhood impacts during high-use periods, is nevertheless environmentally detrimental. The EAW contains no discussion of how clean transportation could be used to bring fans or players to games.

4. The EAW identifies that the project will generate large quantities of construction debris that will require disposal or recycling, but fails to identify the use of techniques to "deconstruct" the existing buildings in a manner that will maximize environmentally superior *reuse* of materials. See, e.g., <https://www.rethos.org/sustainability>. Similarly, the EAW does not contain any detail regarding the impact of waste that will be generated at games and other events held at the building.

5. The EAW attaches a UST greenhouse gas analysis. However, this analysis is not specific to the project, generally dates from 2020, is manifestly incomplete, and amounts to "lip service" rather than a real commitment by UST to addressing the most significant environmental issue of the present time.

For example, there are numerous "?" entered rather than data on the following table (pdf 71):

Mobile Sources	
Do any vehicles fall within your organizational boundary? This can include cars, trucks, propane forklifts, aircraft, boats. Only vehicles owned or leased by your organization should be included here.	N
Refrigeration and Air Conditioning	
Do your facilities use refrigeration or air conditioning equipment?	?
Fire Suppression	
Do your facilities use chemical fire suppressants?	?
Purchased Gases	
Do you purchase any industrial gases for use in your business? These gases may be purchased for use in manufacturing, testing, or laboratories.	?
Waste Gases	
Are VOCs combusted in thermal oxidizers in your facilities?	?
Do you flare any gases on-site?	?
Electricity	
Does your inventory include facilities that use electricity?	Y
Steam	
Do you purchase steam for heating or cooling in your facilities?	?
Market-Based Emission Factors (entered on Electricity and or Steam tabs)	

Similarly, the following information is largely missing, other than the admission that UST does not purchase any “offsets” for the greenhouse gases it produces (pdf 72):

Business Travel	Yes or No?
Do your employees travel for business using transportation other than owned or leased vehicles (e.g., commercial airline flights, rental cars, trains)?	?
Employee Commuting	
Do your employees commute to work in personal vehicles or use public transportation?	?
Product Transport	
Do you hire another company to transport products or other materials to or from your facilities?	?
Waste Generated in Operations	
Do you generate waste that is disposed of in a facility owned by another organization?	Y
Offsets	
Do you purchase greenhouse gas offsets?	N

The “proposed scenario” section dated January 2023 is also manifestly inaccurate, noting, for example, that natural gas and #2 fuel oil are used but providing fuel consumption figures solely for natural gas. This is unacceptable.

The project-specific greenhouse gas analysis is, as noted above regarding other aspects of the proposed project, entirely nonspecific with regard to mitigation strategies that will be incorporated into the project. The EAW states only that “[t]he following design strategies and other sustainability measures *are being considered* for the proposed development to reduce emissions” rather than identifying particular project commitments, such as the use of on-site photovoltaics. Pdf 36-7. While it is likely that UST will incorporate *some* of the identified mitigation features into the project, it is impossible to review the true impact of the project based on UST’s “consideration” rather than “commitment.”

Conclusion

The City of St. Paul should not approve a negative declaration on this EAW because it is incomplete and inaccurate. The EAW identifies impacts that have the potential to be significant, but fails to provide an adequate description of the mitigation measures that will be implemented. The EAW also identifies potential phased actions associated with this project – such as increased individual vehicle parking and diesel-powered electricity generation – that are contrary to City of Saint Paul and UST strategic sustainability plans and that constitute likely future significant environmental impacts from this project or its future phases.

Under Minn. R. 4410.1700, subp. 2a:

If the RGU determines that information necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could be reasonably obtained, the RGU shall either:

A. make a positive declaration and include within the scope of the EIS appropriate studies to obtain the lacking information; or

B. postpone the decision on the need for an EIS, for not more than 30 days or such other period of time as agreed upon by the RGU and proposer, in order to obtain the lacking information. If the RGU postpones the decision, it shall provide written notice of its action, including a brief description of the lacking information, within five days to the project proposer, the EQB staff, and any person who submitted substantive comments on the EAW.

The City of St. Paul should require UST to produce information regarding how it will mitigate the impacts of this project and its likely future phases, rather than providing a “negative declaration” based on UST’s “vague statements of good intentions.” UST should be held to the highest standards for the production of information supporting documents of this nature because it has the capacity to collect, analyze and produce accurate and complete information. The City should ensure that this EAW is accurate

and complete before it is approved, or should order UST to prepare an Environmental Impact Statement.

Sincerely,

Ann E. Cohen
John Glasenapp
1831 Ashland Avenue
Saint Paul, MN 55104

James Fitzpatrick
Carol Walsh
1834 Laurel Avenue
Saint Paul, MN 55104

Josh Williams

From: David Ziebarth <davidziebarth@icloud.com>
Sent: Thursday, July 27, 2023 9:37 AM
To: *CI-StPaul_StThomasArena_EAW
Subject: EAW
Attachments: I have many concerns about the clarity of the UST arena EAW.docx

I have many concerns about the clarity of the UST arena EAW, but will limit the number for readability. I have read, researched terms, and annotated the document over the course of the past weeks, and am still left with@@@@@

1. In the introduction, in the very first paragraph, it is stated "other events...high school/youth sports, and conventions may also be held at the venue." On p. 19. It is stated "conventions, career fairs, etc. are often hosted on the North Campus." Will they be moved to the flagship Anderson Arena?

UST representative Amy McDonough told participants at a MGCC HLU meeting "We aren't building this to have it stand empty".

I find it hard to fathom that an institution as well organized as UST doesn't have specifics on what these "other events" will be. Those of us who have been involved in high school athletics have seen the large number of attendees at legacy games, conference tournaments and consolation rounds, bringing in hundreds or thousands of people from outside the immediate area. Throughout the document, references are made to the shortage of parking. These vague "other events" could be significant and needed to be addressed as to their impact on traffic and parking.

2. Regarding the effects of this large arena on traffic and safety of pedestrians and drivers, on p. 10, Appendix D, it is stated that on Cretin Ave. "Left turn movements and time-of-day-on-street parking were observed to cause abrupt lane changes and friction along the corridor." Cretin Ave is already congested (reference p. 10, Appendix D). Adding a predicted number of up to 3784 "passenger vehicle trips (p. 24, Appendix D) on the roadway will only add to this friction. Long wait times at lights, even longer waits from residential streets without lights ("During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 13 to 30 minutes." p. 38, Appendix D) are expected to occur as a result of the proposed arena. It is difficult to see how this predicted and predictable effect on Cretin Ave., intersecting residential streets, and pedestrians who attempt to cross this already busy road is acceptable, particularly when the city comp plan emphasizes the commitment of the city to the safety of pedestrians and bikers. Idling cars will also add pollutants and Greenhouse gases, another effect not fitting with the com plan's commitments to city residents.

3. Parking will be a huge issue. The EAW has laid out numerous deficits in parking spaces from a shortage of 40 to a shortage of 742 (Table 13, p. 28, Appendix D and p. 34, Appendix D). This is taking into account the assumption that many people will walk up to 0.5 mi to attend. The document states that it is "good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional 5 to 15%" (p.17, Appendix D) in order to reduce cars driving around looking for spots to park (again, safety and Greenhouse gas emissions are an issue). This best practice is obviously not being followed.

The EAW suggests that the excess cars will use "public parking" in the neighborhood but doesn't identify where that is. Those of us who live here know it is nonexistent.

36 hockey games that are now played at the hockey arena in Mendota heights will move the South Campus. They will be played mostly on Fri. and Sat. nights (Fig. 6, Table 7, p. 20, Appendix D), adding congestion, traffic, and parking requirements.

4. Because the "other events" are not identified, the hours of operation aren't either. This is important information for analyzing the effects of this proposal on the neighborhood and should be included in a comprehensive EAW.

5. The document states that the Summit Ave./South Campus intersection is "expected to be modified to better accommodate" (p. 14, Appendix D) the buses and delivery vehicles that will use the roadway on the west side of the arena. That space is already constricted. The seminary grounds, grotto, and historic chapel are all located in this area. Access of these large vehicle to the relocated Lot O seems difficult without further removal of buildings in the future, particularly during the winter with snow accumulation. This should be addressed in the EAW. The modifications should also have described.

6. Possible mitigation strategies include scheduling more games on weeknights, overflow parking on the South Athletic Fields (which would seem to void guarantees on the integrity of the artificial turf fields), expanding the APF (which the documents states "may not" be in compliance with the CUP- shouldn't we know this?- and would add to queuing as even more cars would enter and exit the ramp onto Cretin Ave.), and constructing a parking lot on the corner of Goodrich and the River Blvd which would result in taking down even more old oak trees along the Mississippi Flyway (p. 36, Appendix D).

7. The visual effects are said to not be "adverse". We have not seen what this 70' building will look like from the sides and back, and the visual effects could be extremely "adverse".

I could go on and on. The EAW is a lengthy document filled with charts, tables and data. But, it leaves many issues unresolved, with the suggestion (p. 35, Appendix D) further study could be done after completion of construction. I would suggest that it will be too late at that point. This should trigger an EIS.

Sincerely, Colleen Crenshaw

Josh Williams

From: KATHLEEN DEMING <kajadevin8@gmail.com>
Sent: Friday, July 21, 2023 7:03 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: Baseball Field

Hello~ Please DO NOT ALLOW St. Thomas U. to build a ball field at Highland Bridge (or to acquire another square foot of property anywhere off campus) UNLESS they are willing to pay the full value of property tax.

Any further thinning of our property tax base is going to further cost us property-tax payers, and citizens in this town are drowning in taxes.

I'm living below the poverty line, and if I had the use of my tax money, I could afford to have done some of the badly needed repairs on my 102-year-old house.

I believe that all church-affiliated colleges should have to pay tax on their acreage that is NOT PHYSICALLY OCCUPIED by their church or chapel.

I don't use trash service as I still share with a neighbor, yet had to go begging for assistance to pay for medication. BEfore the city in 1984 broke the back of the private Recycling Unlimited, which provided recycling throughout the city - with the exception of one last small area which was being planned for, recycling was FREE. Now we get charged for it. SHAME! SHAME! SHAME! There are limits to citizens' budgets. There should be limits to the city's.

STOP eroding the tax base! Stop charging us for things we don't use!

Kathleen Deming
1562 Goodrich Ave.; 55105

Memo

To: Josh Williams
From: Meg Grove
cc: Mitra Jalali
Date: 7/21/2023
Re: Questions, comments, requests for clarification on St. Thomas EAW

I have read through the Environmental Assessment Worksheet associated with St. Thomas' proposed multi-use complex, and have some questions and requests for clarification:

- 1) Project Description: The EAW says that "Vehicular access to the facility will consist of loading zones via an access drive on the western boundary. Please describe. What are assurances that Goodrich Avenue will not become the offsite parking lot and backdoor entrance to the project both during construction and operations?"
- 2) Project Description: Expansion of the Anderson Parking Ramp is mentioned as a "potential improvement in the Traffic Impact Analysis," though nothing is planned or funded "at this time." Considering St. Thomas' goal of carbon neutrality by 2035, and the City's Comprehensive Plan goals of minimizing traffic, why is this even on the table? Why would something that only encourages driving be a good idea? Also, based on discussions with City and project consultant staff at the 7/12 public meeting, assumptions used to calculate traffic at the ramp seem to be best case scenarios. What about when the weather isn't optimal? What about when vehicles break down or collide in and around the ramp? Explain how long wait times – whether under optimal or suboptimal conditions – won't result in lots of idling vehicles, and environmentally harmful emissions in this heavily residential area? With so much emphasis on through put of vehicles, it is difficult to see how the ramp log jams are consistent with St. Thomas' carbon neutrality goals, or with the City's 2040 Comprehensive Plan Resiliency goals (reducing carbon emissions, improving environmental sustainability), and Urban Design (limit stand alone parking uses, and encouraging private landowners to create/maintain green infrastructure).
- 3) Climate Adaption and Resilience: Continuing to build in an urban setting will exacerbate the Urban Heat Island. The EAW acknowledges that the area is "susceptible to extreme heat." How does this comport with St. Thomas' carbon neutrality goal, and with the City's Comprehensive Plan's Resilience and Urban Design goals?
- 4) Cover Types: UST says it will remove 76 mature trees to accommodate the complex, and that it will plant 50 new trees around the area. Also, "...St. Thomas has plans for at least 26 trees to be planted elsewhere on campus, outside of the EAW site area..." We heard at the 7/12 meeting from the project consultant that St. Thomas is "committed" to replacing the lost trees, one-for-one. New trees will take decades to become true replacements for the ones to be removed, which seems antithetical to carbon neutrality and Comprehensive Plan

goals. How can this be a reasonable answer to the EAW question? Also, “has plans for” and is “committed to” are not very reassuring. This seems to leave room for St. Thomas to change its mind. Who holds them accountable to their plans and commitments? How does this response support the 2040 Comprehensive Plan Urban Design goals (promote high-quality urban design that supports...a healthy environment, and enhances the public realm; encouraging ... private landowners...to create and maintain privately owned public space (POPS) and green infrastructure...)?

It seems convenient for UST to say it will put other trees elsewhere, just not on the South Campus site. Why would replacing the lost 26 trees to be placed outside of the EAW area be counted as a mitigation for purposes of this EAW? In fact, if UST wants to use the other parts of its campus to take up slack on any issue, doesn't that argue for a broader EIS?

- 5) Land Use: Saint Paul has not yet adopted the new rules of the MRCCA. I am sure the City Planning Commission is aware of the inconsistent application of the CA-River Towns and Crossings District. Why does UST property receive this designation while the Saint Paul Seminary remains zoned a River Neighborhood? Furthermore, the property bordered by Cretin, Goodrich, Mississippi River Boulevard, Exeter, and Otis Avenues is located entirely within the MRCCA and is designated further as a Primary Conservation Area (PCA) under three categories: Bluff Impact Zone, Significant Existing Vegetative Stands, and Unstable Soils and Bedrock. The PCA designation is meant “to ensure that they are given priority consideration for protection.” All these considerations which have been in effect for almost 50 years by Governor’s Executive Order 79-19 appear to be ignored in the EAW.

I understand that the City does not count parapets and rooftop mechanical equipment toward the overall building height. What I don’t understand is why that is allowable. Could it be that difficult to design the building to completely meets height limits?

- 6) Contamination/Hazardous Materials/Wastes: UST says it "may install a diesel generator to provide backup power to the arena as well as up to four additional future generators to feed the [school's] MicroGrid." Why would this be necessary? Instead of backup generators, what about batteries to store the power gained from the solar panels on various buildings on campus? Seems that burning diesel would be a step backward in terms of carbon neutrality and of the City’s 2040 Comprehensive Plan.
- 7) Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features): The area could be habitat for the endangered Rusty Patched Bumblebee (which is the Minnesota State Bee), according to the EAW, but isn't because it is already "disturbed." However, there are efforts all around us to restore habitat. How is this response aligned with the City’s 2040 Comprehensive Plan Urban Design goals, especially around promoting ‘high quality urban design that supports ...a healthy environment and enhances the public realm’ and ‘visible green infrastructure landscape features, such as rain gardens...?’

- 8) Visual: The EAW says the project 'will conform with the City's regulations for building height...Adverse visual impacts are not anticipated.' Who defines what is "adverse?" What happens if they occur? Who monitors? Who corrects?
- 9) Air - Dust and Odors: The EAW says, "The construction and operation of the project are not expected to generate objectionable odors." Objectionable by whose standards? Is anyone asking the people who live around the area? Is anyone planning how to monitor during construction and after the building opens? What if there are problems? Who is empowered take complaints or required to take some kind of action?
- 10) Greenhouse Gas Emissions/Carbon Footprint: The EAW lists "design strategies and other sustainability measures being considered for the proposed development to reduce emissions." *Considered?* Maybe considered, then tossed aside? Who is responsible for monitoring and ongoing mitigation/enforcement if there are problems?
- 11) Noise: In the Operational Noise section, the EAW says "The proposed project will potentially contribute to the existing campus noise. Further noise evaluation will be completed as design progresses..." This response seems inadequate. It supports what many neighbors fear because we've experienced it before: build first and worry about noise later - and only if someone brings it up. Later in that paragraph, the EAW says, "If the facility exceeds noise regulations, the project proposer will work with the city to identify potential mitigation options." Those of us who've lived here a long time recall when the Frey Science Building went operational. Switching on the massive exhaust fans on top of the building produced unbearably loud noise. It wasn't until more than a year after neighbors lodged numerous complained that the school finally added sound muffling to the fans. The EAW has also overlooked the noise generated by additional traffic generated by the project. Residents of the neighborhood have already experienced significant traffic noise increases resulting from the Grand/Cretin intersection modification and from the Highland Bridge development.

We get noise – we live in an urban area. Please explain how so much additional noise generated by one neighbor must be the price the rest of us pay, particularly when the project seems to be incongruent with St Thomas' and the City's stated goals and values (carbon neutrality, 2040 Comprehensive Plan Urban Design, Resiliency, and Community Health focus areas).

- 12) Transportation: - The EAW says that "Maximum basketball events may occur one to two times per year. Maximum hockey events are expected to occur two to four times per year..." One wonders - why build at all? As we've heard from St. Thomas' own staff, "you don't build for Easter Sunday." However, we've also heard from St. Thomas staff that they plan to market use of the complex all year round, yet the environmental impact of those events - whatever they may be - are not included in this EAW, which makes it incomplete. Why not make some assumptions and put those into the calculations?

The Traffic Study's traffic volume data depends on traffic counts for March 30, 2023, just before a major snowstorm (March 31-April 1). Given how that storm was forecasted and hyped, we believe the volume of traffic was significantly lower than normal. The Parking study also discounted the snowstorm as a factor. I strongly suggest updated parking and traffic studies to truly reflect what is/will happen.

Continuing on the topic of the traffic study, it includes mention of putting a surface lot on Mississippi River Boulevard as a way to mitigate parking issues. This cannot be acceptable! Certainly THAT would trigger more scrutiny because of the MRCC.

13) Cumulative Potential Effects: The EAW asks UST to "Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes..." The EAW says "The University of St. Thomas does not have any board approved plans for new building construction at the Saint Paul campus. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any future building projects to contribute to the understanding of the cumulative potential effects." Neighbors have heard this numerous times over the years, always some version of "there are no plans." UST has stated that it is in an arms race to attract students from the dwindling age cohort, and that moving to Division 1 athletics is a marketing strategy. The EAW should include some assumptions about future development since even UST indicates it will occur. They have already said development of the East and West blocks of Grand Avenue is next. The constant drip-drip-drip of development while hiding behind statements about not having any "board approved plans" insults the neighborhood and the City. Why not treat all of St. Thomas as it really is – a single site - and require a more thorough study of the impacts of its building program with a comprehensive Environmental Impact Statement?

As a final note, while I understand that a public meeting on the St. Thomas EAW was not required, it did not seem as though the 7/12/23 had much substance. In fact, it seemed designed less to illuminate the neighbors and other interested parties, and more to stifle disagreement. More a check off on the to-do list than true engagement. St. Paul claims to be proud of citizen involvement, but failed miserably in this case.

Meg Grove
2198 Goodrich Avenue
St. Paul MN 55105
(651)295-8296
Meg.grove@hotmail.com

Josh Williams

From: Joan Haan <jimbhaan@outlook.com>
Sent: Thursday, July 27, 2023 9:15 PM
To: *Cl-StPaul_StThomasArena_EAW
Subject: Hockey/basketball arena

Dear Mr. Williams

I live at 2249 Summit Ave. I am a biker and walker and driver from my home to other locations. What I want is what is best for the community and my neighborhood. I appreciate UST's desire to be a good neighbor and share the arena as a resource beyond UST events. UST is part of our community as are the residents. I believe safety, environment, and traffic are mutual concerns.

I recently had a lengthy conversation with Jerome Benner, the new neighborhood liaison. He is interested in finding ways to make traffic and routing more amiable/ less negatively impacting neighborhoods.

Some ideas:

- Signage, cones, directing traffic
- Encouraging walking, biking, carpooling as pro environmental action
- Email Schedule of events in advance to neighbors so we can plan accordingly – text alerts for those who opt in .
...
- Expansion (higher levels) of the exiting Anderson parking structure – that will need variance from the city and may be the best solution for additional parking vs. neighborhood parking and traffic.

Please take these and other creative ideas into consideration. We neighbors want safe access to our neighborhood and for those who visit for sporting events. We love our neighborhood and want to maintain that beauty of this place where we are so privileged to live!

Thank you,
Joan Haan

Sent from [Mail](#) for Windows

Josh Williams

From: Doua Yang
Sent: Monday, July 24, 2023 1:16 PM
To: Laura Halferty
Cc: *CI-StPaul_StThomasArena_EAW
Subject: RE: New arena at St. Thomas

Hi Laura,

We appreciate your email. Both CM Jalali and I were at the public meeting two weeks ago at UST. We were able to listen and learn about neighbor concerns and comments. Parking concerns is consistent with what we've heard in months prior, and we will continue to work with UST and City staff to find the best solutions.

I have included Josh Williams from City of Saint Paul to ensure your comment is recorded in the EAW public comment period.

Thank you,



SAINT PAUL
MINNESOTA

Doua Yang-Hernandez
Legislative Aide
Councilmember Mitra Jalali, Ward 4
City of Saint Paul
651.266.8641
www.StPaul.gov

From: Laura Halferty <halfpint1763@gmail.com>
Sent: Monday, July 24, 2023 11:24 AM
To: #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: New arena at St. Thomas

Think Before You Click: This email originated outside our organization.

Hi Mitra,

I am emailing you regarding the planned arena at Saint Thomas University. I have lived in the neighborhood for about 15 years and have been supportive of Saint Thomas, it's variance requests, and it's building projects. However, I am very concerned that the planning for the new hockey arena does not adequately address parking. I feel very strongly that parking solutions need to be identified and approved before the arena is built. We already have parking issues in the neighborhood and the city has not consistently enforced the permits in place to alleviate the dearth of parking.

In addition, existing traffic on Cretin has resulted in numerous accidents and fatalities. Additional traffic (especially at high speeds) on river road is concerning as well given all the bicycle and foot traffic. With a little planning and funding, the arena project can be a success for both Saint Thomas and the neighborhood. Thank you for your help in making sure this new development is holistically planned.

Sincerely,

Laura Halferty
2187 Summit Ave.
St. Paul, MN 55105
612-508-6376

Sent from my iPhone

VIRGINIA ANNE HOUSUM
2229 FAIRMOUNT AVENUE
SAINT PAUL, MINNESOTA 55105

July 24, 2023

TO THE CITY OF SAINT PAUL PLANNING OFFICE:

As a neighbor who will be immediately affected by the Saint Thomas multipurpose arena to be built on the south campus of the University of Saint Thomas (“UST”), I wish to comment in response to the environmental assessment worksheet (“EAW”) prepared by Kimley Horn, as a consultant to UST. Preliminarily, I would like to mention that even though I have attended three meetings concerning the proposed arena, many things in the EAW were shocking to me when I read it, and have left me with the impression that the extent of the damage the arena will do to my neighborhood in Macalester Groveland is far greater than was represented by UST to the attendees at public meetings. Unlike UST, most of the attendees at the meetings have been Saint Paul taxpayers. For that reason, I think our comments should be given great weight, as UST again endeavours to impose on its neighbors.

Flawed process

As several people have pointed out at the public meetings, UST failed to engage with its neighbors effectively and has pushed forward with its proposed arena, without taking into account its effect on the area. The attendance at the public meetings has been sparse, and calls to neighbors has disclosed that many of them are unaware of the arena proposal. This is occurring despite UST stating explicitly at the June 12 meeting that the quality of the neighborhood is a valuable amenity to UST’s efforts to recruit new students. I am certain that had UST engaged in a real public process, neighbors would have developed ideas to mitigate the damage the arena will cause to the neighborhood if it is built as disclosed in the EAW. Thus, the very quality of the neighborhood benefitting UST is being jeopardized by UST’s failure to engage appropriately with its neighbors. As I have tried to talk to my neighbors about the arena, many of them have not heard of the proposal or, if they have heard of it, believe that UST is a neighborhood bully who gets its way, no matter what. The arena proposal could have been improved with neighborhood input. In particular, the traffic study contains many errors and people who are in the neighborhood day in, day out (in contrast to Kimley Horn’s one day traffic count on a snowy Saturday in March) could have told Kimley Horn of the real traffic situation. Instead, UST has embarked on a premature EAW, and forced those of its neighbors who have learned of the arena proposal to respond to it, without having the opportunity to provide their input. So much for UST trying to be a good neighbor.

Uncertainties expressed in EAW create concerns about the real extent of the project

The EAW repeatedly references that UST “is considering” ways to improve the project. *See* for example, the description of landscaping to be used to limit adverse climate effects (page 7); UST “is investigating” ways to minimize tree removals (page 9); and the lengthy descriptions of parking mitigation strategies (pages 34 through 40). Implicit in these sections is the only

conclusion that a reader can draw: UST is rushing through this EAW process without making commitments on exactly what it is going to do. The whole EAW is premised on vague promises of improvements which may or may not come to fruition. The neighborhood's experience with UST has been that it often does not follow through on ambiguous aspirational goals. As a result, neighbors will not be satisfied unless actual detailed and enforceable commitments by UST are put in writing.

Errors and/or misrepresentations in EAW

The EAW contains representations which are inconsistent with information provided orally by UST at the public meetings. These inconsistencies cause me to doubt the entire EAW process, because, as noted above, it is not possible at this time, given the EAW, to understand fully and completely how extensive the damage will be in the neighborhood from the arena. Among others, the misrepresentations include the following:

1. The EAW states that “no impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat...no impacts to the nearby Mississippi River are expected” (EAW, page 27). Somehow, Kimley Horn failed to recognize that the Mississippi River is the most important flyway for migratory birds in the country and is protected by international treaties. The decline in bird populations has been documented over and over again over the last 20 years. Birds do not simply fly over the river; but use nearby areas as resting spots and places to replenish themselves. Anyone who has spent any time in the immediate area of the river could explain that the number of migrating birds changes during the spring and fall. Of great importance, the implications for bird populations easily could be mitigated if UST retained an appropriate consultant familiar with bird populations and mitigation methods, such as bird friendly glass in the arena, and care and attention given to lighting in the arena, which could reduce bird collisions with the building. The building should not be permitted to go forward without a commitment by UST to undertake ALL necessary steps to mitigate adverse effects on bird populations.
2. UST has stated at public meetings that approximately 75 trees on the site will be replaced by the arena, but that these are young, small trees in parking lots. However, a visual inventory of the site disclosed that there are dozens of mature trees, including trees approximately 50 years old, which would be lost. UST has pledged that a very large cottonwood tree on the west side of the site near the top of the ravine going down to the Mississippi River will be saved, but there are large trees in the area between the seminary and Cretin Hall which will be lost as well. It is incumbent on UST to agree in writing to replace the trees which will be destroyed, on a ratio of at

least 4:1, to compensate for the loss of the air filtration and carbon sequestration trees provide. Further, the new trees should be planted on the south campus, where the greatest damage from the new arena is going to occur.

3. Of great importance in the MacGroveland neighborhood and Kings Maplewood subarea, UST has explicitly stated at public meetings that the wooded area at the northeast corner of Goodrich Avenue and Mississippi River Boulevard would **not** be affected by the construction of the arena. However, in the EAW, in a discussion on mitigation for lost parking from the project, Kimley Horn recommends construction of a surface parking lot in the southwest quadrant adjacent to Mississippi River Boulevard (page 36). This parklike setting contains over two dozen mature trees, and should be viewed as a public amenity, as it is used every day, all year round, by many residents of the City of Saint Paul. UST MUST commit in writing to leave this parcel, of approximately 5 acres, in the same condition it is now, and to solve the parking problem of its own making elsewhere. The city must bear in mind that UST owns the entire two block area bounded by Summit Avenue, Cleveland Avenue, Grand Avenue, and Cretin Avenue. It has a small parking lot on the northwest corner of Grand and Cleveland. UST can solve its parking problem by building a structure on that site or elsewhere on that block, but the approximate five acre plot at Goodrich and Mississippi River Boulevard must be off the table now and in the future. As indicated above, only a detailed and enforceable written instrument will satisfy this requirement.

Traffic implications

The tenor of the EAW is addressed to the laudable goal of minimizing collisions between pedestrians and cars. But that is not the only traffic issue which must be addressed. Even without pedestrian accidents, the arena project is going to have a very significant deleterious effect on traffic along Cretin Avenue, especially at the intersections with Goodrich, Fairmount, Princeton, and Sargent Avenues, north of St Clair. The defects in the EAW I have identified in the discussion of traffic implications of the arena include the following:

1. The EAW is fatally flawed in failing to consider the future growth in traffic on Cretin Avenue from the continuing buildout of the Highland Bridge development. Beyond the issue of the number of crashes discussed by the EAW, Cretin Avenue has become a crowded speedway from Highland Bridge to I-94. Mitigation is desperately needed, before there are pedestrian collisions along Cretin Avenue. At the very least, a pedestrian activated blinking light or roundabout will need to be installed at Goodrich and Cretin. Other traffic calming will also be needed, perhaps by finding a way to narrow Cretin Avenue.

2. I travel north on Cretin Avenue and turn east on Marshall about three mornings a week, between 7 AM and 9 AM. Notwithstanding the conclusion in the EAW that the queues on westbound Marshall Avenue only develop in the afternoon (page 10), cars are usually backed up on westbound Marshall Avenue for about two blocks in the morning. The EAW does not even consider the traffic impact westbound at that time of day.
3. The traffic study done on March 31, during a snowstorm, and on Saturday April 1 (page 11) is not representative of traffic on Cretin Avenue. Traffic always starts later on Saturdays, and after a snowstorm was doubtless delayed even longer. This appears to be a material skewing of the data to back into UST's desired conclusion that the parking problem it is foisting onto its neighbors is not significant. However, there are a significant number of drivers speeding up and down Cretin Avenue at all times of the day and night, and attention to pedestrian crosswalks is inconsistent. The City should not rely on the shallow analysis prepared by Kimley Horn in the EAW, but should undertake its own traffic study and develop a meaningful plan to reduce traffic on Cretin, or effectuate calming of the traffic on that arterial.
4. The EAW reports a loss of 264 parking spaces on the UST campus from the arena project, without taking into account significant events, like commencement, basketball games, and hockey games. The EAW fails to mention that UST already has asked the city to eliminate the parking spaces along the east side of Cretin Avenue north of Summit Avenue, so the actual shortfall in spaces is probably closer to 285. This is another example of UST holding back crucial information needed for a meaningful EAW. The non-event solutions proposed by UST will be difficult to measure, and UST needs to develop not only accountability for these proposed steps, but a definite plan for what it will do in a Plan B if those steps fail. UST needs to solve its parking problem on its own property, and not by creating congestion and inconvenience for its neighbors. At the very least, in those neighboring areas where parking is only by permits issued to residents, the hours of parking restrictions must be extended throughout the times of anticipated events, i.e. probably to midnight.
5. The assumptions made in the EAW about parking demand during events (a shortfall of up to 740 spaces), as well as the number of events, are unrealistic (EAW, page 28). In addition, the projections in the EAW about the time it will take to exit the Anderson Parking Facility ("APF") are inconsistent with my experience at other parking facilities in the city. I feel certain that when the APF is full, it will take over an hour to vacate the APF, especially in light of the traffic light at Cretin and Grand

Avenues, and the likelihood of pedestrians crossing both streets at the exact same time.

Conclusions

The inadequate effort made by UST to inform its neighbors of the intended multiuse facility, and the meaningless “public” process to date alone indicate the inadequacy of the EAW. UST has wasted an opportunity to engage its neighbors in developing creative solutions to the consequences of its decision to proceed with a new multiuse facility on the south campus. I doubt that anyone contests the right of UST to build a new facility on the campus, but UST should not be permitted to encumber the neighborhood unnecessarily, as it proposes. Throughout the EAW, UST minimizes the numerous detrimental impacts the arena will have in the area, only some of which have been addressed in this comment. UST should convene a group of neighbors who will work with it to help it find meaningful mitigation opportunities. In the EAW, Kimley Horn fails to suggest mitigation strategies which do anything other than dump the problems which will be created by the arena on UST’s immediate neighbors. With respect to the heavily impacted intersection of Goodrich and Cretin, all that it offers is a one sentence comment: “The number of pedestrian crossings in this location will be heavily dependent on where event patrons are parking” (page 33). This alone proves the inadequacy of the EAW.

As a resident of Saint Paul, I expect the City to require UST to engage with its neighbors to provide meaningful opportunities for mitigation, especially on the issues of retention of the open space at the northwest corner of Goodrich and Mississippi River Boulevard, effects on the Mississippi River flyway, parking, and the dangerous conditions on Cretin and Cleveland Avenues. To allow an entity which does not contribute to the City by paying taxes to impose on the City as suggested by the self-serving EAW submitted by UST does a serious disservice to the body politic. UST needs to negotiate in good faith with representatives of its neighbors and agree in writing to enforceable conditions to the construction of a multiuse facility. The EAW should be withdrawn until such a process is completed.

Respectfully submitted,

Virginia Anne Housum
Ginny.Housum@umb.com
Telephone: 612-384-6452

Josh Williams

From: Daniel Kennedy <dan@lakestreetlaw.com>
Sent: Wednesday, July 26, 2023 5:43 PM
To: *CI-StPaul_StThomasArena_EAW
Cc: Jerome Benner; mgcc@macgrove.org; Leah Timberlake Sullivan
Subject: Comments on St. Thomas Multipurpose Arena EAW
Attachments: EAW Analysis.pdf

Dear Mr. Williams,

Attached please find my comments on the Environmental Assessment Worksheet for the Lee and Penny Anderson Arena at the University of St. Thomas. Please e-mail me with any questions.

Sincerely,

Daniel L. M. Kennedy
Kennedy & Cain PLLC
3400 E. Lake St., Suite 200
Minneapolis, MN 55406
(612) 728-8080
dan@lakestreetlaw.com

University of St. Thomas

Lee and Penny Anderson Multipurpose Arena

Analysis of St. Thomas's Environmental Assessment Worksheet

Prepared By:
Daniel L. M. Kennedy, BA JD MBA
Kennedy & Cain PLLC
3400 East Lake Street, Suite 200
Minneapolis, MN 55406

This analysis of the Environmental Assessment Worksheet (“EAW”) issued in conjunction with the planning for the Lee and Penny Anderson Multipurpose Arena examines the EAW’s assumptions, specifies topics that the EAW did not address, and concludes that the arena presents unacceptable changes in access, parking, and traffic flow. Acceptable alternatives exist for the identified problems with access and parking, but not for traffic flow. The analysis concludes that the arena would create unacceptable environmental impacts that are great enough that the construction of the arena should not be permitted as currently designed.

The placement of a sports arena in a residential neighborhood naturally raises questions about traffic, parking, access, and headlights. These are all addressed in this analysis.

A. Four Key Aspects of Arena Plan

1. The proposed site plan truncates the South Campus’s main access route from Grand Avenue, so that 100% of traffic directly to the arena and 100% of the trucks and other vehicles driving to and from Grace Hall, O’Shaughnessy Science Hall, and Schoenecker Hall would be redirected from Cretin Avenue to Summit Avenue.
3. In addition to spectators’ cars¹, the arena will be serviced by team buses, spectator buses, vending supply trucks, and dumpster haulers; their sole access to the arena would be to travel on Summit Avenue. All of those vehicles weigh more than 10,000 pounds. Summit Avenue is a registered historic district and a designated parkway with a maximum vehicle weight of 9,000 pounds.
2. St. Thomas is not adding any parking for this 5,500-seat arena. Instead, the arena will displace 264 parking stalls without replacing any of them. The EAW’s solution is that thousands of spectators will park on surrounding residential streets.
4. The EAW acknowledges that the level of service for traffic on Cretin Avenue would not be acceptable at multiple intersections during arena events.

B. Requirements for a 5,500-seat arena

Any analysis of the environmental impact of a Division I sports arena should discuss the basic requirements for such an arena to function successfully. Without including the totality of those who need to access the arena, any discussion would be misleading and could vastly understate the impact on the arena’s environment. This is a fundamental flaw of the EAW, which does not include such a discussion. Using comparisons to other arenas (adjusted for different seating capacities, where appropriate), the nominal requirements for a 4,000-5,500 seat hockey and basketball arena would be as follows:

¹ The term “car” is meant to include other passenger vehicles such as SUVs and light trucks.

	# per game (range of 3,000-5,500 spectators)	Gross Vehicle Weight
Bus for visiting team*	1	20,000
Buses for fans from visiting team, youth groups, etc. (assume 500 fans, coach capacity of 50, school bus capacity is 65)	4-11	20,000
Food truck (snack bar: hot dogs, popcorn, etc.) (Sysco/US Foods)*	1	30,000
Beverage vendor truck (Coca-Cola/Pepsi)*	1	22,000
Franchise food truck (e.g., Subway, Domino's)*	4	15,000
Dumpster hauler, trash*	1	28,000
Dumpster hauler, recycling*	1	28,000
Cars (using EAW's 2.75 fans per car)	900-1,650	6,000 or less
Pedestrians (assume 500 students from north campus, remainder walking from cars parking in neighborhood)	2,750-5,000	N/A

* This number will apply to all games, regardless of attendance.

It is important to note that a 5,500-seat arena does not cap attendance at 5,500 spectators. St. Thomas currently plays basketball in Schoenecker Arena, which has 5,000 seats. Attendance ranges as high as 6,500 spectators (presumably with many standing). EAW, App. D at 19.

Also significant is that “average attendance” and “typical schedule” figures in the EAW are based on past data, not upcoming schedules. For example, the St. Thomas men’s hockey team hosted home games in 2022-23 against Michigan Tech, Bemidji State, Bowling Green, Northern Michigan, and Lake Superior. EAW, App. D at 22. None of these teams would have a sizable fan base in the Twin Cities. In 2023-24, the schedule includes home games against St. Cloud State, Minnesota State-Mankato, and University of Minnesota-Duluth, each closer to St. Paul and with established hockey programs. Attendance numbers will surely grow next season.

C. Compounding Traffic

The site plan calls for changes in the traffic patterns inside the South Campus, most notably the elimination of direct access from Cretin Avenue (at Grand Avenue) to every part of the South Campus other than Owens Science Hall and Anderson Parking Ramp. Other buildings on the South Campus (Anderson Arena, Grace Hall, Biz Refectory, Brady Education Center, O’Shaughnessy Science Hall, and the new

Schoenecker Hall) will have their access to Grand Avenue eliminated. Access will instead be through the Summit Entrance. All cars, delivery vans, service vehicles, garbage trucks, and other vehicles that entered from Cretin would be required to drive down Summit Avenue and into the Summit Entrance.



Fig. 1: Grace Hall



Fig. 2: O'Shaughnessy Science Hall and Schoenecker Hall

D. Access Problems

Buses: The EAW does not discuss bus access, but St. Thomas officials have indicated that buses accessing the arena will drive west on Summit Avenue to the existing entrance of the St. Paul Seminary ("Summit Entrance"), then drive south through the Seminary to a new road that will bring them past the west side of the arena to a south entrance to the arena, where passengers will unload. The distance from the arena to Cretin Avenue is approximately 250 feet. Instead, the buses will drive 0.5 miles to Summit Avenue and then east to Cretin Avenue.

Problems:

Parking: The site plan includes space for one or two buses to park next to the arena. That is not sufficient for the number of team and fan buses that will need to park. Because they will not be able to park at the arena, they will have to exit the South Campus, leaving out the Summit Entrance and re-entering Summit Avenue. Many will likely park (illegally, due to full-time permit parking restrictions) on westbound Summit Avenue west of the median break to the Summit Entrance. There — or any other place in the neighborhood they can find parking — they will idle to keep the bus warm during the winter hockey and basketball games. This would be true no matter where fans loaded and unloaded, because the site plan lacks bus parking.

Access: Buses will enter the South Campus to unload, leave due to lack of parking, re-enter to load, and leave again with passengers. For each game, buses will traverse Summit Avenue four times. With 5 to 12 total buses required for each game, the burden on Summit Avenue will be tremendous: noise, exhaust, and the danger of having up to 48 total bus trips on Summit in just a few hours. This would be repeated game after game. Even if the burden were one fourth this much, it would be far too great.



Fig. 3: Buses illegally driving west on Summit Avenue, then through Summit Entrance. Photo taken from residential property.

Parkway Restrictions: The St. Paul City Council has designated Summit Avenue a “parkway.” Vehicles driving on parkways may not exceed 9,000 pounds. St. Paul Leg. Code §§145.02, 170.07. All of the various trucks and buses accessing the arena

through the Summit Entrance vastly exceed the parkway limit of 9,000 pounds. Their use of the parkway is contrary to the City’s aim to achieve “the maximum enjoyment by all persons and protect[] the natural resources therein.” St. Paul Leg. Code §170.10.

Headlight Effect: Because basketball and hockey are winter sports, the headlights of trucks and buses leaving through the Summit Entrance will be on and aimed straight at residential properties on the north side of Summit Avenue. Below is an illustration of the effects of the headlights (taken from south side of Summit Avenue at Summit Entrance using headlights from a 10-year-old Ford sedan):



Fig. 4. Headlights on house (low beams)



Fig. 5. Headlights on house (high beams)

The effect of up to 24 buses leaving the Summit Entrance *per game* would add to the impact described above. Adding the food, beverage, trash and recycling trucks would further compound the effect. The site plan also includes 38 parking spaces for cars, meaning within a few hours for every game, more than 60 vehicles would aim their headlights directly across the street at residential properties (the figure shows the house directly across from the Summit Entrance, but as the vehicles turn onto Summit Avenue, their light would be shared with the neighboring residences as well).

Trucks: The site plan shows that the sole access to the arena is through the Summit Entrance, meaning that food vending trucks (Sysco/US Foods), franchise food supply trucks (Subway/Domino’s), beverage trucks (Coca-Cola/Pepsi, perhaps beer suppliers), and dumpster haulers for trash and recycling would all travel west on Summit Avenue past houses, enter through the Summit Entrance, drive through the Seminary and around the arena, then exit in the reverse direction, back to Summit and past the same houses. At approximately eight vehicles per game, that constitutes 16 trips down Summit Avenue.

Other Uses: The EAW focuses on Division I sporting events, but St. Thomas intends to use the arena for far more than that. University convocations and commencements, high school and youth sports, and conventions are also planned for the arena. EAW,

Appendix D, at 2. Those events will expand the six-month basketball/hockey schedule (late September to early March) to fill the calendar year. The conventions alone would bring higher truck traffic to Summit Avenue than even the largest of sporting events due to the number of individual presenters who will be setting up booths and displays.

Parkway Restrictions: All of the trucks needed to service the arena far exceed the 9,000 pound-limit set forth in the St. Paul Legislative Code.

Headlight Effect: All of the trucks would produce the same headlight effect, adding 8 more trips to the 24 times that buses leave the Summit Entrance - *per game*.

Cars: The EAW states that 38 surface parking spaces will be available next to the arena. Their only access will be through the Summit Entrance. They are permitted to drive on the parkway, but that does not diminish the fact that 38 vehicles will drive each way to the arena, adding 38 pairs of headlights to the headlight effect and 76 total trips past the houses on Summit Avenue - *per game*.

Available Alternative:

To comply with the St. Paul Legislative Code, St. Thomas could easily route vehicles bound for the South Campus through the Cretin/Grand entrance that has been the main entrance to the Seminary since its founding. Unlike Summit Avenue, parallel Grand Avenue *is* a truck route. St. Paul Leg. Code §146.04. The Grand Entrance is just 250 feet from the arena. The Summit Entrance could be limited to access to the St. Paul Seminary.

E. Parking Problems

Currently, St. Thomas does not provide nearly enough off-street parking for its needs. The spill-over effect is great, with the on-street parking surrounding the campus fully occupied at most hours of the day. The university's tradition of spilling over its geographical limits has spawned permit-parking zones adjacent to campus. As students and staff park outside those zones, the ring of permit-parking zones has increased in diameter around the campus. St. Thomas's modest supply of parking simply does not meet its current needs due to commuting students and staff. This parking shortage will increase, as St. Thomas administrators have indicated a desire to increase total enrollment by 10% in the upcoming years.

In proposing its arena with a capacity of 5,500, St. Thomas does not plan to add any off-street parking to its supply. Instead, it eliminates 264 spaces right at the arena site where they would be most needed. EAW at 35.

The EAW's solution is to have its spectators park in the surrounding residential neighborhood. A map of the permit parking zones shows the weaknesses of the permit parking zones, some of which require a permit only on weekdays. It is unlikely, however, that those zones would remain unchanged after spectators consistently fill

those streets with cars at the same times (Friday and Saturday nights) when the residents may wish to have visitors who need on-street parking. A restriction of the permit parking zones would leave St. Thomas with an arena that cannot rely on nearby on-street parking.

Available Alternative:

To provide parking for its arena, St. Thomas could expand its Anderson Parking Ramp laterally southward along Cretin Avenue. This would impact its existing softball and soccer fields, but softball is moving to the Highland Bridge development (the former Ford plant) and soccer games can be played on the football stadium as is done at many other post-secondary institutions such as nearby Macalester College. St. Thomas has the available land to solve the parking shortage it plans to create, rather than to thrust it onto the neighborhood and inspire more restrictive permit parking zones.

F. Traffic Problems

Cars conflicting with trucks. The food, beverage, trash, and other trucks that service the arena would not be arriving or departing at the same time as spectator vehicles.

Cars conflicting with buses. Visiting team buses would arrive earlier than spectators and would not conflict. Spectator buses could enter through the Grand Entrance, but would not enter the Anderson Parking Ramp and would be diverted around the arena to the south side.

Cars conflicting with pedestrians. If the EAW is correct, students residing on campus will walk to the arena, crossing Cretin Avenue at the same time that arena traffic is at its highest before and after games. The EAW discusses extended signals for arena-bound traffic and traffic officers to halt traffic, but arena traffic will run north-south at the same time that students will need to travel east-west across Cretin. This inherent and dangerous conflict could be solved by a pedestrian tunnel underneath Cretin Avenue, but has no other obvious solution if an arena is built.

Cars conflicting with cars. The EAW's solution to pre-game and post-game traffic issues is to have non-arena traffic stop so that arena traffic may swiftly flow onto Cretin and Grand Avenues. This would be accomplished by altering the signal patterns, such as adding a dedicated left-turn light to northbound Cretin and keeping the light green for traffic leaving the Anderson Parking Ramp; this could be done at Grand Avenue and Summit Avenue to allow cars to leave the South Campus unhindered. The result would be that non-arena traffic on Summit, Grand, and Cretin would be halted or slowed for a period of 20-30 minutes before and after each game. The EAW admits that the level of service (LOS) at nearby intersections will be F (the lowest rating), and that F is an unacceptable LOS. Specifically, the EAW's traffic study that the LOS will go from its current A to an F at Cretin and Goodrich, from B to F at Cretin and Grand, and from A to D at Cretin and Summit.

Cars conflicting with bicycles. The EAW mentions bicycle options several times. Because basketball and hockey are winter sports, the EAW is misguided in relying on any spectators arriving by bicycle. The site plan does not include any bicycle parking.

Public Transportation: The EAW identifies three public transit options for the arena (Routes 21, 63, and 87). The only consistent service to the University of St. Thomas in 2024 will be Route 63 on Grand Avenue. Route 87 on Cleveland Avenue has service only once per hour on weekends, and Route 21 will no longer run from Lake Street to the St. Thomas campus after it is replaced by the B Line rapid transit service. Consistent public transit will only be possible from the east down Grand Avenue but buses will not be able to travel as scheduled because traffic will be halted for cars driving to or from the arena.

No Available Alternative:

Unlike the access and parking issues discussed above, there is no reasonable way that thousands of vehicles can travel to and from the arena without creating significant conflicts with existing traffic patterns. If this were a once-a-year phenomenon such as graduation, the occasional conflict could be acceptable. St. Thomas proposes to hold numerous events each week, and St. Thomas acknowledges that the results will produce an unacceptable level of service on the surrounding streets.

St. Thomas has not committed to implement any mitigation strategy, and the few that are discussed in the EAW (e.g., bicycle ridership in winter, city bus service) would not have a significant impact.

G. Impact on Surrounding Historic District

The portion of Summit Avenue adjacent to St. Thomas is part of the Summit Avenue West Heritage Preservation District, which is on the National Register of Historic Places. Eight of the eleven houses on Summit Avenue north of the South Campus, and five of their garages, were identified as contributing structures to the historic district in the historic district registration form.

As noted above, Summit Avenue itself is one of 14 parkways is the City of St. Paul listed in St. Paul Legislative Code, Section 145.02, entitled “Parkways where trucks are prohibited.” Summit Avenue originally had a 100-foot right of way, but the property owners on both sides of Summit Avenue donated 50 feet of their frontage from Lexington Parkway to the Mississippi River to create a 200-foot right of way and allow space for the medians that exist today. It can perhaps be assumed that the donors did not wish to bring truck traffic 50 feet closer to the homes.

At the same time that St. Thomas is planning to send dozens of buses and trucks into a historic district, the university plans to demolish Cretin Hall to create space for an arena. Architect Cass Gilbert, who designed three state capitals (including Minnesota’s), the U.S. Supreme Court building, and other notable structures, designed

three residence halls for the St. Paul Seminary: Grace Hall, Loras Hall, and Cretin Hall. St. Thomas recently demolished Loras Hall to make way for Schoenecker Hall, currently under construction. Cretin Hall was erected in 1894 and transferred in 1987 to St. Thomas for use as a dormitory. It houses 90 students on five levels. The EAW identifies Cretin Hall as eligible for nomination as a historic structure.

Conclusion

The EAW demonstrates that the Anderson arena as planned would have a significant negative effect on the South Campus's environment. The access routes have been designed without consideration for the statutory vehicular weight limitations of Summit Avenue, the planned use of an historic district for all heavy vehicles includes not just the arena but also other major buildings on campus, and vehicle headlights from a dozens of trucks, buses, and cars would have a negatively impact neighboring residential properties. The fact that St. Thomas lacks current capacity yet intends to eliminate 264 spaces rather than increase its off-street parking supply to meet the new demand will inevitably thrust the university's parking problem onto the surrounding residents. The degradation of the traffic level of services from A and B to D and F will significantly hinder non-arena traffic before and after games. While St. Thomas may perceive that an on-campus arena will be a benefit to the university, the negative environmental effects of the arena proposal described in the EAW greatly outweigh that benefit.

Josh Williams

From: Wellens, Ann <AWellens@Taftlaw.com>
Sent: Thursday, July 27, 2023 3:08 PM
To: *CI-StPaul_StThomasArena_EAW
Cc: Manderscheid, Marc
Subject: Comments on the Environmental Assessment Worksheet Dated June 2023, Concerning the Proposed University of St. Thomas Multipurpose Arena - Sent on behalf of Marc J Manderscheid
Attachments: Comments on the Environmental Assessment Worksheet Dated June 2023, Concerning the Proposed University of St. Thomas Multipurpose Arena.pdf



Ann M. Wellens

Legal Assistant

AWellens@Taftlaw.com

Dir: 612.977.8622

Tel: 612.977.8400 | **Fax:** 612.977.8650

2200 IDS Center

80 South 8th Street

Minneapolis, MN 55402-2157

taftlaw.com

This message may contain information that is attorney-client privileged, attorney work product or otherwise confidential. If you are not an intended recipient, use and disclosure of this message are prohibited. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

**COMMENTS ON THE ENVIRONMENTAL ASSESSMENT WORKSHEET DATED
JUNE 2023, CONCERNING THE PROPOSED UNIVERSITY OF ST. THOMAS
MULTIPURPOSE ARENA**

Submitted by Marc J Manderscheid

I. THE CITY'S EAW FAILS TO PROPERLY DEFINE THE "PROJECT" AND EVEN TO CONSIDER "CUMULATIVE IMPACT" AND THE "CUMULATIVE POTENTIAL EFFECTS" OF ONGOING AND PROPOSED DEVELOPMENT ON THE UNIVERSITY'S SOUTH CAMPUS

The June 2023 St. Thomas EAW prepared on behalf of the City of Saint Paul violates Minnesota law by improperly defining the proposed "project" and in failing to properly consider the "cumulative potential effects" of the connected actions and phased actions which are a part of the University's redevelopment of its South Campus.

The purpose of an Environmental Assessment Worksheet ("EAW") is to provide the information needed to properly assess the environmental impact of a proposed project, and to determine whether a more detailed Environmental Impact Statement ("EIS") is required under Minnesota law. Minn. R. 4410.1000, subp. 1. Because the City's EAW improperly and incorrectly defines the "Project," the full information necessary to conduct a proper environmental review is necessarily missing, and the EAW fails in its essential purpose to provide accurate and relevant information concerning how the South Campus redevelopment clearly has the potential for significant environmental effects.

Background Information Concerning the Recent Ongoing Development of the University's South Campus and the New South Campus Quadrangle

In 1987, the University purchased approximately 23 acres of land and multiple older buildings from the St. Paul Seminary, which area is presently referred to as the South Campus. The University's initial new construction in the South Campus was to the southwest of the Cretin and Summit Avenues intersection, when it built the Frey Science and Engineering Center,

consisting of Owens Hall and O'Shaughnessy Hall. The second major new construction was of a parking ramp to replace parking spaces lost because the University constructed new buildings across the Summit and Cretin Avenue intersection on the North Campus.

In February 2009, St. Thomas opened the Anderson Parking Facility, a five level, 724-space parking ramp, on the southwest corner of Cretin and Grand Avenue South. The ramp replaces parking spaces that will be lost in Lot H (402 spaces) to make way for the proposed Anderson Student Center and in Lot E (71 spaces) that were lost because of the construction of the Anderson Athletic and Recreation Complex.

See December 2009 EAW for Anderson Student Center and Anderson Athletic and Recreation Complex, p. 4; *see* pp. 21-22.

When the Anderson Parking Facility was built, the City's parking regulations required that parking for an athletic stadium must be located within 600 feet of the sports facility. The Anderson Parking Facility was located more than the required distance away from O'Shaughnessy Stadium, thus causing the University in April 2010 to request a modification of its Special Condition Use Permit, so that it could avoid being required to comply with the City's parking regulations. St. Thomas subsequently amended its development plans to include a total of 118 underground parking spaces in the Anderson Student Center.

The point of mentioning the above history is to make clear that the Anderson Parking Facility on the South Campus was never intended solely to supply parking spaces to the South Campus, but it was primarily constructed to serve as the principal parking facility for the buildings and facilities on the southwest corner of the North Campus, including the new Anderson Student Center. The Anderson Parking Facility has also been used to provide parking for events on the top floor of the Anderson Student Center, which has a large meeting and conference space with table seating for up to 794 persons and 860 seats auditorium style. This space is often rented to outside groups for meetings, conferences, and social events held on Friday and Saturday evenings.

Persons attending these events are directed by the University to park in the Anderson Parking Facility on the South Campus.

As far back as 2010, only one year after the Anderson Parking Facility opened, there was ongoing discussion between St. Thomas, the City, and the community about the desirability of adding an additional two floors to the Anderson Parking Facility, in order to meet the substantially increased parking demand caused by all of the new construction on the North Campus.

In 2015, the University constructed the multi-level Facilities and Design Center adjacent to the Anderson Parking Facility, facing the Grand Avenue extension.

In November 2016, the University's Board of Trustees unanimously approved a new 10-year Campus Master Plan, which it developed with the campus planning firm of Hastings + Chivetta. The Master Plan stated that future projects for the South Campus were to include a new 137,000 square foot science and engineering building on the north side of the Grand Avenue extension and adding two more levels on the top of the Anderson Parking Facility, which would require a height modification in the 1990 Special Condition Use Permit, which allows only a 60-foot building in that location. *See* November 2016 Campus Master Plan and Press Release describing the Plan.

In June, 2019, the University submitted to the City of St. Paul a "Site Plan Review Application" for a project which was described as "New Permanent Parking Lot West of Loras Hall." The application identified the Project architect as "Kimley-Horn" and the contractor as "Ryan Companies U.S., Inc." This project a "New permanent parking lot west of Loras Hall and second, alley repaving and garage removals along the west block alley." On the South Campus, the plan was to build a new 58-stall code-compliant parking lot, in the location now occupied by the Schoenecker Center, for a net parking gain of 38 parking spaces. This project was to start

construction in August, 2019, but was withdrawn shortly after the permit materials were submitted to the City.

The hasty withdrawing by the University of its proposal to increase surface parking spaces on the South Campus is explained by the University's announcement just a few months later that it would be constructing the Schoenecker Center, which would combine instruction in science, technology, engineering, arts, and math into one large new building. The Schoenecker Center, presently under construction, consists of a five level, 130,000 square foot structure connected by skyway to the existing Frey Engineering and Science complex. In addition to constructing the new building, the Schoenecker Center development includes replacing multiple surface parking lots on the north side of the Grand Avenue extension with a new "South Campus Quadrangle." This Quadrangle would replicate on the South Campus some of the same green space, landscaping and sidewalks now present on the several quads located on the North Campus. In order to construct the new Schoenecker Center and Quad, the University last year eliminated approximately 127 surface parking spaces. There is no parking in the new Schoenecker Center and the University has not replaced any of the 127 recently removed parking spaces.

The City's EAW Fails to Comply With the Mandatory Standards for EAW Preparation

Correctly identifying and defining the "project" in an EAW is critical to gathering all of the necessary information for analyzing the possible detrimental effects and potential environmental impacts. Among the defined terms in the EAW regulations is a "Phased Action" which "means two or more projects to be undertaken by the same proposer that . . . will have environmental effects on the same geographic area; and are substantially certain to be undertaken sequentially over a limited period of time." Minnesota Rules, Part 4410.0200, Subp. 60. A similar concept is set forth in the definition for "Connected Actions." *Id.* at Subp. 9(c).

Minn. Rule 4410.1000, Subp. 4, provides: “Connected actions and phased actions. Multiple projects and multiple stages of a single project that are connected actions or phased actions must be considered in total when determining the need for an EAW, preparing the EAW, and determining the need for an EIS.” The June 2023 EAW fails this mandatory standard.

One of the most important reasons for correctly defining a project in the first instance is to identify the “cumulative impact” and “cumulative potential effects” of activities where not all of the construction is done pursuant to the same construction contract.

“Cumulative impact” means the impact on the environment that results from incremental effects of the project in addition to other past, present, and reasonably foreseeable future projects regardless of what person undertakes the other projects. Cumulative impacts can result individually minor but collectively significant projects taking place over a period of time.

“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 Significant cumulative potential effects can result from individually minor projects taking place over a period of time. In analyzing the contributions of past projects to cumulative potential effects, it is sufficient to consider the current aggregate effects of past actions.

See Minn. R. 4410.0200, subp. 11 and 11a.

The above defined terms from the EAW regulations identify the critical nature of properly defining the “project” in the first instance. Here, the City’s EAW, prepared by St. Thomas’s retained design professionals, fails to properly identify the project, and “other projects” in the environmentally relevant area, thus both misstating and understating the environmental effects which will arise because of the University’s concentrated new construction in and around its new South Campus Quadrangle.

The EAW's Response to Question 6, the "Project Description" is Inaccurate and Incomplete

The EAW's answers to Item 6 of the EAW Form are inaccurate, incomplete, and misleading. Item 6.b. requires "a complete description of the proposed project and related new construction, including infrastructure needs." Because the EAW fails to fully describe all of the redevelopment which has already taken place around the South Campus Quadrangle area, it fails to identify the physical changes that have already occurred and are continuing to occur in the area immediately adjacent to the proposed new arena. Subsection d. to Item 6 requires an answer to the question "Are future stages of this development, including development on any other property, planned or likely to happen?" The EAW references only the Anderson Parking Facility, and fails to include the Schoenecker Center and South Campus Quadrangle.

In response to Question 6.b., the EAW asks the reader to see "Figure 3" for existing site conditions. A quick glance at Figure 3 shows the immediate adjacency to the new arena of the ongoing construction of the Schoenecker Center and the construction yet to begin to create the South Campus Quadrangle. Look at the recent aerial photographs! *See* EAW Figures 3, 8, and 9. There is obviously additional construction presently going on today immediately adjacent to the location of the new arena. The new South Campus Quadrangle, which will be expanded from what is depicted on the "Existing Conditions Plan · 05.10.2023" will cover land adjacent to both the Schoenecker Center and the new arena, eliminating the Grand Avenue extension, and expanding the size of the Quadrangle to include land on both sides of the former driveway.

Perhaps the EAW's failure to define the "project" as including the Schoenecker Center building and the adjacent the South Campus Quadrangle is because the contractor for the Schoenecker Center is McGough Construction Co., LLC, while the "Proposer" and contractor for the Anderson Arena is Ryan Companies. It makes no difference in EAW preparation if two

different contractors are building on adjacent property having the same owner. There is only one University of St. Thomas.

The University has often lauded the interconnected nature of its South Campus redevelopment. At the June 5, 2023 UST/Community meeting hosted by UST President Vischer, it was explained by a UST speaker that “the Arena completes the fourth side of the South Quadrangle.” On July 24, 2023, UST issued a press released entitled: “Schoenecker Center Transforms South Campus.”

The EAW rules require that all of the related physical changes to the immediate physical environment be taken into account when preparing an EAW. The June 2023 EAW fails to do so. The failure to include and describe all of the phased and connected construction in the June 2023 EAW report violates the Minnesota Environmental Policy Act and renders the conclusions in the June 2023 EAW incomplete, inaccurate, and unreliable. *See Pope County Mothers v. Minn. Pollution Control Agency*, 594 N.W.2d 233, 237 (Minn. Ct. App., 1999), where the Court held the MPCA did not “engage in reasoned decision making when it failed to consider the cumulative environmental effects” of “multiple individual sites.”

Item 6.e. of the EAW questionnaire asks: “Are future stages of this development, including development on any other property, planned or likely to happen?” If yes, then the EAW regulations require a description of future stages, relationship to the present project, timeline, and plans for environmental review.” *Id.* The EAW appropriately answers the first question “yes.” The only other project listed in the EAW, however, is: “The Anderson Parking Facility is an existing parking ramp that was designed for future expansion of two additional floors. The expansion is discussed as a potential improvement in the Traffic Impact Analysis (Appendix D.); however, it is not currently planned or funded at this time.”

So what? The University has been discussing the addition of two additional floors to the Anderson Parking Facility since 2010; it was specifically included as an upcoming project in the 2016 Campus Master Plan approved by the University Board of Trustees. The question asked in preparing an EAW is not whether “construction plans” have been drawn or capital funding has been raised. The question asked in an EAW, is whether there are future stages of the development which are “likely to happen?” With new construction of one-half million square feet of new buildings already underway or planned, all within the same geographic area, the two additional stories on the Anderson Parking Facility are indeed “likely to happen.” Whether the University considers a project as not being “real” until its full funding has been authorized by the Board of Trustees, is a completely separate question from whether the environmental impact of new development “likely to happen” must be included within an EAW analysis of potentially harmful environmental effects likely to occur within a limited land area.

Item 21, “Cumulative Potential Effects” Fails to Properly Quote the Rule, Fails to Analyze the Issue, and Fails to Meaningfully Analyze the Cumulative Potential Effects of the Construction Bordering the University’s South Campus Quadrangle

The language in the first sentence of the definition for “Cumulative potential effects” requires an analysis of “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” Minn. Rule 4410.0200, Subp. 11a. Thus, it is only logical that “other projects” include past, present, and future projects, and that all of the projects together must be analyzed and understood to properly identify all cumulative potential effects. This interpretation of the first sentence is further supported by the final clause of the next sentence, which requires that the EAW analysis also “includ[e] future projects actually planned or for which a basis of expectation has been laid” The word “including” in the Rule makes clear that not only are past and present projects to be analyzed, but also “future projects.”

“Future projects” does not limit the cumulative effects analysis to cover only future projects, as the City’s EAW suggests in the response to Items 6 and 21.

The text in the June 2023 EAW omits any reference to the next sentence in the regulatory definition of Cumulative Potential Effects, which states: “Significant cumulative potential effects can result from individually minor projects taking place over a period of time.” Minn. Rule 4410.0200, subp. 11a. The rules require that adjacent changes in land use must be included in considering cumulative potential effects. The next sentence further supports a broad interpretation of the types of construction projects to be included in a proper analysis: “In analyzing the contributions of past projects to cumulative potential effects, it is sufficient to consider the current aggregate effects of past actions.” *Id.* Thus, the full text of Rule 4410.0200, subpart 11.a. makes it absolutely imperative that a proper analysis of cumulative potential effects must include all past, present, and future actions. The June 2023 EAW’s failure to even identify, yet alone analyze the effects of all of the past and present projects, *i.e.*, the Schoenecker Center construction, the plan for the South Campus Quadrangle, and the planned expansion of the Anderson Parking Facility, must be taken into account now in the EAW analysis.

Subparagraph b. of Item 21 asserts that “The University of St. Thomas does not have any board approved plans for new building construction at the St. Paul Campus.” This is erroneous. The University has “plans.” In November 2016, the St. Thomas Board of Trustees unanimously approved a “10-year St. Paul Campus Master Plan.” On the South Campus, Item 11 of the Master Plan specifically calls for a “New Academic Building [for] Science & Engineering [with a size of] 137,000 SF.” Item 13 of the Plan clearly states: “Expand Anderson Parking Facility (two levels) • 300 parking spaces.”

The new science and engineering building called for in the 2016 Master Plan is presently under construction. The plan to expand the Anderson Parking Facility, by adding two levels on top of the existing ramp, can be accurately analyzed now because the location, dimensions, and floor plan for the new construction will be the same as it is on the level existing below the proposed two new levels. It is simply wrong to suggest, as is done in the EAW, that “there is not sufficiently detailed information about any future building projects to contribute to the understanding of cumulative potential effects.”

The City of St. Paul Must Reject the June 2023 EAW for its Failure to Meet the Requirements of the Minnesota Environmental Policy Act and the Applicable Rules

An outline of a City’s responsibility to appropriately consider “potential impacts” and “cumulative potential effects” is set forth in the recent case of *In Re City of Cohasset’s Decision on the Need for an Environmental Impact Statement for the Proposed Frontier Project*, 985 N.W. 2d 370 (Minn. Ct. App. 2023). As the Appeals Court noted, and the law and rules make clear, an environmental impact statement is required “if the proposed project has the potential for significant environmental effects.” 985 N.W. 2d at 378. The Appeals Court reversed the city’s decision and remanded for the city to issue a new decision on the need for an EIS, after concluding that the City’s decision not to require a proper environmental analysis was “unsupported by substantial evidence.” *Id.* Here, if the City of St. Paul does not require the preparation of a proper EAW with full and accurate information, or order the preparation of an Environmental Impact Statement, the City will simply cause delay and uncertainty to the University’s timetable. *See Pope County Mothers*, 594 N.W.2d at 238.

II. THE TRANSPORTATION STUDY FAILS TO ACCOUNT FOR NUMEROUS FACTORS, THUS SERIOUSLY UNDERESTIMATING ALMOST CERTAIN FUTURE PARKING PROBLEMS

The Transportation Study by SFR fails to account for numerous issues with existing insufficient parking and fails to appropriately analyze future parking problems. The Transportation Study needs to be redone with the correct base data, in order to develop a real-world view of the parking shortage and the resulting transportation congestion likely to arise because of the University's proposed new construction.

Just as the body of the EAW report fails to identify the "cumulative impact" and the "cumulative potential effects" of the development already occurring on the University's South Campus, the parking study is similarly flawed. For instance, the parking study fails even to discuss the new Schoenecker Center, which is presently under construction and will open in 2024. The 130,000 square foot Schoenecker Center will create greater parking demand by bringing additional students, faculty, staff, visitors, and programs to the South Campus Quadrangle. Those persons are going to need to park somewhere.

The site of the Schoenecker Center used to provide 127 parking spaces for use by South Campus visitors. The construction of the Schoenecker Center eliminated those spaces, as well as creating increased evening demand, such as will arise from the music auditorium in the new building. Similarly, the parking demand analysis fails to account for the hundreds of persons attending programs, events, and dinners on the third floor of the Anderson Student Center. I have often driven down Cretin Avenue on weekend evenings and seen many persons dressed in suits and fine dresses walking along Cretin from the Anderson Parking Facility to the Anderson Student Center. None of the first two events were even taken into account in the parking demand analysis by SRF; all three occurring simultaneously was never considered. It is easy to imagine that on a Friday night there will be a basketball game in the new arena, a music concert in the Schoenecker

Center, and a non-profit fundraising event on the third floor of the Student Center. Where are all these people going to park?

On page 16, the parking analysis identifies that the construction of the arena alone “is expected to result in the net loss of approximately 265 parking spaces.” But, this statement fails to account for the 127 recently eliminated spaces lost because of the construction of the Schoenecker Center and the north portion of the new South Campus Quadrangle.¹ Thus, the total parking loss from the current and proposed construction is at least 392 spaces, almost one-half again more than the 265 that was analyzed in the parking study.

Table 12, “Available Parking Supply Before Events” suggests that on Friday and Saturday nights there will be between 185 and 214 parking spaces available on nearby public streets for persons attending events in the new arena. Figure 9 identifies a potential number of street parking spaces. My experience from living nearly adjacent to the University’s campus for over 25 years is that there are seldom significant numbers of parking spaces available on weekends along Summit and Grand Avenues when school is in session; students and their weekend guests make substantial use of the free parking available on those public streets and it can be difficult to even find any significant number of on-street parking spaces.

The University’s basketball and hockey games will be played in the late fall throughout the winter. During this same time period, it often snows in St. Paul. Sometimes the City declares snow emergencies. When the City declares snow emergencies, there will be no neighborhood parking available anywhere near the University. Moreover, as was the case this past winter, the City’s difficulty in clearing snow from curb to curb significantly restricts the number of on street

¹ There were actually 145 spaces north of the Grand Avenue Extension. 18 of these spaces were accessed directly from the Extension and may have been counted in SRF’s calculation. If not, the loss from Schoenecker Center and related construction is 145 spaces, not 127.

parking spaces which are available. The parking study fails to account for snow in St. Paul during the winter sports' seasons.

Figure 9, "Event Parking Supply," notes those residential blocks near the University in which the City Residential Permit Parking program is in place. The Study's Event Parking Demand analysis specifically notes, in footnote 3 that "nearby city permit parking restrictions are generally not in effect on Saturday," and thus assumes that all of the neighborhood streets will be available on weekends for arena parking. At the public forums which the University has hosted this year, UST's southern residential neighbors have made very clear their intentions to petition the City to extend the residential permit parking restrictions to include Saturdays and to extend the evening parking restrictions to 10:00 p.m. The University is very well aware of the neighborhood attitude on this issue. As a matter of fairness and equity, it is entirely inappropriate for the University to fail to spend the money necessary to construct parking facilities on its own campus, and thereby shift the burden of automobile storage to the surrounding neighborhoods, when the reason the demand exists is for persons attending University events.

The "Key takeaways from the event parking demand" suggest that for maximum basketball events there is expected to be "a deficit of approximately 330 to 740 spaces. These vehicles will likely utilize public parking in the neighborhood." See Page 28. The next paragraph provides: "Maximum hockey events are generally expected to be accommodated on campus. However, some vehicles may choose to park on public streets on the neighborhoods over parking in the Northeast Quadrant of the North Campus, especially on Saturdays when city permit parking restrictions are lifted." See p. 28. This acknowledgment illustrates one of the major elements of blindness in the Parking Study. When the University makes its campus parking spaces available, it charges a fee for parking. Parking on neighborhood streets is "free." A fact of life is that most

persons driving to events in the University's new arena would prefer free parking over pay parking. The Study fails even to discuss how this issue will impact parking demand and congestion in the neighborhood.

In the real world, patrons coming to the University to attend athletic events will likely be cruising the neighborhood looking for free parking spaces (even if signs restrict it, there will undoubtedly be persons parking in violation of the permit restrictions). There are substantial numbers of neighborhood residents who pay for their resident parking permits for their families and guests, such that there are often very limited open parking spaces available now on the neighborhood streets. The Parking Study fails to account for how the actions of drivers seeking "free" parking will increase congestion, delay traffic clearing, potentially create safety issues, and have negative and deleterious effects on the quality of life for the neighbors residing south of the University.

Again, the EAW identifies that during some events there "are expected to [be] a deficit of approximately 330 to 740 vehicles which will likely use public parking in the neighborhood." EAW, p. 36. Even this number is likely low as it is based on unrealistic assumptions (such as assuming patrons will be willing to pay to park in Tommie North, so that they can walk back across the entire campus late on winter evenings!). Because so many of the base assumptions used forecasting supply for and proposed mitigation are either unrealistic or unlikely to happen, the Transportation Study fails to provide sufficiently accurate information such that the true impact of the proposed arena is accurately set forth.

The EAW and SRF's Transportation Analysis fail to explain how shunting hundreds of cars into the nearby residential neighborhoods can possibly satisfy Policy LU-54 of the City's 2040 Comprehensive Plan, which seeks to:

Ensure institutional campuses are compatible with their surrounding neighborhoods by managing parking demand and supply, . . . minimizing traffic congestion, and providing for safe pedestrian and bicycle access.

The word “ensure” is often defined as “to secure or guarantee” and “to make sure or certain.” There is nothing “certain” about simply listing “possibilities” for mitigation, when the University has not indicated its willingness to implement mitigation activities.

When an RGU considers mitigation measures as offsetting the potential for significant environmental effects under Minn. R. 4410.1700, it may reasonably do so only if those measures are specific, targeted, and are certain to be able to mitigate the environmental effects.” 713 N.W.2d at 835. The EAW fails this test. The traffic study’s purported mitigation analysis is disjointed and fails to establish how or even if the possible ideas for mitigation will actually solve the parking and congestion problems likely to occur.

The Minnesota courts have concluded that an RGU may not rest its decision “on ‘mitigation’ that amounts to only ‘vague statements of good intentions.’” *Citizens Advocating Responsible Development vs. Kandiyohi Board of Commissioners*, 713 N.W. 2d 817, 822 (Minn. 2006). An RGU is simply not allowed to push off to the future the possible mitigation of environmental harm. “Under MEPA, an RGU must determine whether a given project has the potential for significant environmental effects before approving the project.” *Id.* at 835.

Parking Conclusion

In summary, what the University has done or is proposing with regard to parking on the South Campus is the following:

- Eliminate 392 parking spaces.
- Add one-half million square feet of new buildings with a 5,000 seat arena and new academic spaces.

- “No onsite parking is expected to be constructed in the redevelopment.”

When reduced to its stark essentials, this “conclusion” makes no sense.

III. THE CITY OF ST. PAUL SHOULD REJECT THE CURRENT EAW AND REQUIRE MORE AND BETTER STUDY

The City must reject the current EAW and at least require that a full and accurate EAW be prepared, which properly defines the project; identifies all of the negative potential environmental effects; and complies with Minnesota law. Or, the City could direct that an Environmental Impact Statement be prepared.

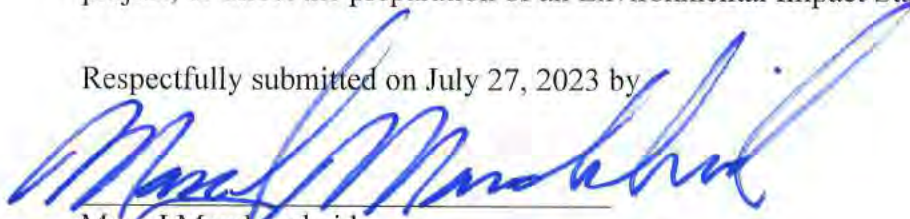
Kimley Horn and SRF have put the City of St. Paul into a difficult position. No doubt, the University of St. Thomas would like to be done with the environmental review as soon as possible. But, the Minnesota Environmental Policy Act and the Rules thereunder must be followed. As set forth above, the June 2023 EAW fails to properly define the project; fails to appropriately consider connected actions and phased actions; improperly minimizes the cumulative potential effects of all elements for the University’s South Campus Quadrangle and related construction. The parking and congestion analyses omit necessary information, and strongly suggest that the University’s acknowledged parking shortage should be solved by forcing the neighborhood to bear the negative consequences of insufficient parking on campus.

There is simply not enough accurate and complete information in the June 2023 EAW for the City to reasonably and appropriately analyze the potential environmental impacts of what the University is proposing. The standards for the City’s decision on whether there is a need for an EIS is set forth in Minn. R. 4410.1700. Subpart 2.a. provides that if there is insufficient information “necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could reasonably be obtained, the RGU shall

either “require an EIS to obtain the lacking information or postpone the decision on the need for an EIS, and grant an extension to allow time in order to obtain the lacking information.””

An RGU’s “decision will be deemed arbitrary and capricious if the agency “entirely failed to consider an important aspect of the problem, if it offered an explanation for the decision that runs counter to the evidence, or if the decision is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” *Trout Unlimited, Inc. vs. Minn. Dept. of Agriculture*, 528 N.W. 2d 903, 907 (Minn. App. 1995). The City should do the right thing and either require that a proper EAW be prepared, which fully analyzes all of the connected and phased actions and the cumulative potential effects of the University’s South Campus redevelopment project, or direct the preparation of an Environmental Impact Statement.

Respectfully submitted on July 27, 2023 by



Marc J Manderscheid
2136 Goodrich Avenue
St. Paul, MN 55105
marcmanderscheid@comcast.net

Josh Williams

From: Kathryn McGuire <mcguire.kathy56@gmail.com>
Sent: Thursday, July 27, 2023 1:52 PM
To: Josh Williams; *CI-StPaul_StThomasArena_EAW
Subject: Re: EAW for UST Arena Proposal
Attachments: EAW Public Comment, July 27, 2023.docx

> On Jul 27, 2023, at 1:50 PM, Kathryn McGuire <mcguire.kathy56@gmail.com> wrote:
>
> Dear Mr. Williams,
>
> Attached is my public comment regarding the UST EAW. Please confirm that you have received my
> Email and that my comments will be included in the public comments for this EAW.
>
> Thank you,
>
> Kathryn McGuire
> 1942 Glenhill Road
> Saint Paul, MN 55118
>

July 27, 2023

Mr. Josh Williams,

I request that the following comments be recorded with the public comments for the EAW-University of Saint Thomas (UST) multi-use arena proposal. The EAW contains several inaccuracies, incomplete information, and potential impacts that warrant further investigation. There is need for further and more intensive, environmental review of this project together with all development and expansion at UST.

Cumulative Potential Effects: Over the past 100 years, UST has undergone an inordinate amount of development and expansion, which has increased dramatically in the last 50 years. It is common knowledge that there will be further development beyond the multi-use complex currently under review. Regardless of whether or not plans have been board approved, UST representatives have openly stated that the east and west blocks will soon be developed and that all athletic facilities will be upgraded to meet best practice standards for Division I athletics. The EAW is not sufficient in assessing the broad impact that UST has imposed on the surrounding community. The cumulative potential effects of UST development should be assessed in total, rather than in a project-by-project, piecemeal fashion. An Environmental Impact Statement (EIS) might be a more appropriate means of assessment since the UST expansion and development has "significantly affected the quality of the human environment." (National Environmental Policy Act of 1969 NEPA)

Project Description: The project proposes a seating capacity of 5,500 people but no funding or approved plan for additional parking. This is an inadequate response to the problems identified in the Traffic Impact Analysis. Provisions for parking should be established during the planning phase, not as an afterthought.

Climate Adaption and Resilience: According to the Metropolitan Council's Extreme Heat Map, the location of the UST proposed project is "susceptible to extreme heat". Other communities, Hopkins, MN for example, use this information to mitigate heat island effect, and this is what Saint Paul should be doing. The UST proposed development would further contribute to the Urban Heat Island Effect, which is in direct conflict with the 2040 Comprehensive Plan policy goals and detrimental to the health and well-being of people. Further investigation is warranted.

Cover Types: The removal of 76 mature trees from the MRCCA would have an enormous environmental impact. The carbon absorption rate of trees accelerates as the trees age, and tall, old trees are carbon storehouses for the planet. Furthermore, when forests are cut down, the stored carbon is released into the atmosphere as carbon dioxide. This is in sharp contrast to UST's goals of carbon neutrality and the resiliency goals of the 2040 Comprehensive Plan. The EAW has not adequately assessed the environmental impact of removing 76 carbon storehouses and releasing that carbon dioxide into the atmosphere. These potential impacts warrant further investigation.

Cover Types: There is additional environmental impact as trees can reduce urban heat island effects by shading building surfaces, deflecting radiation from the sun, and releasing moisture into the atmosphere. The removal of 76 mature trees from the MRCCA is in sharp contrast to the resiliency goals of the 2040 Comprehensive Plan. The EAW has not adequately assessed the environmental impact of removing shade trees that reduce the Heat Island Effect. These potential impacts warrant further investigation.

Cover Types: UST proposes to plant new, young trees in other areas of the campus. It will take decades for young trees to achieve the environmental benefits of mature trees for carbon absorption and heat island reduction. Furthermore, planting 26 young trees elsewhere on campus does not mitigate the environmental impact within the MRCCA area which contains the South Campus. This proposed solution is useless as it is not within the project location.

Land Use: The EAW cites the 2040 Comprehensive Plan Land Use Goal 54 which is “to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.” How can UST and the EAW conclude that the proposed plan is in anyway consistent with these goals? Traffic congestion and pedestrian safety are already problematic due to the increased traffic on Cretin Avenue, and the added traffic will compound traffic congestion profoundly. The EAW fails to address this obvious contradiction to the 2040 Comprehensive Plan. Furthermore, the UST proposal is contradictory to goals of the Saint Paul Climate Action & Resiliency Plan and other policy goals of the 2040 Comp Plan including:

Goal #1. Economic and population growth focused around transit.

Goal #4. Strong connections to Mississippi River, parks, and trails

Goal #8. People centered urban design

Policy LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.

Policy LU-21. Identify, preserve, protect and, where possible, restore natural resources and habitat throughout the city with the following ordinances:

Policy LU-36. Promote neighborhood- serving commercial businesses within Urban Neighborhoods that are compatible with the character and scale of the existing residential development.

Policy LU-38. Direct the location of new secondary schools and post-secondary educational institutions along transit routes and bicycle and pedestrian networks to provide options for students and staff, and decrease traffic congestion in adjacent neighborhoods.

Policy HP-3. Pursue funding to evaluate, maintain, renovate and preserve City-owned eligible and potentially eligible property, and assist private owners to do the same.

Policy HP-12. Prioritize the retention of locally-designated/listed historic and cultural resources or those determined eligible for designation over demolition when evaluating projects that require or request City action, involvement or funding, or those of related development authorities.

Policy CA-2. Protect Primary Conservation Areas through planning, land use and land alteration regulations, and other tools.

Policy CA-3. Minimize impacts to PCAs from public and private development and land use activities.

Policy CA-5. Manage vegetation and conduct vegetation restoration consistent with park master plans and MRCCA requirements.

Policy CA-6. Promote the preservation and re-establishment of natural vegetation on privately-owned property.

Policy CA-7. Consider alternative design standards related to subdivision and development of land within the MRCCA, such as conservation design or transfer of development rights, in order to protect or restore PCAs.

Policy CA-9. Explore permanent protection measures (such as acquisition and conservation easements) to protect PCAs.

Land Use: The St. Paul City Council has not yet adopted the new rules of the MRCCA, nor are they required to adopt the new rules. To assume that this will be adopted is inaccurate. Furthermore, members of the City Council, Planning Commission, and DNR, are well aware of the inconsistencies and inaccuracies in the zoning assigned to the properties owned by UST and the Saint Paul Seminary. The EAW has portrayed inaccurate and incomplete information regarding the zoning of the MRCCA property, and the EAW has inaccurately portrayed the City Council's role and prerogative in this process.

Land Use: The property bordered by Cretin, Goodrich, Exeter, and Otis Avenues and the Mississippi River Boulevard, is located entirely within the MRCCA which was designated “to protect its natural, cultural, and scenic resources.” (Minnesota DNR-MRCCA). This property is designated with further protection as a Primary Conservation Area (PCA) under three categories: Bluff Impact Zone, Significant Existing Vegetative Stands, and Unstable Soils and Bedrock. These protections have been in effect since 1976, and the PCA designation is placed “to ensure that they are given priority consideration for protection.” (2040 Comprehensive Plan—MRCCA Chapter). The EAW has failed to address the intended purposes of the MRCCA and PCA protections. Further assessment is warranted.

Land Use: City of Saint Paul Planning Commission Resolution file number 90-14, February 9, 1990, approved the Special Conditional Use Permit (SCUP) for UST. That permit granted taller building heights within the MRCCA boundaries. The Planning Commission noted that one of the justifications for the taller building height was that it would encourage the preservation of more green space/open space on campus by encouraging buildings with smaller footprints. So, UST has extracted the provision of tall building heights while completely ignoring the underlying intent which is to preserve open space/green space by preventing construction of buildings with large footprints. UST has abused the intent of the SCUP, and the EAW has not performed a complete assessment of the Planning Commission Resolution 90-14 regarding the Special Conditional Use Permit. Further investigation is warranted.

Land Use: Planning Commission Resolution File 90-14 noted, "Before the Planning Commission may grant approval of a principal use subject to special conditions, the Commission shall find that. . . the use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare." The development of a complex of this size, mass, and magnitude plus its associated traffic and noise, is detrimental to the character of the neighborhood, and it does endanger the public health, safety, and general welfare of its residents in terms of noise, traffic congestion, emissions, loss of trees, and added stress. Even the mere discussion of this proposal has caused health-threatening stress to neighborhood residents. The EAW has provided incomplete information regarding the premises of the SCUP. Further assessment is warranted.

Geology, soils, and Topography/Landforms: The Department of Natural Resources (DNR) identified calcareous fens as a protected wetland on the property, as well as its associated rare plant species. Calcareous fens are considered to be rare, fragile, and highly protected (files.dnr.state.mn.us). Inexplicably, the EAW fails to address the calcareous fens on the property. This is incomplete information and it warrants further investigation.

Water Resources: The EAW cites the National Hydrography Dataset mapped flow line stream 140 feet west of the project in alignment with the Grotto. It also mentions the 12 penetration test borings conducted by American Engineering Testing which revealed groundwater at depths of 6 to 12 feet. One might easily deduce that there is a sensitive flow of water within this MRCCA area and yet there is no mention of protections or possible detriments. The EAW is incomplete in this analysis of water resources. Further investigation is warranted.

Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features): The EAW fails miserably with regard to identification of wildlife, plant communities, and sensitive ecological resources. Again, the DNR has identified the calcareous fens, a very rare, fragile, protected wetland, but the EAW makes no mention of it. On this section of the MRCCA property, on several occasions, I have seen a pair of enormous barred owls perched high in the tall, mature trees. I have seen bald eagles, red-tailed hawks, and several owl species. I have also seen adult and juvenile trumpeter swans flying overhead. Each year, more than 325 species of migratory birds make their way along the Mississippi Flyway. The U.S Fish and Wildlife Service identifies the project site as a high potential zone for the Rusty Patched Bumblebee, an endangered species, but UST development has already disturbed the habitat. The EAW has failed to identify significant wildlife and sensitive ecological resources at the site. Further investigation is warranted.

Historic Properties: In 1984, an application was submitted for the Saint Paul Seminary property to be included in the National Register of Historic Places (NRHP). Inexplicably, that application was never submitted, and oddly enough, UST purchased the property in 1987. Since taking ownership, UST has proceeded to raze the historic buildings and change the property without reservation, to the extent that the property is too far compromised to qualify as a historic district though several buildings are still considered eligible. The EAW has not provided complete information as to why the original application was never processed and included in the NRHP. Furthermore, the Heritage Preservation Commission has determined that a review of the project is required with regard to the eligibility of three historic properties on the project site. Further investigation is warranted.

Visual: Residents of Goodrich, Fairmount, Woodlawn, Cretin, and Summit Avenues and the Mississippi River Road, the Saint Paul Seminary residents and staff, and many other neighborhood residents have appreciated the open space vistas of the MRCCA property. Since 1979, most, if not all, of these residents purchased their homes with the knowledge of the MRCCA protected property and open visual vistas it provides. Many purchased their properties when the Saint Paul Seminary was still considered eligible as a historic property. This area of Saint Paul is grossly deficient in public park space and open space, and the MRCCA area has helped to fill that deficit. It is insulting to say that “the project will not have an impact on identified significant public views” and “views from the surrounding area would be similar to those experienced currently.” Where there once was MRCCA Urban Open Space and an extended landscape of mature trees and wildlife is now the back end of the Anderson Parking Ramp. No building on any part of the campus has the footprint and mass of the proposed arena. The EAW has failed to thoroughly assess the visual impacts of this proposed arena, and it is inaccurate in its comparisons to other structures and current views. Further investigation is warranted.

Air: Increased traffic congestion and car idling will significantly increase the emissions of carbon monoxide, hydrocarbons, nitrogen oxides, benzene, formaldehyde, and particulates. To anyone with asthma or other health issues, this is a nightmare. We did not purchase homes near the 10 highest traffic volumes in the Twin Cities. We purchased our homes in a clean, quiet, neighborhood adjacent to the MRCCA. The EAW has grossly underestimated the harmful impact of emissions on air quality. Further investigation is warranted.

Greenhouse Gas (GHG) Emissions/Carbon Footprint: Many ice rink refrigerants contain potent greenhouse gases that warm the atmosphere. Common synthetic refrigerants called hydrofluorocarbons (HFCs) have a Global Warming Potential (GWP) hundreds to thousands of times stronger than that of carbon dioxide (Environmental and Energy Study Institute, February 2022). The EAW makes no mention of the harmful effects of refrigerants. This is incomplete information that warrants further investigation.

Greenhouse Gas (GHG) Emissions/Carbon Footprint: The EAW mentions that UST “may” install up to four diesel generators for back-up power and to feed the UST MicroGrid. “Diesel generators produce particulate matter (PM), volatile organic compounds (VOCs), nitrous oxide (NOx) among other harmful pollutants that create smog and exacerbate respiratory conditions.” They also produce Greenhouse Gas Emissions (GHG). (Facilities Engineering Associates, P.C., 2017) This proposal for diesel generators is in complete contradiction to UST’s carbon neutrality goals, and it is in contradiction to the Saint Paul Climate Resiliency goals and goals of the 2040 Comprehensive Plan. This warrants further investigation.

Noise: The UST neighborhood has experienced a significant increase in noise from rooftop equipment on the new buildings, and from traffic noise with the increased traffic on Cretin Avenue. In particular, the Ford development has significantly increased traffic noise. Also, the modified intersection at Grand and Cretin and the lack of traffic enforcement has resulted in speeding at that intersection and all along Cretin Avenue. Cars on Cretin have been clocked at 45, 50, and 55 mph, and that appears to be more the rule than the exception. Noise levels will increase in the neighborhood, so does it not matter that UST will make a bad situation even worse? To address noise after the fact is not adequate. Data is needed to determine precisely how much noise will be generated by the mechanicals and how that noise would be mitigated. This should be done during the planning phase, not during or after building. Noise is a public health concern, and further investigation is warranted.

Transportation: The traffic study conducted is flawed and insufficient. First, the time period chosen for testing, just prior to a major, forecasted snowstorm, is NOT reflective of typical traffic volumes as drivers were likely off the road in anticipation of the storm. Also, shouldn’t a thorough traffic assessment also measure rush hour traffic during all weather conditions? Entering and exiting a property onto Cretin Avenue during stormy or icy conditions is a life-threatening experience. Secondly, the traffic analysis

seems to focus on major event games, but it does not address the additional traffic associated with graduations, convocations, employment fairs, youth hockey, non-major event games and other events that UST intends to hold in the proposed facility. These will all contribute to a congested, dangerous traffic situation that already exists on Cretin Avenue, and it is likely to spill onto residential side streets. It is important to keep in mind that this is a RESIDENTIAL AREA where people walk, ride bicycles, try to cross Cretin Avenue with strollers and young children. Many Saint Paul residents cross Cretin Avenue as they walk to the MRCCA area. Recall Goal #4 of the 2040 Comprehensive Plan is to promote "Strong connections to Mississippi River, parks, and trails". Remediation strategies of "Barricades, cones, and wayfinding signage" does NOT meet this goal. The addition of significant traffic into this residential area presents an incompatible mix that is contradictory to the policy goals of the 2040 Comprehensive Plan regarding the reduction of traffic in residential areas. It is also contradictory to the UST carbon neutrality goals and the goals of the Saint Paul Climate Action & Resiliency Plan. More in-depth assessment is warranted.

Other Potential Environmental Effects: The proposed project increases the amount of impervious surface in the MRCCA and PCA areas. Not only is this a net increase, it is also a change from discontinuous impervious surfaces to a single, very large, impervious surface. This is counterintuitive to any location, but it is particularly insulting to the MRCCA area where delicate water flow, vegetation, unstable soils, bluff impact zones, and calcareous fen wetlands exist. Further assessment is warranted.

The inadequacies of this EAW shed an unfortunate light upon UST, the City of Saint Paul, and Kimley-Horn. Any project, and in particular a project of this magnitude, deserves an environmental assessment that matches the integrity of the laws designed to protect our environment and natural resources. I look forward to a more honest and forthright assessment.

Sincerely,

Kathryn McGuire
1942 Glenhill Road
Saint Paul, MN 55118

Josh Williams

From: Kathryn Mitchell <mitch040@msn.com>
Sent: Thursday, July 20, 2023 10:00 AM
To: *Cl-StPaul_StThomasArena_EAW
Subject: St. Thomas Hockey and Basketball Arena

Hello St. Paul friends,

I am writing with neighborhood concerns about this new development that will increase traffic and street parking in our neighborhood. Already, with any activities like graduations, football games etc, the neighborhood becomes a big crowded parking lot with folks parking right up to the edges of alleys and driveways. My neighbors cannot have their friends and relatives come over unless they live in walking distance. Clearly there is no provision, once again, for parking. It is possible to put more levels in the Anderson ramp, but there is no interest in doing so we were told at the last meeting. How about some neighborly accountability and responsibility for all the vehicles brought in to this exciting new space?

Another concern is traffic flow. Mississippi River Rd is supposed to be a Parkway, but already at 8am and 5pm it has its own rush hour as many commuters prefer this to Cretin Ave, which is also busy and potholed. Unfortunately, most of these drivers do not observe the 25mph limit and many of them are going 40mph+. It is frightening, especially as there are many cyclists on this road. Surely it will be the route of choice for many coming to these events off of highway 5.

Please consider your tax paying, considerate and law abiding residents and the natural beauty of this area as you ponder this new development.

Sincerely,

Kathryn Mitchell
mitch040@msn.com

Josh Williams

From: art punyko <artpunyko@gmail.com>
Sent: Wednesday, July 26, 2023 8:40 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: EAW Comments

Dear Josh

Thank you for attending and presenting at the recent MGCC meeting on July 26th.

Here are my comments and/or questions on the EAW

1. Do the EAW estimates in section 18 for GHG emissions assume any of the mitigation strategies (in 18 b) have been implemented?
2. Per section 18, the proposed facility is estimated to have 3X the GHG emissions of the existing structures. Can the city EAW approval process and/or permitting process require UST to provide a certain percentage of photovoltaic and/or wind power generation and/or carbon offsets in order to reduce the off-site electrical generation emissions over the next 50 years?
3. In section 20b, there are tables that contain the parking deficit during the different event types and days of the week. Do these estimates assume that any of the mitigation strategies have been implemented?

Regards
Art Punyko
artpunyko@gmail.com

Josh Williams

From: Vettel, Matthew <mwvettel@stthomas.edu>
Sent: Monday, July 24, 2023 2:46 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: Comment from The Saint Paul Seminary

The Saint Paul Seminary would like to make the following comment on the EAW for the University of St. Thomas Multipurpose Arena. This comment was approved by Fr. Joseph Taphorn, Rector of The Saint Paul Seminary:

The Saint Paul Seminary would like to clarify that the driveway access off Summit Ave is a shared drive owned by both the University of St. Thomas (owners of Lot 2) and The Saint Paul Seminary (owners of Lot 1). The driveway is halfway on both lots. This detail was not included in the EAW. The seminary looks forward to future conversations with the University regarding anticipated changes, both structural changes and traffic volume changes, to the shared drive.

Thank you,
Matt Vettel

Matt Vettel | Senior Advancement Officer and Special Assistant to the Rector
The Saint Paul Seminary — Joyful Catholic Leaders
E: mwvettel@stthomas.edu **W:** saintpaulseminary.org
O: 651-962-5777



Josh Williams

From: Kelly Vinson-Taylor <kellyvtaylor@yahoo.com>
Sent: Thursday, July 27, 2023 9:11 AM
To: *Cl-StPaul_StThomasArena_EAW
Subject: University of St. Thomas Arena Project

Hello...my name is Kelly Vinson-Taylor and I live at 2127 Dayton Avenue. I am strongly apposed to the University of St. Thomas Arena Project due to the parking, traffic, and safety issues this will create and I don't feel were addressed in the Traffic Study portion of the EAW. I've attended 3 meetings where the University has spoken about the project (Meeting held at the Merriam Park Library, Meeting at the University of St. Thomas earlier this summer, and the EAW meeting held on July 12th and read through the entire EAW. Below are my key points/questions:

- Marshall & Cleveland were not included as a study intersection, although there was reference to traffic being routed to Cleveland. For that reason, that intersection should be included in the traffic study.
- Other key factors were not incorporated into the traffic study that need to be considered: The Bridge development is at the beginning of being built out. What impact will there be to Cretin Ave traffic flow as more people move into that development? There is work afoot to create "traffic calming" on Cretin and go from 4 lanes to 3 lanes. If that occurs, this traffic study is irrelevant and the result is that traffic for UST events will be backed up even more. Rapid Bus is being added to Marshall and by doing this new platforms are being added to key intersections (Marshall & Cleveland and Marshall & Cretin) this will change traffic flow in these areas, but was not factored into the study.
- Pg. 8 - references that there is not a crash problem currently. What about when the new volume of traffic is added? How will that impact crash volume? What about pedestrians trying to cross Cretin when it's dark at 4:30 in winter? It is currently not safe to cross Cretin unless you do so at a traffic light.
- Pg 14 - Total net loss of approx. 265 surface parking spaces. That is significant and one of the mitigation strategies is to hold large events on weekends so spectators can park in the neighborhood. I can attest that Dayton Ave. between Finn & Cretin during the academic year is "wall to wall" cars parked on both sides of the street due to student rentals in the neighborhood and St. Paul's focus on increasing density. Given these events will be held in winter (Nov. thru March), when poor snow plowing causes the streets to narrow, cars driving down Dayton cannot pass each other unless by chance there is an open parking space (which is rare) and will need to back up down the street the allow the other car to get by. Adding more traffic and fewer UST parking spaces is going to make this existing issue much worse.
- The study made reference to 75% of the students are going to walk or ride bicycles. Walking yes, but riding bicycles in hockey and basketball season which is winter...that is highly unlikely and needs to be adjusted.
- The study does not include Division 1 schools that have built a major arena in a city neighborhood vs. schools like Creighton who hold their basketball events in an area near downtown. Are there any? Has this been done before? Building an arena in a city neighborhood is much different than Creighton or schools in rural areas where there is access to more land to build parking and have fewer traffic issues.
- One entrance in and out of the arena and the parking ramp on Cretin is a significant bottleneck. Even with a traffic cop, how will anyone coming out of the ramp after a game be able to make a left onto Cretin to get to 94? And if they are required to go right, they will be try to weave around on the neighborhood streets trying to find there way out.

Overall, it seems the University of St. Thomas is trying to "squish" an arena into a small space and in the process is going to create multiple issues that will negatively impact the neighborhood and the spectator experience. I highly recommend that the traffic study factor in the issues mentioned above and be conducted again during the upcoming winter months when there will be a more apples to apples comparison.

Sincerely,

Kelly Vinson-Taylor
2127 Dayton Ave.

Sent from Yahoo Mail. [Get the app](#)

Josh Williams

From: Donn Waage <Waage58@outlook.com>
Sent: Tuesday, July 18, 2023 12:53 PM
To: *CI-StPaul_StThomasArena_EAW
Cc: #CI-StPaul_Ward4
Subject: Comment on St. Thomas Proposed Arena EAW
Attachments: St Thomas Arena.docx

I have attached my comments on the pro[posed St Thomas Arena. Thank you.

Donn Waage
2229 Fairmount Ave
Saint Paul

University of St Thomas Arena Environmental Assessment

Comments:

The proposed St Thomas Arena (Arena) would be a massive building that requires thoughtful study before approval. The building would be 275,000 square feet, or 42% of the size of the Xcel Arena. I am concerned that the EAW fails to identify, or understand, the full impact of this huge project.

The Arena will likely be the single largest project to ever impact the local neighborhoods and last for 50 years or more. Now is the time for thoughtful consideration of its impacts. The Xcel Arena, a LEED Platinum building, fits comfortably into downtown St. Paul which has large capacity streets and existing parking. Allianz Stadium also fits comfortably into a transit friendly area. In contrast the St Thomas arena project would be in a predominantly residential area which has limited roads and existing traffic and parking issues.

I will quickly review the major issues here:

1. Game Attendance. St Thomas believes its current sports facilities are inadequate, which is why they seek to build the Arena. St Thomas' goal is to fill the Arena for each of 66 regular games and to rent it out for profit. The EAW does not give the basis for estimates of game attendance, but they appear to be based on last year's games in the inadequate facilities. In addition, St Thomas' men's and women's hockey and women's basketball teams had losing seasons last year. More fans typically support winning teams. St. Thomas seems to be saying, "We are building this big expensive building, but don't worry, we won't use it much." Who would build a \$125 million building and state that it would only be used to capacity 3-4 times a year? In assessing the financial costs to the City and the impacts on local residents, a more realistic assessment of game attendance considering St Thomas' attendance GOALL, must be developed.
2. Events. The EAW, and St Thomas officials, have stated they will rent out the Arena for events. The EAW contains no estimates or analysis of the possible number or impact of events. The EWA refers to weddings and speakers; what about concerts? What times would these events be held? Will there be any time limits? Would alcohol be allowed? A fair estimate of the number and impact of events is critical to understanding the impact of this project because few of the mitigating factors suggested for St Thomas sports activities could be applied to them.
3. Alcohol. Last year St Thomas sought and received an expansion of its liquor license to include most of the campus and drastically increased the hours liquor can be served. St

Thomas' POLICY currently does not allow alcohol at sports events. Will this change? Will alcohol be served at other activities and events at the Arena?

4. Traffic. The EAW made a traffic count on March, 30, 2023. That study is irrelevant without including the City's traffic study for **Highland Bridge** which estimates up to 4,893 new trips daily on Cretin and Cleveland Avenues. The City also just approved the **Summit Ave. Regional Bikeway** which will substantially impact both auto traffic and parking. The Potential Cumulative Effects (page 39) of these APPROVED projects should be included in this report. There is no indication that these projects were included despite the Cumulative Impacts requirement. I asked two staff people in the "Transportation area" of the July 12 Arena Workshop and neither could tell me if the traffic study included the City's Highland Bridge estimates. If an honest traffic study were done it may indicate a need to enlarge Cretin Avenue, at public expense.
5. Parking. The report identifies real potential parking problems for the neighborhood. The EAW estimates the maximum parking space demand at 1,420 for basketball and 1,050 for hockey. It simply is not credible to expect an activity with 5,00-7,000 attendees will use so few parking spaces. In addition, the APPROVED Summit Avenue Regional Bikeway would likely remove many parking spots and reduce access by vehicles. Again, there is no indication that these potential impacts were included in the Study.

The report identifies many things St Thomas could do to mitigate traffic and parking problems but there is no indication that they will be implemented. Because some of these "solutions" will have further negative impacts they should be considered now, before the Arena is built, instead of on a crisis basis.

6. Environment. The proposed Arena will be built on North America's largest migratory bird flyway. The building will be the tallest in the area and yet there is no recognition of the potential deadly impact on migratory birds. US Bank Stadium, although further from the Mississippi River, is one of the region's most deadly buildings for birds due to its height and lighting. The National Audubon Society and Minneapolis Audubon sued the Stadium Authority over the US Bank migratory bird issue. There is no recognition of this important environmental issue in the EAW. Mississippi River zoning has been in effect since the 1970s and St Thomas commented on the recent Mississippi River Corridor Critical Area ordinance so it should be aware of its requirements.

Another major limitation of this EAW is that it includes no mention of lighting. Most basketball and hockey games occur between November 1 and March 1. The sun sets at 6:00 p.m. on November 1 and 6:01 p.m. on March 1. With dramatic increases in auto and pedestrian traffic additional lighting may be necessary. What additional lighting will be at the arena and will this lighting be projected downwards rather than randomly

upward impacting both birds and the neighborhood? Thoughtful design and lighting could save the lives of thousands of birds over the life of this project.

The EAW estimates only 20% of the game attendees will be students. With the impact of carbon on climate change such a major part of EAW review, should there be an assessment of the environmental cost of fans traveling from the suburbs to St Thomas for a game? Would there not be much less climate impact by building this arena in a suburban location? Will the new arena end its ranking as a Green College in the Princeton Review?

7. Construction Impacts. Construction impacts are of course temporary but real. Thousands of trucks and workers will come into the neighborhood. How will these, traffic, parking, noise and lighting impacts be mitigated. Among other things, will there be a responsible person at St Thomas assigned to help mitigate construction impacts?
8. Throughout this EAW and studies there are numerous references to mitigations that St Thomas **could** do. I believe the community needs real commitments instead of inadequate studies and hoping for the best.

St. Thomas wants to build a new Arena to have better sports facilities that draw more donors and students. It wants to build on its own land thus saving millions of dollars. It wants to avoid adding to its parking structure which would also add to its costs. But achieving St Thomas' two financial goals imposes burdens of the City and local residents that it does not want to mitigate or even acknowledge. St Thomas is a non-profit which contributes to the City but not financially. This project will add financial burdens to the City and traffic, noise and traffic to the local residents. I am especially concerned that, after construction, many Arena impacts will require City fixes. In particular, rebuilding Cretin Avenue could be very costly. If this inadequate EAW has a goal it seems to be to prove that:

If We Build It They Will Not Come.

It would be fascinating to review the communications St Thomas sent to its arena donors. The mission of the University of St Thomas is ... "to educate morally responsible leaders who think critically, act wisely and work skillfully to advance the common good." I do not think their actions to build a new arena live up to their mission statement.

Josh Williams

From: Margaret Wirth-Johnson <mwirthjohnson@gmail.com>
Sent: Thursday, July 27, 2023 3:54 PM
To: *CI-StPaul_StThomasArena_EAW
Cc: Josh Williams
Subject: Hold everything!

To Whom It May Concern:

I was not present at the July 12 meeting on the EAW (re the proposed stadium at St. Thomas) but I have read all of the many concerns that have been raised by four neighbors, (Grove, Brombach, Crenshaw, McGuire) who were at the meeting, and who have been working on behalf of, not only all of us who live in the neighborhood of St. Thomas to keep abreast of how a new stadium on the South Campus of St. Thomas will affect—not just us in this area, but also how it will affect the rest of the citizens of St. Paul and beyond, as the current plans for the proposed stadium do not adequately address concerns for environmental needs given the continued climate change crisis we are in.

Given the very legitimate points and questions raised by this group, I urge that plans and timelines for this stadium be halted until these neighbors' points can be addressed thoroughly, and that a new report be issued which contains responses to these questions and concerns. Ignoring the 2040 St. Paul Comprehensive Plan and a goal of carbon neutrality is not the direction St. Thomas should be taking.

In the 33 years my husband and I have lived in St. Thomas neighborhood, we have seen almost non-stop building and expansion of the campus, resulting in more noise in the area and way more traffic on Cretin Avenue. The noise of the excess traffic is one thing we contend with. Speeding cars on Cretin Avenue has resulted in Dayton-Cretin and Selby-Cretin intersections being almost impossible to cross during heavy traffic times. I have no data to back up this claim, but my impression is that St. Thomas traffic (cars going to and from the school) is the major reason for the heavy use of this street. It's very clear that this is so when one observes the great lessening of Cretin traffic during school breaks. According to the St. Paul Transportation Committee of UPDC, these two spots are where cars are LEAST likely to stop for crossing pedestrians. The very idea that St. Thomas would like to have yet another building that will bring even MORE traffic to this area is abhorrent to me and to others.

Again, I repeat, stop the process and address every single point on my neighbors' letter before continuing on with the plan to build.

Maggie Wirth-Johnson
2224 Dayton Avenue
St. Paul, MN 55104

Josh Williams

From: Josh Williams
Sent: Monday, July 24, 2023 2:29 PM
To: *CI-StPaul_StThomasArena_EAW
Subject: FW: EAW for proposed for St Thomas Arena - comments

From: Meg Grove <meg.grove@hotmail.com>
Sent: Saturday, July 22, 2023 8:43 AM
To: Josh Williams <josh.williams@ci.stpaul.mn.us>
Cc: Rosemary Maun <rosemary@maunmedia.com>
Subject: Fw: EAW for proposed for St Thomas Arena - comments

Think Before You Click: This email originated outside our organization.

Josh - Here are comments on the St. Thomas EAW from Rosemary Maun. She had some trouble with her email, so asked me to send them to you on her behalf. I've cc'd her as well.

Meg Grove

On Jul 21, 2023, at 8:37 PM, Rosemary Maun
<rosemary@maunmedia.com> wrote:

Meg, I'm sorry but I'm having a horrid time in getting my short paragraph to either of the EAW comments before the end date. I'd appreciate it if you would send it for me.

"My house was built in 1926 and it's been my Home now just short of 50 years. My three sons were all raised here. I planned on being here for the duration. What saddens me, besides all the unnecessary devastation to a lovely neighborhood - it just isn't right! I'm afraid the day will come when I will see someone killed while trying to cross Cretin Avenue on Goodrich. There has to be a better solution. I'm asking that you find one."

Rosemary Maun
2188 Goodrich Avenue
St. Paul, MN 55105

From: Meg Grove <meg.grove@hotmail.com>
Sent: Saturday, July 22, 2023 8:39 AM

To: Josh Williams <josh.williams@ci.stpaul.mn.us>
Subject: Re: EAW for proposed for St Thomas Arena - comments

Hi Josh. Thanks for picking this up. Here's the email and attachment.

In related news, one of my neighbors, Rosemary Maun, emailed me that she's having trouble emailing her comments. She's a very sweet older person who struggles with technology sometimes. She asked me to send them in for her. I will do that under a separate email to this same address - hope that's ok.

Thanks!

Meg Grove

From: Josh Williams <josh.williams@ci.stpaul.mn.us>
Sent: Friday, July 21, 2023 6:54 PM
To: Meg Grove <meg.grove@hotmail.com>
Subject: EAW for proposed for St Thomas Arena - comments

Hi Meg,

This evening I was compiling the last of the comments the City received on the St Thomas EAW. Your comment and one other were flagged as potential spam by Microsoft (probably because you included an attachment and it was from a Hotmail address). I released the email and it should be now included in the location where we are collecting comments for response, but things can be a little weird with City systems in the evenings, as this is when a lot back-up and other maintenance routines are run.

Would you please resend your email and attachment to this address when you have a chance? I don't think there is a problem but I want to make sure. Thanks much!

Josh



SAINT PAUL
MINNESOTA

Josh Williams
Principal Planner
he/him/his
Department of Planning and Economic Development
1400 City Hall Annex, 25 West Fourth Street
Saint Paul, MN 55102
P: 651-266-6659
josh.williams@ci.stpaul.mn.us



UST Arena EAW

Open House Comment Form
July 12, 2023

NAME: Carol Walsh
ADDRESS: 1834 Laurel Ave. STP
PHONE: 651-644-0226
EMAIL: bycarolwalsh@hotmail.com

COMMENTS:

TRAFFIC

Please be mindful of pedestrians — students, neighbors of all ages, visitors — and clearly mark and maintain areas where you can cross safely. Keep the 'walking stick' mark on for adequate amount of time to cross streets. Ensure adequate lighting for pedestrians and cyclists.

Public Comments

Tom and Karen Alf

Comment	Response
6 – Project Description	
<p>No mention is made in their Mission and Conviction statements of sports nor the need to achieve sports excellence by moving to Division 1 for basketball and hockey. In the EAW, Item 6d, the stated purpose of the multipurpose arena is to “...house a competition venue for the UST hockey and basketball to meet Division I athletic program expectations”.</p> <p>UST chose to move directly to division I from Division 3 rather than finding another Division 3 league (after being ousted from the MIAC) or going to Division 2. More importantly, highly competitive sports programs do not help UST achieve their Mission Statement nor any of their listed Convictions; whereas, improved educational facilities and better paid faculty which would help UST achieve their Mission and Convictions.</p>	<p>Thank you for your comment. This comment is not related to the EAW.</p>
<p>General Item 6b – Construction access is via Grand Ave termination access road and another access described as “on the western boundary of the project site”. Where would vehicles enter the south campus to access the western boundary of the project site? We want to make sure there is no vehicle access from Goodrich Ave to the project site.</p>	<p>Thank you for your comment. Primary access to the Arena both during and after construction will be from Grand and Cretin. Changes to vehicle access along Goodrich Ave are not anticipated for this project.</p>
7 – Climate Adaptation and Resilience	
<p>St. Thomas has indicated a goal of being climate neutral by 2035. Adding a 6,000 square foot arena with two ice sheets runs counter to UST’s goal of carbon neutral by 2035. Despite trying to obtain LEED Silver certification, the arena will significantly add to Greenhouse Gas (GHG) emission over its lifetime.</p>	<p>Potential GHG emissions for a project are evaluated as a required element of an EAW. The University of St. Thomas, the project proposer, has stated a commitment to the goal of carbon neutrality by 2035 and are evaluating options to achieve this goal for the institution. The City of Saint Paul’s Climate Action and Resilience Plan calls for City operations to be carbon-neutral by 2030, and citywide carbon neutrality. The proposed project is general consistent with that plan,</p>

Comment	Response
	which calls for the City to work with private entities and utilities to reduce energy consumption in both existing and new buildings and to provide less carbon intensive or carbon neutral energy, respectively.
Building the arena will destroy 76 existing mature trees with only 50 small new trees planted near the site. Besides losing 26 net trees, the loss of mature trees means significant loss of annual carbon capture until new trees are mature.	Evaluation of expected GHG emissions and potential impacts to climate change are required elements of an EAW process. Currently there are no tree preservation requirements in the City of Saint Paul at the project location. However, the University of St. Thomas has committed to replacing all trees removed onsite at a 1:1 ratio. The University's stated intent is to replace the trees within or adjacent to the approximately 6-acre site for the Arena project, but since there is limited space within the Arena project area they will first replace trees elsewhere on the South Campus and then look at other areas within the remaining portions of campus for tree planting opportunities, if needed
The project will reduce grass and landscape by one acre adding to urban heat island impact especially when including the surface area of the 6,000 sq ft arena.	Thank you for your comment.
10 – Land Use	

Comment	Response
<p>Item 10 ii - This item mentions and describes the MRCCA River Towns and Crossings District (CATT) [sic]; however, the project site is currently falls within the MRCCA – River Corridor Urban District (RC3) as noted in the last sentence of this section. The River Corridor RC3 should be the zoning rule used to determine whether the project complies with those zoning rules.</p> <p>The RC3 River Corridor zone calls for a maximum building height of 40 feet. The proposed project arena maximum height as noted in Item 6c is the basketball practice facility of 68 feet and 58 feet 3 inches for the main arena, both of which are substantially higher than the RC3 River Corridor zoning maximum height of 40 feet.</p>	<p>The MRCCA overlay is part of the Saint Paul Zoning Code. Per Ch. 61 of the Saint Paul Zoning Code. When an application has been filed and determined to be complete, applicants have the option of having a project evaluated under either the code at the time of application or the code as amended subsequent to the amendment but prior to action on the application. The Saint Paul Planning Commission has held a public hearing on a draft new MRCCA ordinance consistent with Minn. Rules 6106, which govern the MRCCA, and City staff expect the draft ordinance to go back to the Planning Commission for a final recommendation to the City Council in Fall of 2023. At the time the EAW was released for public review and comment, no formal applications for the proposed arena had been submitted to the City.</p> <p>As noted in the EAW, the City of Saint Paul regulates building height on the University of St. Thomas South Campus via a previously approved Conditional Use Permit (CUP).</p>
<p>19 – Noise</p>	
<p>The Science and Math building built in the northeast corner of the South Campus some years ago created unacceptably loud noise from HVAC equipment on top of the building. It took St. Thomas and the City of St Paul over a year to correct his issue after repeated complaints from neighbors on the south side of the South Campus. The EAW calls for operational noise testing. Please provide us specifics of operational noise testing results as they become available. We want to avoid a repeat of the Science and Math building noise issue.</p>	<p>Thank you for your comment. Noise from any equipment will be required to meet City of Saint Paul ordinance, which is based on state law. The comment has been shared with the project proposer and the project design team, and the City will note the need for noise testing in project approval documents..</p>
<p>20 – Transportation</p>	

Comment	Response
<p>Parking – The proposed arena poses significant hardship on the near-surrounding neighbors to the south and to the east of the South Campus. The only way that neighbors can protect themselves from basketball and hockey fans parking in front of their homes is to go through the St Paul parking permit process. They would need to request “No parking except for area permits” which makes it difficult for a household to hold moderate to large size gatherings over the weekend since each home is allowed only 2 visitor permits.</p>	<p>Thank you for your comment. The EAW used attendance numbers from other Division 1 programs within UST’s conference, excluding the top and bottom capacity programs, to estimate potential parking deficits for sporting events. Based on current understanding of planned facility usage, events creating parking deficits greater than 100 spaces are expected to occur only a few times annually (see numbered page 37 of the EAW (Appendix A) for more information on annual frequency and days of week of events).</p> <p>However, it is possible that some sporting events may result in more attendance than projected in the EAW analysis. In addition, parking demand for non-sporting events was not evaluated.</p> <p>The Findings of Fact document for the EAW outlines mitigation measures that the City of Saint Paul will require as conditions of any permit approvals in order to mitigate potential impact related to parking demanded by the proposed project. For more information, see the section titled Mitigation Plan.</p>
<p>The EAW notes that 264 net parking spaces would be lost due to arena construction leaving the Anderson ramp the only available parking on the south campus.</p> <p>The transportation study goes through an elaborate analysis with a number of assumptions to attempt to determine the adequacy of on campus parking. They concluded that basketball using maximum capacity would have a parking deficit of about 330 to 740 depending whether a week night or weekend game. Given the highly competitive nature of St. Thomas sports, we feel it likely that more games for both basketball and hockey will approach max capacity than the parking study assumes.</p> <p>Used page 37 parking summary analysis, Tables page 26 and 27 and Tables page 12 (Figure 3). The parking study ignores common sense/human nature; namely, people will</p>	<p>Given the nearby permit parking restrictions, during weeknight events the ASC and McNeely ramps are equally as close, if not closer, than legal neighborhood on-street parking. As noted in the Transportation Study, these permit parking restrictions are largely lifted on weekends, which will likely result in drivers being more likely to utilize on-street parking in the surrounding area instead of off-street parking facilities on the UST campus. The mitigation measures required by the City of Saint Paul as conditions of any permit approvals for the proposed project recommend consideration of changes</p>

Comment	Response
<p>look for the closest and cheapest parking available. Excluding Anderson ramp on South Campus, the closest parking are the neighbors east and south of the project site. These areas will be used before the ASC ramp or the McNeely ramp. Tommie north and Tommie East will not likely be used as they are 6-8 blocks from the project site. Tommie North and East were assumed to provide 110 spaces which if not used means more fans parking in our neighborhood.</p>	<p>to nearby residential parking permit districts as part of a larger parking management plan for events. UST will communicate expected off-street parking areas for sporting events within held within the building like is done for other university sporting events.</p>
<p>All of this means the surrounding neighborhoods will have much more significant parking use than the study assumes which is an undue burden on the surrounding neighborhoods, especially, considering that the home basketball/hockey total of 32 games each for men and women which totals 64 games per year. Plus, all the other events St. Thomas plans to hold at the arena.</p>	<p>As part of mitigation of potential impacts to parking related to the proposed project, The City of Saint Paul is requiring St. Thomas to consult with the City of Saint Paul on enforcement of parking violations.</p>
<p>At a minimum, we strongly feel that the City must insist before their approval of the EAW, that St. Thomas add the two additional allowed floors to Anderson ramp BEFORE the arena opens.</p>	<p>Thank you for your comment. The City of Saint Paul as the RGU has determined that mitigation measures other than immediate expansion of the Anderson Parking Facility are available and can sufficiently off-set potential parking impacts of the proposed project. Required mitigation measures also include ongoing evaluation of parking and traffic impacts of the proposed project.</p>
<p>The study assumes about 1,500-1,600 added car trips pre and post event. With 64 basketball/hockey games plus the other events planned for the arena, the added car trips in very concentrated times periods adds much more noise and “traffic jams” during these events adding further burden to the surrounding neighborhoods.</p>	<p>The trip generation estimates in Table 11 of the Transportation Study (1,500 – 1,600) are for maximum capacity basketball events, which are anticipated to occur once or twice per year. Event congestion is expected to occur; however, it is anticipated to only last 20-30 minutes pre- and post-event.</p>

Eric Beck

Comment	Response
<p>6 – Project Description</p>	

Comment	Response
<p>Re. Deconstruction/preparation of the site: How long will this part take, roughly?</p>	<p>Deconstruction of the existing buildings and preparation of the site will take approximately 9 months. Some overlap between deconstruction of the existing site and construction of the new site may occur based on when certain buildings can be removed.</p>
<p>7 – Climate Adaptation and Resilience</p>	
<p>Please consider adding "green" or succulent-based roofs to the new structures, and/or include pollinator plants -> to help lighten the local environmental impact of this giant structure.</p>	<p>The project will incorporate pollinator friendly landscaping into the project design to build upon the existing pollinator pathways within the campus. A "green roof" is not planned at this time.</p>
<p>Is any of the water/rain/snow run-off from the new arena and facilities going to be captured and re-used for: flushing toilets, watering gardens, etc.?</p>	<p>Water re-use within the building is not being considered at this time. The project team is exploring if water re-use for irrigation is a viable option.</p>
<p>17 – Air</p>	
<p>Re. Deconstruction/preparation of the site: Any how about dust and other air contaminants that may be generated when the existing buildings are demolished?</p>	<p>Dust will be managed during demolition of the existing structures and during construction. The project is required to comply with local ordinances. The City of Saint Paul and Capitol Region Watershed District require various construction site practices to reduce fugitive dust. These practices are required as part of the permitting process</p>
<p>20 – Transportation</p>	
<p>Re. Deconstruction/preparation of the site: Will this generate a significant increase in local traffic, with dump trucks, etc.?</p>	<p>The project will generate construction traffic similar to other projects on the University of St. Thomas Campus and other projects in Saint Paul of similar size and scope. As part of the permitting process, the City of Saint Paul</p>

Comment	Response
	will identify appropriate haul routes to and from the site for construction vehicles.
<p>Re. Traffic after the arena has been built:</p> <p>Please consider adding incentives for attendees of games, other events, etc. to: carpool; use electric or plug-in hybrid or hybrid vehicles; add substantial outlets in the existing and new parking facilities to promote cleaner, decreased emission vehicle use; IF buses are involved in transporting teams and/or spectators, ADD electric vehicles to your fleet.</p>	<p>Thank you for your comment. While use of EVs is not among these measures, the City supports adoption of EVs through public installations, and encourages all applicants, particularly larger businesses and institutions to include EV charging stations in new facilities. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Beth and Bill Brombach

Comment	Response
8 – Cover Types	
<p>How can the loss of 76 mature trees easily be discounted, by saying that 50 little trees will be planted to replace them and even more outrageous is that they won't even be replaced in the area where they have been chopped down?</p>	<p>Currently there are no tree preservation requirements in the City of Saint Paul at the project location. However, the University of St. Thomas has committed to replacing all trees removed onsite at a 1:1 ratio. The University's stated intent is to replace the trees within or adjacent to the approximately 6 acre site for the Arena project, but since there is limited space within the Arena project area they will replace them elsewhere on the South Campus and then look at other areas within the remaining portions of campus for tree planting opportunities if needed.</p>
13 – Contamination/Hazardous Materials/Wastes	

Comment	Response
<p>Why are more environmentally friendly alternatives not being used for backup generators to the arena? Diesel powered is what they are proposing. Is this the 1970s?</p>	<p>Emergency power is a requirement for the Arena to meet life safety requirements and would only be used during a power outage or during the required monthly testing. The project proposer is evaluating multiple alternatives for backup generators. Emergency power demand for the building will influence allowable fuel sources.</p>
<p>14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>It is also a conservation area that supports the endangered rusty patched bumblebee.</p>	<p>Per the project proposer, the project will incorporate pollinator friendly landscaping into the project design to build upon the existing pollinator pathways within the campus. See also response to comments from the Minnesota Department of Natural Resources.</p>
<p>20 – Transportation</p>	
<p>How can a parking lot be put in the last green space of the south campus? This green space is in a conservation area. It runs along the Mississippi Flyway and is used by 75% of ALL North American migratory birds. The environmental impact of chopping down these old growth oaks and putting in a parking lot and road to an area that will directly runoff into the river, is an absolute travesty.</p>	<p>Use of this area for parking was identified as a potential strategy in the EAW to help meet parking demand for large events. The City does not support this strategy, and it would likely not be permitted under Mississippi River Corridor Critical Area Rules (the City is in the process of adopting new ordinances consistent with the MRCCA Rules). The project proposer has also indicated that they do not support this strategy.</p>
<p>What assurances does this neighborhood have that our streets, particularly Goodrich Ave, will not be used as an offsite parking lot and backdoor entrance to this project. I live on Goodrich and our street is already completely full of St. Thomas cars every school day and many event weekends.</p>	<p>On the south side of Goodrich Avenue, parking is by permit only between Cretin Avenue and Woodlawn Avenue, and completely banned between Woodlawn Avenue and Mississippi River Boulevard. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>The traffic assessment was limited and done at a time when there was a threat of a big snowstorm. Also, many students and professors were</p>	<p>Thank you for your comment. As stated on Page 4 of the Transportation Study "To determine if the traffic counts were representative of an average day in the study area, MnDOT detector data was reviewed at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results</p>

Comment	Response
<p>already leaving for Easter Break. This does not reflect the huge volume of cars that already use Cretin.</p>	<p>of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of an average day for the study area, therefore, no adjustments were made to the counts." Please note that Easter Break for the University of St. Thomas occurred from April 7-10 which is one week after the traffic counts were collected.</p>
<p>21 – Cumulative Potential Effects</p>	
<p>I don't see language that describes how any problems that will develop after an immense project like this occurs, will be monitored or actions enforced. By that, I mean, noise level of the buildings, traffic, parking, light pollution, misuse of neighborhood streets & air/dust pollution.</p>	<p>The project will be required to comply with all applicable City Ordinances regarding noise and lighting. Typical construction practices to reduce dust and dirt migration will also be required. Traffic and parking will be addressed through mitigation measures which the project proposer will be required to implement.</p>
<p>In conclusion, the scope of the UST proposed project will have such a lasting influence on anyone who lives in the surrounding neighborhood, that it is malfeasance to allow this to happen without more work to assess all of the cumulative effects that this project will have. The project that is being considered is too large and will have lasting negative environmental effects in this area. This does NOT go along with the 2040 Comprehensive Plan. As a matter of fact it does the opposite.</p>	<p>Thank you for your comment. The EAW evaluates potential impacts resulting from the project and found the project to be generally consistent with the Comprehensive Plan. The subsequent permitting process will provide opportunities for further comment on the appropriateness of the project and compliance with the Comprehensive Plan.</p>

Ann Cohen, John Glasenapp, James Fitzpatrick, and Carol Walsh

Comment	Response
<p>The City of St. Paul should not approve a negative declaration on this EAW because it is incomplete and inaccurate. The EAW identifies impacts that have the potential to be significant, but fails to provide an adequate description of the mitigation measures that will be implemented. The EAW also identifies potential phased actions associated with this</p>	<p>Thank you for your comment. The purpose of an EAW is to identify potential impacts from a proposed project. A negative declaration is only made if the City determines that proper mitigation, identified in this document, has</p>

Comment	Response
<p>project—such as increased individual vehicle parking and diesel-powered electricity generation—that are contrary to City of Saint Paul and UST strategic sustainability plans and that constitute likely future significant environmental impacts from this project or its future phases.</p> <p>The City of St. Paul should require UST to produce information regarding how it will mitigate the impacts of this project and its likely future phases, rather than providing a “negative declaration” based on UST’s “vague statements of good intentions.” UST should be held to the highest standards for the production of information supporting documents of this nature because it has the capacity to collect, analyze and produce accurate and complete information. The City should ensure that this EAW is accurate and complete before it is approved, or should order UST to prepare and Environmental Impact Statement.</p>	<p>been identified. All mitigation measures are required to be implemented as part of project permitting. For more information, see the list of mitigation in the section titled Mitigation Plan.</p> <p>Phased actions are defined in Minn. Rules 4410 and refer to projects for which multiple phases are planned within a period of time. The project proposer has noted the possible future addition of vehicular parking on the campus, particularly via an addition to the Anderson Parking Facility (APF) but has not established a timeline for that possible work. The question of timing aside, any proposed addition to APF or construction of additional parking elsewhere on the St. Thomas campus would require City review, including a traffic study and identification of any needed updates to the traffic management plan for the proposed arena, which is required as mitigation.</p> <p>Regarding diesel power generation, the project proposer has indicated that diesel power generation beyond that for emergency back-up is no longer proposed as part of the project.</p>
7 – Climate Adaptation and Resilience	
<p>The EAW fails to provide any specifics or commitments regarding the measures UST will adopt to mitigate stormwater impacts related to the expansion of impervious surface and loss of vegetated landscaped areas. The EAW states (emphasis added):</p> <p>Pdf 10. University of St. Thomas <i>is considering</i> ways to design landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff and mitigate for the urban heat island effect.</p>	<p>The project is still under design and the Project Proposer is currently evaluating design elements to minimize impacts to existing resources on the site. The terminology such as “considering” and “investigating” was used to allow for the project design to further advance and incorporate the appropriate design features and mitigation strategies. The project team is currently working through the design of the project and as design progresses, ways to minimize run-off and provide efficient</p>

Comment	Response
<p>Pdf 11. University of St. Thomas <i>will investigate</i> ways to design the stormwater management facilities to minimize standing water and reduce the risk of flooding on the project site.</p> <p>Pdf. 12. University of St. Thomas <i>is investigating</i> ways to minimize tree removals or replace more trees than are removed and include non-invasive plants, resulting in a net gain of suitable habitat for local species including small mammals, insects, and birds. As it stands, the EAW predicts a net loss of 26 mature trees as the result of the project (pdf 13). Although UST plans to plant trees “elsewhere on campus,” locations are not identified making verification impossible.</p>	<p>and effective stormwater management will be implemented. There are local and state stormwater requirements that apply to this project which are required for the project to advance to construction and will be documented as part of any future permitting processes. The City of Saint Paul advises on landscaping, including trees, during permitting approvals. There is no requirement that trees be replaced in the same location.</p>
<p>The EAW fails to clearly identify how the project will be powered. The EAW states that the project is being considered for connection to the campus microgrid for back-up power during outages or emergency events. Pdf. 11. However, the EAW then states “The project may install a diesel generator to provide backup power to the arena <i>as well as up to four additional future diesel generators to feed the University of St. Thomas’ MicroGrid</i>. These generators would have diesel storage tanks at each generator or utilize one fuel storage tank for fuel supply. The project proposer will obtain the appropriate permits from the MPCA.” Pdf 27 (emphasis added). <i>Based on this language, it appears that one unstated potential purpose of the project will be to provide fossil fuel power for the campus rather than reduce fossil fuel dependency</i>. Moreover, the proposed generators will require underground or aboveground petroleum storage tanks, which will pose unavoidable issues with spills and leaks very close to the Mississippi River. The EAW contains no discussion whatsoever of the potential for installing solar panels on the structure to generate clean energy. The EAW contains no discussion of the potential to purchase energy for the project from clean energy sources, such as a solar installation located elsewhere on campus.</p>	<p>The intent is that the Arena project will be powered through connection to the existing Xcel Energy grid that exists along Cretin Avenue. A backup generator will be included in order to meet code requirements. The project is evaluating ways to meet the University’s sustainability goals through the design of the project including the relocation of solar panels that exist on top of McCarthy Gymnasium.</p> <p>The University has decided to eliminate the Microgrid Expansion program from the Arena project; therefore, the diesel generators identified for the Microgrid Expansion will not be incorporated into this project. MPCA permits are required for all tanks for storage of petroleum products and hazardous materials. Tanks over 500 gallons require secondary containment for the stored liquid in the event of a tank leak.</p>
12 – Water Resources	
<p>Pdf 22. Instead of designing to reduce current direct stormwater discharge to the Mississippi, the Project appears to be designed to maintain current direct discharges via an existing stormwater tunnel. The project will thus continue impacts (erosion and</p>	<p>The project will meet rate control, volume control, and water quality treatment requirements as outlined in the Capitol Region Watershed District Rules and City ordinance. These rules are in place to ensure that</p>

Comment	Response
<p>sedimentation) related to rapid discharges of stormwater to the river instead of environmentally-preferable infiltration.</p>	<p>stormwater is discharged from the project site at an equal or lesser rate than existing conditions and the stormwater discharge is cleaner than the existing water leaving the site.</p> <p>Due to the shallow groundwater and poor soils, infiltration is not a viable option for the site according to local and state regulations.</p>
<p>13 – Contamination/Hazardous Materials/Wastes</p>	
<p>The EAW identifies that the project will generate large quantities of construction debris that will require disposal or recycling, but fails to identify the use of techniques to “deconstruct” the existing buildings in a manner that will maximize environmentally superior <i>reuse</i> of materials. See, e.g., https://www.rethos.org/sustainability. Similarly, the EAW does not contain any details regarding the impact of waste that will be generated at games and other events held at the building.</p>	<p>Thank you for your comment. The project proposer has indicated that the project will pursue the maximum number of LEED points for diverting waste from landfills through careful on-site management of materials and coordination with their chosen waste management partner. Construction debris will be sorted and disposed of at the appropriate offsite locations. The project will also be required to meet all city, county, and state requirements for demolition. The project proposer has indicated that waste generated at events held at the Multipurpose Arena will be disposed of through the University’s waste, recycling and compost programs located within their campus. The University has a goal to reach a waste landfill diversion rate of 80% by 2030.</p>
<p>18 – Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	
<p>The EAW attaches a UST greenhouse gas analysis. However, this analysis is not specific to the project, generally dates from 2020, is manifestly incomplete, and amounts to “lip service” rather than a real commitment by UST to addressing the most significant environmental issue of the present time.</p> <p>For example, there are numerous “?” rather than data on the following table (pdf 71).</p>	<p>The Project is in the early stages of design and the design details have not been finalized. The mitigation strategies identified in the EAW have not been incorporated into the operational emissions calculations as presented in the EAW.</p>

Comment	Response
<p>Similarly, the following information is largely missing, other than the admission that UST does not purchase any “offsets” for the greenhouse gases it produces (pdf 72).</p> <p>The “proposed scenario” section dated January 2023 is also manifestly inaccurate, noting, for example, that natural gas and #2 fuel oil are also used but providing fuel consumption figures solely for natural gas. This is unacceptable.</p> <p>The project-specific greenhouse gas analysis is, as noted above regarding other aspects of the proposed project, entirely nonspecific with regard to mitigation strategies that will be incorporated into the project. The EAW states only that “[t]he following design strategies and other sustainability measures <i>are being considered</i> for the proposed development to reduce emissions” rather than identifying particular project commitments, such as the use of on-site photovoltaics. Pdf 36-7. While it is likely that UST will incorporate <i>some</i> of the identified mitigation features into the project, it is impossible to review the true impact of the project based on UST’s “consideration” rather than “commitment.”</p>	<p>The South Campus has some buildings that are provided low-pressure steam from a central heating plant located in Owens Science Hall, but the Arena is planned to be a heated by energy-efficient hot water boilers located in the building. The arena’s hot water boilers will be interconnected to adjacent buildings to provide redundancy for improved resilience. #2 fuel will only be used when natural gas is curtailed by Xcel Energy in times of extreme cold when natural gas demand is high. The emergency generator will also use #2 fuel but will only run infrequently during power outages or required monthly testing. There is not a central cooling plant on the South Campus, but building systems are interconnected, when possible, to allow phased operations due to cooling demand and to also provide redundancy for improved resilience.</p> <p>The University has a goal of carbon neutrality by 2035 and they will look to incorporate mitigation strategies as described in the EAW to help achieve that goal.</p>
20 – Transportation	
<p>The EAW fails to implement UST’s sustainability strategic plan commitment to reduce vehicle traffic to the campus, admitting that the existing parking ramp will be expanded to accommodate increased parking as a second phase of this project, pending funding. Pdf. 7. More parking will attract more individual-use vehicles. The EAW makes no mention of encouraging electric vehicle use of the facilities that will serve the project by installing charging stations. The potential for expanded parking, while helpful to reduce neighborhood impacts during high-use periods, is nevertheless environmentally detrimental. The EAW contains no discussion of how clean transportation could be used to bring fans or players to games.</p>	<p>Thank you for your comment. The existing Anderson Parking Facility (APF) was initially designed to expand an additional two levels when the project was constructed in 2008. The APF expansion is listed as one potential mitigation strategy in the Transportation Study. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
6 – Project Description	
<p>In the introduction, in the very first paragraph, it is stated “other events...high school/youth sports, and conventions may also be held at the venue.” On p. 19. It is stated “conventions, career fairs, etc. are often hosted on the North Campus.” Will they be moved to the flagship Anderson Arena? UST representative Amy McDonough told participants at a MGCC HLU meeting “We aren’t building this to have it stand empty”.</p> <p>I find it hard to fathom that an institution as well organized as UST doesn’t have specifics on what these “other events” will be. Those of us who have been involved in high school athletics have seen the large number of attendees at legacy games, conference tournaments and consolation rounds, bringing in hundreds or thousands of people from outside the immediate area. Throughout the document, references are made to the shortage of parking. These vague “other events” could be significant and needed to be addressed as to their impact on traffic and parking.</p>	<p>According to the project proposer, it is possible that other events such as conventions, career fairs, and commencements currently held in other spaces across campus may now occur in the arena. Depending on size of “non-athletic” events, they may also continue to be held in other locations on campus.</p> <p>The primary scheduled, reoccurring use of the arena is for basketball and hockey events and therefore was selected as the focus of the EAW transportation analysis. The events studied represent the likely maximum impact from a traffic and parking perspective. The project proposer has not provided detailed information on the type, attendance, or frequency of "non-athletic events" that may be held in the arena. It should be noted that some events would have a much larger student to non-student ratio than athletic events. Please see the list of mitigation in the section titled Mitigation Plan for more information.</p>
<p>Because the “other events” are not identified, the hours of operation aren’t either. This is important information for analyzing the effects of this proposal on the neighborhood and should be included in a comprehensive EAW.</p>	<p>See the response directly above for response.</p>
16 – Visual	
<p>The visual effects are said to not be “adverse”. We have not seen what this 70’ building will look like from the sides and back, and the visual effects could be extremely “adverse”.</p>	<p>The building will be visible on the campus.. However, existing buildings remain adjacent to the proposed building on campus. The building will be most visible from the south. The proposed building height is consistent with the campus CUP previously issued by the City. The project proposer has also committed to match the architectural</p>

Comment	Response
	materials and design quality of existing buildings on campus, and has agreed to share renderings as the project design advances., .
20 – Transportation	
<p>Regarding the effects of this large arena on traffic and safety of pedestrians and drivers, on p. 10, Appendix D, it is stated that on Cretin Ave. “Left turn movements and time-of-day-on-street parking were observed to cause abrupt lane changes and friction along the corridor.” Cretin Ave is already congested (reference p. 10, Appendix D). Adding a predicted number of up to 3784 “passenger vehicle trips (p. 24, Appendix D) on the roadway will only add to this friction. Long wait times at lights, even longer waits from residential streets without lights (“During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 13 to 30 minutes.” p. 38, Appendix D) are expected to occur as a result of the proposed arena. It is difficult to see how this predicted and predictable effect on Cretin Ave., intersecting residential streets, and pedestrians who attempt to cross this already busy road is acceptable, particularly when the city comp plan emphasizes the commitment of the city to the safety of pedestrians and bikers. Idling cars will also add pollutants and Greenhouse gases, another effect not fitting with the com plan’s commitments to city residents.</p>	<p>Collegiate sporting events are expected to occur largely outside of peak traffic hours (i.e. 7-9 am, 4-6 pm on weekdays). During this time, background traffic volumes are lower. Event congestion is only expected to occur for 20-30 minutes before and after the event. Several event management strategies were recommended as part of the Transportation Study to improve safety and comfort for pedestrians walking to/from the arena during pre- and post-event conditions and can be seen on Page 36, 39 and Figures 12 and 13. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>Parking will be a huge issue. The EAW has laid out numerous deficits in parking spaces from a shortage of 40 to a shortage of 742 (Table 13, p. 28, Appendix D and p. 34, Appendix D). This is taking into account the assumption that many people will walk up to 0.5 mi to attend. The document states that it is “good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional 5 to 15%” (p.17, Appendix D) in order to reduce cars driving around looking for spots to park (again, safety and Greenhouse gas emissions are an issue). This best practice is obviously not being followed. The EAW suggests that the excess cars will use “public parking” in the neighborhood but doesn’t identify where that is. Those of us who live here know it is nonexistent. 36 hockey games that are now played at the hockey arena in Mendota heights will move the South Campus. They will be played mostly on Fri. and Sat. nights (Fig. 6, Table 7, p. 20, Appendix D), adding congestion, traffic, and parking requirements.</p>	<p>Events are expected to occur on weeknights and weekends when there is significantly more available parking on campus than weekday mid-day. Based on the event parking demand analysis on Page 28 of the Transportation Study, most events are expected to have a parking surplus on campus. For sporting events where a parking deficit is expected, several mitigation strategies and improvements were identified to reduce on-street public parking in the neighborhood and are summarized on pages 34-36. Modifications to the Summit Ave driveway and medians are no longer proposed due to the addition of the southeast Cretin Ave access point (see Appendix D for updated site plan).</p>

Comment	Response
	For more information, see the list of mitigation in the section titled Mitigation Plan .
<p>The document states that the Summit Ave./South Campus intersection is “expected to be modified to better accommodate” (p. 14, Appendix D) the buses and delivery vehicles that will use the roadway on the west side of the arena. That space is already constricted. The seminary grounds, grotto, and historic chapel are all located in this area. Access of these large vehicle to the relocated Lot O seems difficult without further removal of buildings in the future, particularly during the winter with snow accumulation. This should be addressed in the EAW. The modifications should also have described.</p>	<p>Based on analysis completed by the project proposer, truck access to the South Campus from Summit Avenue would require minor modifications to the median opening on Summit Avenue between Cretin Avenue and MRB. The modifications would not require the removal of additional building. Changes to the paving or median areas within Summit Ave, or expansion of the roadway, as those modifications would be considered impacts to the parkland division, and would require approval from the Saint Paul Parks and Recreation Board and compensatory parkland dedication elsewhere. Modifications to the Summit Ave driveway and medians are no longer proposed due to the addition of the southeast Cretin Ave access point (see Appendix D for updated site plan). The University will continue to explore the best routes for buses/vehicles both external and internal to the project site as the project design advances.</p>
<p>Possible mitigation strategies include scheduling more games on weeknights, overflow parking on the South Athletic Fields (which would seem to void guarantees on the integrity of the artificial turf fields), expanding the APF (which the documents states “may not” be in compliance with the CUP- shouldn’t we know this?- and would add to queuing as even more cars would enter and exit the ramp onto Cretin Ave.), and constructing a parking lot on the corner of Goodrich and the River Blvd which would result in taking down even more old oak trees along the Mississippi Flyway (p. 36, Appendix D).</p>	<p>Thank you for your comments. Expansion of the Anderson Parking Facility would require City approvals, including amendments to any event operations plans for the proposed arena to account for anticipated additional vehicles entering and exiting the site. Please note that the mitigation strategy noted in the comment is to schedule higher attendance games on weekends, not weeknights, as there is more available campus parking on weekends. Addition of two levels to the APF would not require an amendment to the campus CUP, provided that the top parking deck is 60’ or less above grade; stairwells, elevator overruns, equipment and parapets/railings are allowed</p>

Comment	Response
	<p>above the maximum building height. This would require a relocation of the existing University observatory located at the southwest corner of the ramp.</p> <p>The City of Saint Paul does not support construction of new surface parking at the NE corner of MRB and Goodrich Ave. The project proposer has also indicated that they do not intend to pursue a new parking lot at that location.</p>

Kathleen Deming

Comment	Response
<p>Please DO NOT ALLOW St. Thomas U. to build a ball field at Highland Bridge (or to acquire another square foot of property anywhere off campus) UNLESS they are willing to pay the full value of property tax. Any further thinning of our property tax base is going to further cost us property-tax payers, and citizens in this town are drowning in taxes. I'm living below the poverty line, and if I had the use of my tax money, I could afford to have done some of the badly needed repairs on my 102-year-old house. I believe that all church-affiliated colleges should have to pay tax on their acreage that is NOT PHYSICALLY OCCUPIED by their church or chapel. I don't use trash service as I still share with a neighbor, yet had to go begging for assistance to pay for medication. Before the city in 1984 broke the back of the private Recycling Unlimited, which provided recycling throughout the city – with the exception of one last small area which was being planned for, recycling was FREE. Now we get charged for it. SHAME! SHAME! SHAME! There are limits to citizens' budgets. There should be limits to the city's. STOP eroding the tax base! Stop charging us for things we don't use!</p>	<p>The proposed UST ballfields at Highland Bridge are not covered by the EAW. The City of Saint Paul City Council has determined that construction of ballfields at Highland Bridge, is permissible and amended the Master Plan for the site has been amended by the City Council accordingly. Beyond that regulatory role for the City, the construction of the proposed ballfields and associated facilities are an agreement between private parties.</p>

Meg Grove

Comment	Response
6 – Project Description	
<p>The EAW says that “Vehicular access to the facility will consist of loading zones via an access drive on the western boundary.” Please describe.</p>	<p>The full reference in the EAW is “Vehicular access to the facility will consist of loading zones via an access drive on the western boundary of the project site and via the termination of Grand Avenue in the northeast part of the project site.”</p> <p>The private extension of Grand Ave is proposed to be terminated with a turnaround just north of the Facilities Design Center to allow vehicular access to the Anderson Parking Facility, loading access to the Owen’s Science Hall loading dock, and access to the Recycling Center proposed in the alley west of the Anderson Parking Facility.</p> <p>An extension of the existing University access point to Summit Ave is proposed to run along the western and southern sides of the arena building, providing access to Lot O, and continuing to Cretin Avenue, just south of the Anderson Parking Facility. The new Cretin Avenue access location is designated for heavy loading/delivery vehicles, whereas the existing Summit Avenue access point is the primary vehicular ingress/egress for buses and Lot O users.</p> <p>An updated site plan is shown in Appendix D. The University will continue to explore the best routes for buses/vehicles both external and internal to the project site as the project design advances.</p>
7 – Climate Adaptation and Resilience	
<p>Continuing to build in an urban setting will exacerbate the Urban Heat Island. The EAW acknowledges that the area is “susceptible to extreme heat.” How does this comport with St. Thomas’ carbon neutrality goal, and with the City’s Comprehensive Plan’s Resilience and Urban Design goals?</p>	<p>The University of St. Thomas has stated a commitment to the proposed arena being built to a LEED-Silver certification, and designed to use less energy and water. While not currently required for a privately funded project, this is consistent with the goals of the City’s Climate Action and Resilience Plan. The project proposer has indicated the intent to include</p>

Comment	Response
	<p>the following measures, which will provide for increased reliability and energy efficiency in the arena, including:</p> <ul style="list-style-type: none"> • Redundant chiller design and incorporation of glycol into supply loop for all cooling coils will protect from freezing conditions and ensure systems remain operational. • Chillers will use next-generation refrigerants with low global warming potential. • The boiler system will include n+1 redundancy and freeze protection. <p>These efficiencies reduce heat emitted from the buildings and their HVAC systems and reduces indoor and outdoor exposure to heat, which is one of the impacts of the heat island effect.</p>
8 – Cover Types	
<p>UST says it will remove 76 mature trees to accommodate the complex, and that it will plant 50 new trees around the area. Also, "...St. Thomas has plans for at least 26 trees to be planted elsewhere on campus, outside of the EAW site area..." We heard at the 7/12 meeting from the project consultant that St. Thomas is "committed" to replacing the lost trees, one-for-one. New trees will take decades to become true replacements for the ones to be removed, which seems antithetical to carbon neutrality and Comprehensive Plan goals. How can this be a reasonable answer to the EAW question? Also, "has plans for" and is "committed to" are not very reassuring. This seems to leave room for St. Thomas to change its mind. Who holds them accountable to their plans and commitments? How does this response support the 2040 Comprehensive Plan Urban Design goals (promote high-quality urban design that supports...a healthy environment, and enhances the public realm; encouraging...private landowners...to</p>	<p>The City of Saint Paul does not require tree preservation at the project location. However, the University of St. Thomas has committed to replacing all trees removed for the project to at least a 1:1 ratio. The University's intent is to replace the trees within or adjacent to the approximately 6 acre site for the Arena project; however, space is limited at the arena site, so some tree replacement will occur elsewhere on the South Campus, and, if needed, on other parts of the campus.</p> <p>The terminology such as "has plans for" and is "committed to" was used to communicate the intent but to allow for the project design to further advance, as all tree replacement locations have not yet been identified.</p>

Comment	Response
<p>create and maintain privately owned public space (POPS) and green infrastructure...)?</p> <p>It seems convenient for UST to say it will put other trees elsewhere, just not on the South Campus site. Why would replacing the lost 26 trees to be placed outside of the EAW area be counted as a mitigation for purposes of this EAW? In fact, if UST wants to use the other parts of its campus to take up slack on any issue, doesn't that argue for a broader EIS?</p>	
10 – Land Use	
<p>Saint Paul has not yet adopted the new rules of the MRCCA. I am sure the City Planning Commission is aware of the inconsistent application of the CA-River Towns and Crossings District. Why does UST property receive this designation while the Saint Paul Seminary remains zoned a River Neighborhood? Furthermore, the property bordered by Cretin, Goodrich, Mississippi River Boulevard, Exeter, and Otis Avenues is located entirely within the MRCCA and is designated further as a Primary Conservation Area (PCA) under three categories: Bluff Impact Zone, Significant Existing Vegetative Stands, and Unstable Soils and Bedrock. The PCA designation is meant “to ensure that they are given priority consideration for protection.” All these considerations which have been in effect for almost 50 years by Governor’s Executive Order 79-19 appear to be ignored in the EAW.</p>	<p>The City of Saint Paul is currently working through the formal process to adopt new ordinances consistent with the MRCCA Rules promulgated by the Department of Natural Resources. The next step in the process is for the Planning Commission to formally respond to public comments and forward a recommendation to the City Council. The districts (River Towns Crossings and River Neighborhood) were designated by the MN Department of Natural Resources during the state rulemaking process and can only be changed through that same process. As noted in the EAW, building height limits on the University of St. Thomas Campus are governed by the existing Conditional Use Permit (CUP).</p> <p>The only Primary Conservation Area designated for the proposed project site is that for soil erosion susceptibility. The majority of the site is assigned an erosion potential of 200 out of maximum 1960. A portion of the site may fall into an area along Cretin Avenue rated with an erosion potential of 370 out of 1960. A smaller number indicates lesser erosion potential.)</p>
<p>I understand that the City does not count parapets and rooftop mechanical equipment toward the overall building height. What I don’t understand is why that is allowable. Could it be that difficult to design the building to completely meets height limits?</p>	<p>Thank you for your comment. The definition of building height is part of the general definitions in Chapter 60 of the Saint Paul Legislative Code, part of Title VIII, the Zoning Code. This provision describes methods for measuring building height based on roof type and for flat roofs has been</p>

Comment	Response
	interpreted to exclude rooftop equipment, stairwells, elevator overruns, etc. as they generally occupy a small portion of the roof area.
13 – Contamination/Hazardous Materials/Wastes	
<p>UST says it "may install a diesel generator to provide backup power to the arena as well as up to four additional future generators to feed the [school's] MicroGrid." Why would this be necessary? Instead of backup generators, what about batteries to store the power gained from the solar panels on various buildings on campus? Seems that burning diesel would be a step backward in terms of carbon neutrality and of the City's 2040 Comprehensive Plan.</p>	<p>A backup generator will be included in order to meet code requirements. The proposer has indicated that the project is evaluating ways to meet the University's sustainability goals through the design of the project including the relocation of existing solar panels currently located on top of McCarthy Gymnasium, which is slated for demolition as part of the project. Batteries would not have sufficient capacity to store the power necessary to service the arena in emergency situations. The University has stated that a decision has been made to eliminate connection to the Microgrid from the proposed project; and that therefore the diesel generators identified for backup power to the Microgrid will not be included in the project.</p>
14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)	
<p>The area could be habitat for the endangered Rusty Patched Bumblebee (which is the Minnesota State Bee), according to the EAW, but isn't because it is already "disturbed." However, there are efforts all around us to restore habitat. How is this response aligned with the City's 2040 Comprehensive Plan Urban Design goals, especially around promoting 'high quality urban design that supports ...a healthy environment and enhances the public realm' and 'visible green infrastructure landscape features, such as rain gardens...?'</p>	<p>The proposed project area is composed of approximately 4 acres of impervious surfaces, with the remaining areas lawn or landscaped areas. Areas of maintained turf grass and, because they do not are generally not considered, along with pollinator habitat due to the lack of flowering plants. Landscaped areas may or may not provide habitat, depending on the plantings. The project proposer has also committed to incorporating pollinator friendly landscaping/plantings into the project design.</p>
16 — Visual	
<p>The EAW says the project 'will conform with the City's regulations for building height...Adverse visual impacts are not anticipated.'" Who defines</p>	<p>The Arena building will be visible on the campus; particularly from Goodrich Avenue. Views from Cretin Ave Summit will be partially or almost</p>

Comment	Response
<p>what is “adverse?” What happens if they occur? Who monitors? Who corrects?</p>	<p>entirely screened by other buildings, and it will be well set back from Mississippi River Boulevard. The University has committed to matching the architectural design and materials of existing buildings on the campus. Building height will be required to comply with the limits in the campus CUP, and building design will be reviewed by the Saint Paul Heritage Preservation Commission (HPC).</p> <p>As noted in the comments, visual impacts can be subjective. The analysis and findings in the EAW are based on compliance with existing regulatory requirements.</p>
<p>17 – Air</p>	
<p>The EAW says, "The construction and operation of the project are not expected to generate objectionable odors." Objectionable by whose standards? Is anyone asking the people who live around the area? Is anyone planning how to monitor during construction and after the building opens? What if there are problems? Who is empowered take complaints or required to take some kind of action?</p>	<p>Per the Minnesota Pollution Control Agency (MPCA), Minnesota does not have a state odor rule.⁴ Accordingly, odor complaints are generally handled at the municipal (county or city/township) level. The City of Saint Paul investigates odor issues on a complaint basis.</p>
<p>18 – Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	
<p>The EAW lists "design strategies and other sustainability measures being considered for the proposed development to reduce emissions." <i>Considered?</i> Maybe considered, then tossed aside? Who is responsible for monitoring and ongoing mitigation/enforcement if there are problems?</p>	<p>The terminology “considered” was used to communicate the expressed intent of the project proposer to incorporate multiple strategies/measures to reduce GHG emissions. Per the project proposer, multiple options are under consideration but have not yet been finalized. The City as RGU(as well as other agencies responsible for reviewing permit applications) will consider proposed mitigation measures as part of project review and permitting.</p>

⁴ <https://www.pca.state.mn.us/air-water-land-climate/noise-and-odor>

Comment	Response
19 — Noise	
<p>In the Operational Noise section, the EAW says "The proposed project will potentially contribute to the existing campus noise. Further noise evaluation will be completed as design progresses..." This response seems inadequate. It supports what many neighbors fear because we've experienced it before: build first and worry about noise later - and only if someone brings it up. Later in that paragraph, the EAW says, "If the facility exceeds noise regulations, the project proposer will work with the city to identify potential mitigation options." Those of us who've lived here a long time recall when the Frey Science Building went operational. Switching on the massive exhaust fans on top of the building produced unbearably loud noise. It wasn't until more than a year after neighbors lodged numerous complaints that the school finally added sound muffling to the fans.</p>	<p>The project proposer has committed to conducting noise evaluation throughout the design process. This includes analysis of building wall sections (thickness of insulation, etc.), location and screening of mechanical equipment, and selection of broadcast and audio systems within the arena. The project proposer is committed to completing an operational noise study to evaluate noise from the completed building and identify any needed noise mitigation. The project will be required to meet City of Saint Paul noise ordinances, which are the most restrictive allowed under state law.</p>
<p>The EAW has also overlooked the noise generated by additional traffic generated by the project. Residents of the neighborhood have already experienced significant traffic noise increases resulting from the Grand/Cretin intersection modification and from the Highland Bridge development.</p>	<p>The traffic increase on adjacent roadways is not expected to generate a significant noise increase as defined by state rules.</p>
<p>We get noise – we live in an urban area. Please explain how so much additional noise generated by one neighbor must be the price the rest of us pay, particularly when the project seems to be incongruent with St Thomas' and the City's stated goals and values (carbon neutrality, 2040 Comprehensive Plan Urban Design, Resiliency, and Community Health focus areas).</p>	<p>Thank you for your comment. The University is committed to completing a noise study to evaluate potential noise from the building and to identify noise mitigation options as needed. The project will be required to meet City of Saint Paul noise ordinances and MPCA regulations for noise. Some additional traffic noise will be generated during peak times for events held in the Multipurpose Arena. The traffic increase on adjacent roadways will not generate a significant noise increase as defined by state rules.</p>
20 - Transportation	

Comment	Response
<p>Expansion of the Anderson Parking Ramp is mentioned as a “potential improvement in the Traffic Impact Analysis,” though nothing is planned or funded “at this time.” Considering St. Thomas’ goal of carbon neutrality by 2035, and the City’s Comprehensive Plan goals of minimizing traffic, why is this even on the table? Why would something that only encourages driving be a good idea? Also, based on discussions with City and project consultant staff at the 7/12 public meeting, assumptions used to calculate traffic at the ramp seem to be best case scenarios. What about when the weather isn’t optimal? What about when vehicles break down or collide in and around the ramp? Explain how long wait times – whether under optimal or suboptimal conditions – won’t result in lots of idling vehicles, and environmentally harmful emissions in this heavily residential area? With so much emphasis on through put of vehicles, it is difficult to see how the ramp log jams are consistent with St. Thomas’ carbon neutrality goals, or with the City’s 2040 Comprehensive Plan Resiliency goals (reducing carbon emissions, improving environmental sustainability), and Urban Design (limit stand alone parking uses, and encouraging private landowners to create/maintain green infrastructure).</p>	<p>In addition to the possibility of an expansion of the Anderson Parking Facility, several mitigation strategies and improvements were identified as part of the Transportation Study, including facilitation of travel modes other than private vehicle. The parking ramp operations were modeled to represent maximum capacity event conditions. Note it is not standard practice to model emergency situations as a part of the traffic analysis.</p> <p>For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>What are assurances that Goodrich Avenue will not become the offsite parking lot and backdoor entrance to the project both during construction and operations?</p>	<p>On the south side of Goodrich Avenue, parking is by permit only between Cretin Avenue and Woodlawn Avenue, and completely banned between Woodlawn Avenue and Mississippi River Boulevard. Available parking on the north side of this stretch of Goodrich Avenue is likely to be utilized during events at the proposed arena, particularly events with projected higher attendance. No access is proposed during construction and operations.</p>
<p>The EAW says that "Maximum basketball events may occur one to two times per year. Maximum hockey events are expected to occur two to four times per year..." One wonders - why build at all? As we've heard from St. Thomas' own staff, "you don't build for Easter Sunday."</p>	<p>Per the University, their current athletic facilities for basketball and hockey do not meet all NCAA Division I standards., and the arena was designed by the project proposer both support to meet NCAA regulations and conference expectations for NCAA Division 1 requirements. Also, while the</p>

Comment	Response
	comment is appreciated, please note that the EAW is not intended to address the need for the proposed project.
<p>However, we've also heard from St. Thomas staff that they plan to market use of the complex all year round, yet the environmental impact of those events - whatever they may be - are not included in this EAW, which makes it incomplete. Why not make some assumptions and put those into the calculations?</p>	<p>Per the project proposer, the primary scheduled, reoccurring use of the arena is for basketball and hockey events, and the projected frequency of events was the basis of the EAW transportation analysis. The largest events considered (as noted in the comment) represent the greatest impact, from a traffic and parking perspective, likely to occur. "Non-athletic events" have only been generally described by the project proposer. Events for students would likely have less impact on traffic and parking than hockey and basketball games due to the large student to non-student ratio. The City of Saint Paul is requiring the University of St. Thomas to provide a list of non-sporting events likely to held at the proposed arena within six months of project approval, should it be approved. Large "non-sporting" events will be treated similar to large sporting events.</p>
<p>The Traffic Study's traffic volume data depends on traffic counts for March 30, 2023, just before a major snowstorm (March 31-April 1). Given how that storm was forecasted and hyped, we believe the volume of traffic was significantly lower than normal. The Parking study also discounted the snowstorm as a factor. I strongly suggest updated parking and traffic studies to truly reflect what is/will happen.</p>	<p>The traffic counts cited in the comment were compared to counts from a typical day in the study area drawn from MnDOT traffic detector data measured at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of a typical day for the study area. Based on this, no adjustments were made to the March 30, 2023 counts.</p>
<p>Continuing on the topic of the traffic study, it includes mention of putting a surface lot on Mississippi River Boulevard as a way to mitigate parking issues. This cannot be acceptable! Certainly THAT would trigger more scrutiny because of the MRCC.</p>	<p>This construction of a new surface parking lot at the southwest corner of the UST South Campus was identified as a potential way to provide additional off-street parking as a strategy for reducing demand for parking on neighborhood streets during larger events. The City of Saint Paul does not support this approach, and the University of St. Thomas has agreed to not pursue this approach.</p>
<p>21 – Cumulative Potential Effects</p>	

Comment	Response
<p>The EAW asks UST to “Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes”... The EAW says “The University of St. Thomas does not have any board approved plans for new building construction at the Saint Paul campus. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any future building projects to contribute to the understanding of the cumulative potential effects.” Neighbors have heard this numerous times over the years, always some version of “there are no plans.” UST has stated that it is in an arms race to attract students from the dwindling age cohort, and that moving to Division 1 athletics is a marketing strategy. The EAW should include some assumptions about future development since even UST indicates it will occur. They have already said development of the East and West blocks of Grand Avenue is next. The constant drip-drip-drip of development while hiding behind statements about not having any “board approved plans” insults the neighborhood and the City. Why not treat all of St. Thomas as it really is – a single site - and require a more thorough study of the impacts of its building program with a comprehensive Environmental Impact Statement?</p>	<p>The subject of the EAW is the proposed project, the proposed arena. An assessment of cumulative potential effects is based on known, unrelated projects planned or underway at the time of the EAW. The Schnoecker Center, while under construction at this time, was analyzed as part of existing conditions.</p> <p>In order to conduct an environmental review, the Responsible Governmental Unit (in this case the City of Saint Paul) must be presented with a proposed project. Any new projects proposed by the University that exceed an EAW or EIS threshold as defined by MN State Rules 4410, would be required to complete the appropriate environmental review.</p> <p>If the anticipated redevelopment of the East and West blocks of Grand Avenue exceeds an EAW or EIS threshold as defined by MN state rules, the University would be required to complete an environmental review. The University would also need to meet the regulatory permitting and approval processes.</p>

Joan Haan

Comment	Response
<p>20 - Transportation</p>	

Comment	Response
<p>I recently had a lengthy conversation with Jerome Benner, the new neighborhood liaison. He is interested in finding ways to make traffic and routing more amiable/ less negatively impacting neighborhoods.</p> <p>Some ideas:</p> <ul style="list-style-type: none"> - Signage, cones, directing traffic - Encouraging walking, biking, carpooling as pro environmental action - Email Schedule of events in advance to neighbors so we can plan accordingly – text alerts for those who opt in. - Expansion (higher levels) of the exiting Anderson parking structure – that will need variance from the city and may be the best solution for additional parking vs. neighborhood parking and traffic. 	<p>Thank you for your comment. These suggestions will be considered as part of event management planning.</p>

Laura Halferty

Comment	Response
<p>20 - Transportation</p>	
<p>I have lived in the neighborhood for about 15 years and have been supportive of St. Thomas, it's variance requests, and it's building projects. However, I am very concerned that the planning for the new hockey arena does not adequately address parking. I feel very strongly that parking solutions need to be identified and approved before the arena is built. We already have parking issues in the neighborhood and the city has not</p>	<p>Several mitigation strategies and improvements were identified as part of the Transportation Study that could be effective. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
consistently enforced the permits in place to alleviate the dearth of parking.	
Existing traffic on Cretin has resulted in numerous accidents and fatalities. Additional traffic (especially at high speeds) on river road is concerning as well given all the bicycle and foot traffic.	Thank you for your comment. For more information, see the list of mitigation in the section titled Mitigation Plan .

Virginia Housum

Comment	Response
<p>As several people have pointed out at the public meetings, UST failed to engage with its neighbors effectively and has pushed forward with its proposed arena, without taking into account its effect on the area. The attendance at the public meetings has been sparse, and calls to neighbors has disclosed that many of them are unaware of the arena proposal. This is occurring despite UST stating explicitly at the June 12 meeting that the quality of the neighborhood is a valuable amenity to UST’s efforts to recruit new students. I am certain that had UST engaged in a real public process, neighbors would have developed ideas to mitigate the damage the arena will cause to the neighborhood if it is built as disclosed in the EAW. Thus, the very quality of the neighborhood benefitting UST is being jeopardized by UST’s failure to engage appropriately with its neighbors. As I have tried to talk to my neighbors about the arena, many of them have not heard of the proposal or, if they have heard of it, believe that UST is a neighborhood bully who gets its way, no matter what. The arena proposal could have been improved with neighborhood input.</p>	<p>Thank you for your comment. The City of Saint Paul, as the RGU, was responsible for official notifications regarding the EAW. This included providing a press release, publishing notice of the availability of the EAW in the Pioneer Press, sending out notice via the City’s (electronic) Early Notification System, and hosting a public meeting during the public comment period. Staff also attended a District Council meeting. The City always encourages any project proposer (whether the project is subject to an EAW or not) to conduct direct community outreach. The University notes that the project was discussed at numerous District Council meetings, and that the University hosted multiple public forums to present the project.</p>
<p>The EAW repeatedly references that UST “is considering” ways to improve the project. See for example, the description of landscaping to be used to limit adverse climate effects (page 7); UST “is investigating” ways to minimize tree removals (page 9); and the lengthy descriptions of parking mitigation strategies (pages 34 through 40). Implicit in these sections</p>	<p>The terminology such as “is considering” and “is investigating” was used to allow for the project design to further advance and incorporate the appropriate design features. The project is in the early design phase and the</p>

Comment	Response
<p>is the only conclusion that a reader can draw: UST is rushing through this EAW process without making commitments on exactly what it is going to do. The whole EAW is premised on vague promises of improvements which may or may not come to fruition. The neighborhood’s experience with UST has been that it often does not follow through on ambiguous aspirational goals. As a result, neighbors will not be satisfied unless actual detailed and enforceable commitments by UST are put in writing.</p>	<p>proposer is evaluating numerous measures to limit impacts and work toward the University’s clean energy goals.</p>
<p>8 – Cover Types</p>	
<p>UST has stated at public meetings that approximately 75 trees on the site will be replaced by the arena, but that these are young, small trees in parking lots. However, a visual inventory of the site disclosed that there are dozens of mature trees, including trees approximately 50 years old, which would be lost. UST has pledged that a very large cottonwood tree on the west side of the site near the top of the ravine going down to the Mississippi River will be saved, but there are large trees in the area between the seminary and Cretin Hall which will be lost as well. It is incumbent on UST to agree in writing to replace the trees which will be destroyed, on a ratio of at least 4:1, to compensate for the loss of the air filtration and carbon sequestration trees provide. Further, the new trees should be planted on the south campus, where the greatest damage from the new arena is going to occur.</p>	<p>Currently there are no tree preservation requirements in the City of Saint Paul at the project location. However, the University of St. Thomas has committed to replacing all trees removed onsite to at least 1:1 ratio. The University’s intent is to replace the trees within or adjacent to the approximately 6 acre site for the Arena project, but since there is limited space within the Arena project area they will first replace them elsewhere on the South Campus and then look at other areas within the remaining portions of campus for tree planting opportunities if needed.</p>
<p>14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>The EAW states that “no impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat....no impacts to the nearby Mississippi River are expected” (EAW, page 27). Somehow, Kimley Horn failed to recognize that the Mississippi River is the most important flyway for migratory birds in the country and is protected by international treaties. The decline in bird populations has been documented over and over again over the last 20 years. Birds do not simply fly over the</p>	<p>The project site is located within the Mississippi River Twin Cities Important Bird Area (IBA)⁵. The Mississippi River IBA includes the Mississippi River and its adjacent floodplain forest and upland areas extending for 38 river miles through 4 counties from Minneapolis to Hastings. According to the MN DNR, IBAs are a voluntary and non-</p>

⁵ <https://netapp.audubon.org/iba/Reports/2421>

Comment	Response
<p>river; but use nearby areas as resting spots and places to replenish themselves. Anyone who has spent any time in the immediate area of the river could explain that the number of migrating birds changes during the spring and fall. Of great importance, the implications for bird populations easily could be mitigated if UST retained an appropriate consultant familiar with bird populations and mitigation methods, such as bird friendly glass in the arena, and care and attention given to lighting in the arena, which could reduce bird collisions with the building. The building should not be permitted to go forward without a commitment by UST to undertake ALL necessary steps to mitigate adverse effects on bird populations.</p>	<p>regulatory part of an international conservation effort to bird populations⁶. The information above was added as a correction to the EAW after receiving recommendations from the MN DNR. As indicated in Section 14.a. of the EAW, the site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation.</p> <p>The project will be required to comply with applicable City of Saint Paul lighting and bird-safe glass ordinance language. Fixture modeling and photometric analysis will be completed for all site and building lighting to analyze light levels for the project.</p>
20 – Transportation	
<p>In particular, the traffic study contains many errors and people who are in the neighborhood day in, day out (in contrast to Kimley Horn’s one day traffic count on a snowy Saturday in March) could have told Kimley Horn of the real traffic situation.</p>	<p>Thank you for your comment. As stated on Page 4 of the Transportation Study "To determine if the traffic counts were representative of an average day in the study area, MnDOT detector data was reviewed at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of an average day for the study area, therefore, no adjustments were made to the counts.</p>
<p>The EAW is fatally flawed in failing to consider the future growth in traffic on Cretin Avenue from the continuing buildout of the Highland Bridge development. Beyond the issue of the number of crashes discussed by the EAW, Cretin Avenue has become a crowded speedway from Highland Bridge to I-94. Mitigation is desperately needed, before there are pedestrian collisions along Cretin Avenue. At the very least, a pedestrian activated blinking light or</p>	<p>Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing</p>

⁶ <https://www.dnr.state.mn.us/iba/index.html>

Comment	Response
<p>roundabout will need to be installed at Goodrich and Cretin. Other traffic calming will also be needed, perhaps by finding a way to narrow Cretin Avenue.</p>	<p>pre- and post-event volumes and included trip generation estimates for the Highland Bridge development."</p> <p>The Transportation Study recommended that the Cretin Ave and Goodrich Ave intersection be monitored and traffic control officers or campus crossing guards be utilized as needed if the crossing is heavily utilized during events.</p> <p>Pedestrian safety is important to the City and the project proposer. The City and the proposer will continue to evaluate pedestrian safety improvements at the intersections adjacent to the stadium during the design phase.</p>
<p>I travel north on Cretin Avenue and turn east on Marshall about three mornings a week, between 7 AM and 9 AM. Notwithstanding the conclusion in the EAW that the queues on westbound Marshall Avenue only develop in the afternoon (page 10), cars are usually backed up on westbound Marshall Avenue for about two blocks in the morning. The EAW does not even consider the traffic impact westbound at that time of day.</p>	<p>Thank you for your comment. Westbound queues were observed during data collection efforts and in the traffic analysis modeling to extend near Finn Street during the a.m. peak hour. Note event traffic—the focus of the EAW—is not expected to overlap or impact a.m. peak hour operations.</p>
<p>The traffic study done on March 31, during a snowstorm, and on Saturday April 1 (page 11) is not representative of traffic on Cretin Avenue. Traffic always starts later on Saturdays, and after a snowstorm was doubtless delayed even longer. This appears to be a material skewing of the data to back into UST’s desired conclusion that the parking problem it is foisting onto its neighbors is not significant. However, there are a significant number of drivers speeding up and down Cretin Avenue at all times of the day and night, and attention to pedestrian crosswalks is inconsistent. The City should not rely on the shallow analysis prepared by Kimley Horn in the EAW but should undertake its own traffic study and develop a meaningful plan to reduce traffic on Cretin, or effectuate calming of the traffic on that arterial.</p>	<p>As stated on Page 4 of the Transportation Study, "To determine if the traffic counts were representative of an average day in the study area, MnDOT detector data was reviewed at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of an average day for the study area, therefore, no adjustments were made to the counts."</p> <p>And Page 11, "There was a snowstorm on Friday night (3/31) into Saturday morning (4/1) during the SRF parking</p>

Comment	Response
	<p>counts. However, the storm started after the Friday afternoon counts and the Saturday weather (40 degrees and sunny) generally cleared the roadways by the time of the Saturday afternoon counts, therefore, the parking counts as it relates to event availability are considered representative of typical weekend conditions for the campus area.”</p> <p>Traffic safety and enforcement is an ongoing priority of the City. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>The EAW reports a loss of 264 parking spaces on the UST campus from the arena project, without taking into account significant events, like commencement, basketball games, and hockey games. The EAW fails to mention that UST already has asked the city to eliminate the parking spaces along the east side of Cretin Avenue north of Summit Avenue, so the actual shortfall in spaces is probably closer to 285. This is another example of UST holding back crucial information needed for a meaningful EAW. The non-event solutions proposed by UST will be difficult to measure, and UST needs to develop not only accountability for these proposed steps, but a definite plan for what it will do in a Plan B if those steps fail. UST needs to solve its parking problem on its own property, and not by creating congestion and inconvenience for its neighbors. At the very least, in those neighboring areas where parking is only by permits issued to residents, the hours of parking restrictions must be extended throughout the times of anticipated events, i.e. probably to midnight.</p>	<p>Thank you for your comment.</p> <p>The loss of 264 parking spaces on the UST campus was accounted for in both non-event and event parking demand analysis; see Page 17 for the non-event conditions and Page 28 for event conditions.</p> <p>The request by UST to the City to remove the parking spaces along the east side of Cretin Ave, north of Summit Ave, was in response to neighbor requests to improve traffic conditions along Cretin Ave. The City of Saint Paul currently has no plans to remove the parking spaces along Cretin Avenue, therefore, the parking spaces were included within the parking and traffic analysis.</p> <p>Requests can be made directly to the City Public Works Dept to extend the hours of parking restrictions. In addition, this strategy (alterations to current residential parking permit district hours of applicability) is suggested to be included in the required comprehensive parking management plan. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
<p>The assumptions made in the EAW about parking demand during events (a shortfall of up to 740 spaces), as well as the number of events, are unrealistic (EAW, page 28). In addition, the projections in the EAW about the time it will take to exit the Anderson Parking Facility (“APF”) are inconsistent with my experience at other parking facilities in the city. I feel certain that when the APF is full, it will take over an hour to vacate the APF, especially in light of the traffic light at Cretin and Grand Avenues, and the likelihood of pedestrians crossing both streets at the exact same time.</p>	<p>Thank you for your comment.</p> <p>The event parking demand analysis was based on the modal split assumptions (Table 10 and Page 24 of Transportation Study) discussed and confirmed with City staff. The event frequency (or number of events) was based on research into comparable athletic programs from the previous athletic calendar year. This research also informed estimated event attendance, and is shown in Figure 7.</p> <p>For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>In the EAW, Kimley Horn fails to suggest mitigation strategies which do anything other than dump the problems which will be created by the arena on UST’s immediate neighbors. With respect to the heavily impacted intersection of Goodrich and Cretin, all that it offers is a one sentence comment: “The number of pedestrian crossings in this location will be heavily dependent on where event patrons are parking” (page 33). This alone proves the inadequacy of the EAW.</p>	<p>Thank you for your comment. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>UST has explicitly stated at public meetings that the wooded area at the northeast corner of Goodrich Avenue and Mississippi River Boulevard would not be affected by the construction of the arena. However, in the EAW, in a discussion on mitigation for lost parking from the project, Kimley Horn recommends construction of a surface parking lot in the southwest quadrant adjacent to Mississippi River Boulevard (page 36). This parklike setting contains over two dozen mature trees, and should be viewed as a public amenity, as it is used every day, all year round, by many residents of the City of Saint Paul. UST MUST commit in writing to leave this parcel, of approximately 5 acres, in the same condition it is now, and to solve the parking problem of its own making elsewhere. The city must bear in mind that UST owns the entire two block area bounded by Summit Avenue, Cleveland Avenue, Grand Avenue, and Cretin Avenue. It has a small parking lot on the northwest corner of Grand and Cleveland. UST can solve its parking problem by building a structure on that site or</p>	<p>This was only one potential strategy of many that were identified in the Transportation Study to help offset public parking in the neighborhoods during larger events. This specific location for a surface parking lot is not supported by, and no longer being considered as a mitigation strategy by, the City. The University has also indicated that they do not intend to pursue this option.</p>

Comment	Response
<p>elsewhere on that block, but the approximate five acre plot at Goodrich and Mississippi River Boulevard must be off the table now and in the future. As indicated above, only a detailed and enforceable written instrument will satisfy this requirement.</p>	

Daniel Kennedy

Comment	Response
<p>15 – Historic Properties</p>	
<p>The portion of Summit Avenue adjacent to St. Thomas is part of the Summit Avenue West Heritage Preservation District, which is on the National Register of Historic Places. Eight of the eleven houses on Summit Avenue north of the South Campus, and five of their garages, were identified as contributing structures to the historic district in the historic district registration form.</p> <p>As noted above, Summit Avenue itself is one of 14 parkways is the City of St. Paul listed in St. Paul Legislative Code, Section 145.02, entitled “Parkways where trucks are prohibited.” Summit Avenue originally had a 100-foot right of way, but the property owners on both sides of Summit Avenue donated 50 feet of their frontage from Lexington Parkway to the Mississippi River to create a 200-foot right of way and allow space for the medians that exist today. It can perhaps be assumed that the donors did not wish to bring truck traffic 50 feet closer to the homes.</p> <p>At the same time that St. Thomas is planning to send dozens of buses and trucks into a historic district, the university plans to demolish Cretin Hall to create space for an arena. Architect Cass Gilbert, who designed three state capitals (including Minnesota’s), the U.S. Supreme Court building, and other notable structures, designed three residence halls for the St. Paul Seminary: Grace Hall, Loras Hall, and Cretin Hall. St. Thomas recently demolished Loras Hall to make way for Schoenecker Hall, currently under construction. Cretin Hall was erected in 1894 and transferred in 1987 to St. Thomas for use as a</p>	<p>Thank you for your comment. The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Summit Avenue is longer being considered for truck/bus access to the proposed arena. Access will instead occur via Cretin Avenue. Previously approved truck access from Summit Ave to Schoenecker will still occur.</p> <p>A small portion of the proposed arena (approximately the northern 10 feet of the building as designed) falls within the West Summit Avenue (National and Local) Historic Preservation District. The design of the building will be reviewed by the Saint Paul Heritage Preservation Commission.</p>

Comment	Response
<p>dormitory. It houses 90 students on five levels. The EAW identifies Cretin Hall as eligible for nomination as a historic structure.</p>	
<p>20 – Transportation</p>	
<p>Any analysis of the environmental impact of a Division I sports arena should discuss the basic requirements for such an arena to function successfully. Without including the totality of those who need to access the arena, any discussion would be misleading and could vastly understate the impact on the arena’s environment. This is a fundamental flaw of the EAW, which does not include such a discussion. Using comparisons to other arenas (adjusted for different seating capacities, where appropriate), the nominal requirements for a 4,000-5,500 seat hockey and basketball arena would be as follows (<i>see Appendix C for exhibit</i>).</p> <p>It is important to note that a 5,500-seat arena does not cap attendance at 5,500 spectators. St. Thomas currently plays basketball in Schoenecker Arena, which has 5,000 seats. Attendance ranges as high as 6,500 spectators (presumably with many standing). EAW, App. D at 19.</p>	<p>Thank you for your comment. The reference to “Appendix C” is understood to refer to the concerns raised by the commenter regarding changes to traffic patterns for access to and circulation within the South Campus. These comments are responded to below.</p> <p>In regard to attendance, the primary scheduled, reoccurring use of the arena is for basketball and hockey events and is the focus of the EAW transportation analysis. The events studied represent a maximum scenario from a traffic and parking perspective. The potential scope of "non-athletic events" have only been generally described by the project proposer. As mitigation, the City is requiring a more detailed listing of the planned events prior to occupancy of the arena, if approved for construction. This listing will be updated as needed on an annual basis. Event and parking management requirements will apply to non-sporting events based on anticipated attendance and impacts..</p> <p>The attendance of existing St. Thomas arenas comment is inaccurately stated. As mentioned on Page 19 of the Transportation Study:</p> <p>"Men's/women's basketball and women's volleyball games are currently played at Schoenecker Arena, which has a seating capacity of approximately 2,000 event patrons."</p> <p>and</p>

Comment	Response
	<p>"Men's football games are currently played at O'Shaughnessy Stadium, which is located in the north campus and has seating capacity of approximately 5,000, but often has attendances that range from 4,000 to 6,500."</p>
<p>Also significant is that "average attendance" and "typical schedule" figures in the EAW are based on past data, not upcoming schedules. For example, the St. Thomas men's hockey team hosted home games in 2022-23 against Michigan Tech, Bemidji State, Bowling Green, Northern Michigan, and Lake Superior. EAW, App. D at 22. None of these teams would have a sizable fan base in the Twin Cities. In 2023-24, the schedule includes home games against St. Cloud State, Minnesota State-Mankato, and University of Minnesota-Duluth, each closer to St. Paul and with established hockey programs. Attendance numbers will surely grow next season.</p>	<p>As mentioned on Page 21 of the Transportation Study, attendance projections were based on similar programs within UST's conference and excluded UST's attendance given their current facility capacity restrictions and recent transition to Division-1 sports.</p> <p>Also noted on Page 21, "Men's hockey programs generally have two (2) to four (4) higher attendance games per year" which should account for schedule fluctuations from year to year.</p> <p>Per the mitigation required by the City of Saint Paul as RGU, event attendance and traffic and parking impacts will be monitored on an ongoing basis, with frequency of monitoring at the discretion of City staff.</p>
<p>The site plan calls for changes in the traffic patterns inside the South Campus, most notably the elimination of direct access from Cretin Avenue (at Grand Avenue) to every part of the South Campus other than Owens Science Hall and Anderson Parking Ramp. Other buildings on the South Campus (Anderson Arena, Grace Hall, Biz Refectory, Brady Education Center, O'Shaughnessy Science Hall, and the new Schoenecker Hall) will have their access to Grand Avenue eliminated. Access will instead be through the Summit Entrance. All cars, delivery vans, service vehicles, garbage trucks, and other vehicles that entered from Cretin would be required to drive down Summit Avenue and into the Summit Entrance.</p>	<p>Thank you for your comment. Access to Biz Refectory and Brady Education Center will continue to be as it exists, from Goodrich Avenue. Access to O'Shaughnessy Science Hall will also not be changed. The primary pedestrian and shuttle access to the proposed arena will occur via the Grand Avenue extension. Service vehicle access to Schoenecker will continue to be via the previously approved access from Summit Avenue. Service access to the proposed arena for larger trucks and buses will be from a new access point from Cretin Avenue. Any needed service vehicle access to Grace Hall will occur via the existing Summit Avenue or proposed Cretin Avenue access</p>

Comment	Response
	<p>routes. The new access from Cretin Avenue will be reviewed in more detail as a part of the site plan review process.</p>
<p>Buses: The EAW does not discuss bus access, but St. Thomas officials have indicated that buses accessing the arena will drive west on Summit Avenue to the existing entrance of the St. Paul Seminary (“Summit Entrance”), then drive south through the Seminary to a new road that will bring them past the west side of the arena to a south entrance to the arena, where passengers will unload. The distance from the arena to Cretin Avenue is approximately 250 feet. Instead, the buses will drive 0.5 miles to Summit Avenue and then east to Cretin Avenue.</p> <p>Problems: Parking: The site plan includes space for one or two buses to park next to the arena. That is not sufficient for the number of team and fan buses that will need to park. Because they will not be able to park at the arena, they will have to exit the South Campus, leaving out the Summit Entrance and re-entering Summit Avenue. Many will likely park (illegally, due to full-time permit parking restrictions) on westbound Summit Avenue west of the median break to the Summit Entrance. There — or any other place in the neighborhood they can find parking — they will idle to keep the bus warm during the winter hockey and basketball games. This would be true no matter where fans loaded and unloaded, because the site plan lacks bus parking.</p> <p>Access: Buses will enter the South Campus to unload, leave due to lack of parking, re-enter to load, and leave again with passengers. For each game, buses will traverse Summit Avenue four times. With 5 to 12 total buses required for each game, the burden on Summit Avenue will be tremendous: noise, exhaust, and the danger of having up to 48 total bus</p>	<p>The quantity of team buses for each event in the arena (football games generally require more buses) is assumed to be one visiting team bus based on past events. The project proposer has modified the proposed project to provide access for larger vehicles (buses and large delivery vehicles) from Cretin Avenue. Interim parking for buses during events will be further evaluated as part of any permitting processes, including site plan review, but will not occur directly adjacent to residential use. The number of buses at events will be monitored per mitigation required by the City of Saint Paul as the RGU. Buses and trucks may need to exit the site via the existing connection to Summit Ave., but in doing so would only traverse east-bound Summit (adjacent to the campus and not residences) to Cretin.</p> <p>Shuttle service from remote parking lots for event patrons is being required as parking mitigation. This mitigation measure is also suggested on Page 36 of the Transportation Study. While shuttle services will help reduce parking impacts to the surrounding neighborhood as well as the number of vehicles traveling near the arena,</p>

Comment	Response
<p>trips on Summit in just a few hours. This would be repeated game after game. Even if the burden were one fourth this much, it would be far too great.</p> <p>Parkway Restrictions: The St. Paul City Council has designated Summit Avenue a “parkway.” Vehicles driving on parkways may not exceed 9,000 pounds. St. Paul Leg. Code §§145.02, 170.07. All of the various trucks and buses accessing the arena through the Summit Entrance vastly exceed the parkway limit of 9,000 pounds. Their use of the parkway is contrary to the City’s aim to achieve “the maximum enjoyment by all persons and protect[] the natural resources therein.” St. Paul Leg. Code §170.10.</p> <p>Headlight Effect: Because basketball and hockey are winter sports, the headlights of trucks and buses leaving through the Summit Entrance will be on and aimed straight at residential properties on the north side of Summit Avenue. Below is an illustration of the effects of the headlights (<i>see Appendix C for exhibit</i>).</p> <p>The effect of up to 24 buses leaving the Summit Entrance per game would add to the impact described above. Adding the food, beverage, trash and recycling trucks would further compound the effect. The site plan also includes 38 parking spaces for cars, meaning within a few hours for every game, more than 60 vehicles would aim their headlights directly across the street at residential properties (the figure shows the house directly across from the Summit Entrance, but as the vehicles turn onto Summit Avenue, their light would be shared with the neighboring residences as well).</p> <p>Trucks: The site plan shows that the sole access to the arena is through the Summit Entrance, meaning that food vending trucks (Sysco/US Foods), franchise food supply trucks (Subway/Domino’s), beverage trucks (Coca-Cola/Pepsi, perhaps beer suppliers), and dumpster haulers for trash and recycling would all travel west on Summit Avenue past houses, enter through the Summit Entrance, drive through the Seminary and around the arena, then exit in the reverse direction, back to Summit and past the same houses. At approximately eight vehicles per game, that constitutes 16 trips down Summit Avenue.</p> <p>Other Uses: The EAW focuses on Division I sporting events, but St. Thomas intends to use the arena for far more than that. University convocations and commencements, high school and youth sports, and conventions are also planned for the arena. EAW, Appendix D, at 2. Those events will expand the six-month basketball/hockey schedule (late September to</p>	<p>no detailed shuttle service, routing plans, or pick-up/drop-off locations have been identified at this time. Any visiting team shuttle services would need to be coordinated with the University of St. Thomas for routing and pick-up/drop-off locations.</p> <p>All delivery vehicles would be planned to occur outside of event periods, presumably during the morning hours of weekdays. The project proposer will need to finalize service vendors to specify scheduling.</p> <p>Based on the likely number of service vehicles/buses exiting to Summit Avenue during nighttime hours as described in this response, the instances of headlights shining on Summit Avenue residences when these vehicles exit to Summit is likely to be far less frequent than contemplated in the comment.</p> <p>For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
<p>early March) to fill the calendar year. The conventions alone would bring higher truck traffic to Summit Avenue than even the largest of sporting events due to the number of individual presenters who will be setting up booths and displays.</p> <p>Parkway Restrictions: All of the trucks needed to service the arena far exceed the 9,000 pound-limit set forth in the St. Paul Legislative Code.</p> <p>Headlight Effect: All of the trucks would produce the same headlight effect, adding 8 more trips to the 24 times that buses leave the Summit Entrance - <i>per game</i>.</p> <p>Cars: The EAW states that 38 surface parking spaces will be available next to the arena. Their only access will be through the Summit Entrance. They are permitted to drive on the parkway, but that does not diminish the fact that 38 vehicles will drive each way to the arena, adding 38 pairs of headlights to the headlight effect and 76 total trips past the houses on Summit Avenue - <i>per game</i>.</p> <p>Available Alternative: To comply with the St. Paul Legislative Code, St. Thomas could easily route vehicles bound for the South Campus through the Cretin/Grand entrance that has been the main entrance to the Seminary since its founding. Unlike Summit Avenue, parallel Grand Avenue is a truck route. St. Paul Leg. Code §146.04. The Grand Entrance is just 250 feet from the arena. The Summit Entrance could be limited to access to the St. Paul Seminary.</p>	
<p>Currently, St. Thomas does not provide nearly enough off-street parking for its needs. The spill-over effect is great, with the on-street parking surrounding the campus fully occupied at most hours of the day. The university’s tradition of spilling over its geographical limits has spawned permit-parking zones adjacent to campus. As students and staff park outside those zones, the ring of permit-parking zones has increased in diameter around the campus. St. Thomas’s modest supply of parking simply does not meet its current needs due to commuting students and staff. This parking shortage will increase, as St. Thomas administrators have indicated a desire to increase total enrollment by 10% in the upcoming years.</p>	<p>Several mitigation strategies and improvements were identified to help reduce on-street public parking in the neighborhoods during events and are summarized in detail on pages 34 - 36 of the Transportation Study.</p> <p>For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
<p>In proposing its arena with a capacity of 5,500, St. Thomas does not plan to add any off-street parking to its supply. Instead, it eliminates 264 spaces right at the arena site where they would be most needed. EAW at 35.</p> <p>The EAW’s solution is to have its spectators park in the surrounding residential neighborhood. A map of the permit parking zones shows the weaknesses of the permit parking zones, some of which require a permit only on weekdays. It is unlikely, however, that those zones would remain unchanged after spectators consistently fill those streets with cars at the same times (Friday and Saturday nights) when the residents may wish to have visitors who need on-street parking. A restriction of the permit parking zones would leave St. Thomas with an arena that cannot rely on nearby on-street parking.</p> <p>Available Alternative: To provide parking for its arena, St. Thomas could expand its Anderson Parking Ramp laterally southward along Cretin Avenue. This would impact its existing softball and soccer fields, but softball is moving to the Highland Bridge development (the former Ford plant) and soccer games can be played on the football stadium as is done at many other post-secondary institutions such as nearby Macalester College. St. Thomas has the available land to solve the parking shortage it plans to create, rather than to thrust it onto the neighborhood and inspire more restrictive permit parking zones.</p>	
<p>Cars conflicting with trucks. The food, beverage, trash, and other trucks that service the arena would not be arriving or departing at the same time as spectator vehicles.</p> <p>Cars conflicting with buses. Visiting team buses would arrive earlier than spectators and would not conflict. Spectator buses could enter through the Grand Entrance, but would not enter the Anderson Parking Ramp and would be diverted around the arena to the south side.</p> <p>Cars conflicting with pedestrians. If the EAW is correct, students residing on campus will walk to the arena, crossing Cretin Avenue at the same time that arena traffic is at its highest before and after games. The EAW discusses extended signals for arena-bound traffic and traffic officers to halt traffic, but arena traffic will run north-south at the same that students will need to travel east-west across Cretin. This inherent and dangerous conflict could be</p>	<p>A tunnel under Cretin Ave is not a feasible improvement due to the existing infrastructure beneath Summit Ave.</p> <p>As mentioned on Page 9 of the Transportation Study, "In urban areas, it is common for intersections to operate at LOS E or LOS F for short periods of time, particularly when balancing other transportation modal priorities." and "It is typical of intersections with higher mainline traffic volumes to experience high levels of delay (poor levels of service) on the side-street approaches, but an acceptable overall intersection level of service during peak hour conditions."</p>

Comment	Response
<p>solved by a pedestrian tunnel underneath Cretin Avenue, but has no other obvious solution if an arena is built.</p> <p>Cars conflicting with cars. The EAW's solution to pre-game and post-game traffic issues is to have non-arena traffic stop so that arena traffic may swiftly flow onto Cretin and Grand Avenues. This would be accomplished by altering the signal patterns, such as adding a dedicated left-turn light to northbound Cretin and keeping the light green for traffic leaving the Anderson Parking Ramp; this could be done at Grand Avenue and Summit Avenue to allow cars to leave the South Campus unhindered. The result would be that non-arena traffic on Summit, Grand, and Cretin would be halted or slowed for a period of 20-30 minutes before and after each game. The EAW admits that the level of service (LOS) at nearby intersections will be F (the lowest rating), and that F is an unacceptable LOS. Specifically, the EAW's traffic study that the LOS will go from its current A to an F at Cretin and Goodrich, from B to F at Cretin and Grand, and from A to D at Cretin and Summit.</p> <p>Cars conflicting with bicycles. The EAW mentions bicycle options several times. Because basketball and hockey are winter sports, the EAW is misguided in relying on any spectators arriving by bicycle. The site plan does not include any bicycle parking.</p> <p>Public Transportation: The EAW identifies three public transit options for the arena (Routes 21, 63, and 87). The only consistent service to the University of St. Thomas in 2024 will be Route 63 on Grand Avenue. Route 87 on Cleveland Avenue has service only once per hour on weekends, and Route 21 will no longer run from Lake Street to the St. Thomas campus after it is replaced by the B Line rapid transit service. Consistent public transit will only be possible from the east down Grand Avenue but buses will not be able to travel as scheduled because traffic will be halted for cars driving to or from the arena.</p> <p>No Available Alternative: Unlike the access and parking issues discussed above, there is no reasonable way that thousands of vehicles can travel to and from the arena without creating significant conflicts with existing traffic patterns. If this were a once-a-year phenomenon such as graduation, the occasional conflict could be acceptable. St. Thomas proposes to hold numerous events each week, and St. Thomas acknowledges that the results will produce an unacceptable level of service on the surrounding streets. St. Thomas has not committed to implement any mitigation strategy, and the few that are discussed in</p>	<p>The intersections with operational issues on the side-street approaches (but not overall) is discussed on Page 40 of the Transportation Study, "During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 15 to 30 minutes. These approaches mostly consist of low-volume residential traffic. As mentioned previously, communication should be made to area residents and other sources of commuter traffic, so they are aware of potential event traffic and the most efficient route to get to/from their destination."</p> <p>Bicycle parking has not been located at this time in the project design; however, it is intended to be included in the project.</p>

Comment	Response
the EAW (e.g., bicycle ridership in winter, city bus service) would not have a significant impact.	

Marc Manderscheid

Comment	Response
6 – Project Description	
<p>The City’s EAW Fails to Properly Define the “Project” and Even Consider “Cumulative Impact” and the “Cumulative Potential Effects” of Ongoing and Proposed Development on the University’s South Campus</p> <p>The June 2023 St. Thomas EAW prepared on behalf of the City of Saint Paul violates Minnesota law by improperly defining the proposed “project” and in failing to properly consider the “cumulative potential effects” of the connected actions and phased actions which are a part of the University’s redevelopment of its South Campus.</p> <p>The purpose of an Environmental Assessment Worksheet (“EAW”) is to provide the information needed to properly assess the environmental impact of a proposed project, and to determine whether a more detailed Environmental Impact Statement (“EIS”) is required under Minnesota law. Minn. R. 4410.1000, subp. 1. Because the City’s EAW improperly and incorrectly defines the “Project,” the full information necessary to conduct a proper environmental review is necessarily missing, and the EAW fails in its essential purpose to provide accurate and relevant information concerning how the South Campus redevelopment clearly has the potential for significant environmental effects.</p> <p>Background information concerning the recent ongoing development of the University’s South Campus and the new South Campus Quadrangle</p>	<p>As noted in guidance from the Environmental Quality Board (EQB) for completing environmental reviews, the RGU must determine what components the project includes for the purposes of the environmental review. “Connected actions,” are actions by any proposer that are closely connected to the initial project. “Phased actions,” are future actions by the same proposer. For purposes of assessing whether a mandatory EAW or EIS threshold is reached, there is a 3-year look-back, which is an extension of the phased action concept into the recent past.</p> <p><u>Connected Actions:</u> The Schoenecker Center and Arena projects are not considered connected actions as one was not induced by the other, one was not a prerequisite for the other, and both projects can be justified by themselves, as explained by the MN Rules 4410.0200, subp. 9c, the types of relationships that could be considered connected actions. The Schoenecker Center was constructed to meet a space deficit for academic programs across the University’s campus. The Arena is intended to meet the demand of Division I athletics and</p>

Comment	Response
<p>In 1987, the University purchased approximately 23 acres of land and multiple older buildings from the St. Paul Seminary, which area is presently referred to as the South Campus. The University's initial new construction in the South Campus was to the southwest of the Cretin and Summit Avenues intersection, when it built the Frey Science and Engineering Center, consisting of Owens Hall and O'Shaughnessy Hall. The second major new construction was of a parking ramp to replace parking spaces lost because the University constructed new buildings across the Summit and Cretin Avenue intersection on the North Campus.</p> <p>In February 2009, St. Thomas opened the Anderson Parking Facility, a five level, 724-space parking ramp, on the southwest corner of Cretin and Grand Avenue South. The ramp replaces parking spaces that will be lost in Lot H (402 spaces) to make way for the proposed Anderson Student Center and in Lot E (71 spaces) that were lost because of the construction of the Anderson Athletic and Recreation Complex.</p> <p>See December 2009 EAW for Anderson Student Center and Anderson Athletic and Recreation Complex, p. 4; see pp. 21-22.</p> <p>When the Anderson Parking Facility was built, the City's parking regulations required that parking for an athletic stadium must be located within 600 feet of the sports facility. The Anderson Parking Facility was located more than the required distance away from O'Shaughnessy Stadium, thus causing the University in April 2010 to request a modification of its Special Condition Use Permit, so that it could avoid being required to comply with the City's parking regulations. St. Thomas subsequently amended its development plans to include a total of 118 underground parking spaces in the Anderson Student Center.</p> <p>The point of mentioning the above history is to make clear that the Anderson Parking Facility on the South Campus was never intended solely to supply parking spaces to the South Campus, but it was primarily constructed to serve as the principal parking facility for the buildings and facilities on the southwest corner of the North Campus, including the new Anderson Student Center. The Anderson Parking Facility has also been used to provide parking for events on the top floor of the Anderson Student Center, which has a large meeting and conference space with table seating for up to 794 persons and 860 seats auditorium style. This space is often rented to outside groups for meetings, conferences,</p>	<p>lack of suitable athletic venues. Both stand alone in their uses for the University.</p> <p><u>Phased Actions:</u> The Phased Actions relationship looks at future actions by the same proposer. There are not any known future stages of development beyond the Arena project that meet the criteria of the MN Rules 4410.0200, subp. 60. The Schoenecker Center building has received all permits and approvals and is currently under construction, expecting to be completed in January 2024. As noted in the EAW, The University of St. Thomas does not have any board approved plans for new building construction at the Saint Paul campus. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any future building projects to contribute to the understanding of cumulative potential effects. If a future project within the University of St. Thomas exceeds an EAW or EIS threshold as noted in MN Rules 4410, the appropriate environmental review will be completed. Also, if a project starts within the geographic area within the next three years, that project may be subject to the 3-year, look-back period that would include impacts from other projects that have not completed an EAW or EIS.</p> <p>As noted in the EAW, the Anderson Parking Facility is an existing parking ramp that was designed for future expansion of two additional floors. The expansion is discussed as a potential improvement in the Traffic Impact Analysis however, it is not currently planned or funded at this time. As previously noted, the expansion of the Anderson Parking Facility would require a review through</p>

Comment	Response
<p>and social events held on Friday and Saturday evenings. Persons attending these events are directed by the University to park in the Anderson Parking Facility on the South Campus.</p> <p>As far back as 2010, only one year after the Anderson Parking Facility opened, there was ongoing discussion between St. Thomas, the City, and the community about the desirability of adding an additional two floors to the Anderson Parking Facility, in order to meet the substantially increased parking demand caused by all of the new construction on the North Campus.</p> <p>In 2015, the University constructed the multi-level Facilities and Design Center adjacent to the Anderson Parking Facility, facing the Grand Avenue extension.</p> <p>In November 2016, the University's Board of Trustees unanimously approved a new 10-year Campus Master Plan, which it developed with the campus planning firm of Hastings + Chivetta. The Master Plan stated that future projects for the South Campus were to include a new 137,000 square foot science and engineering building on the north side of the Grand Avenue extension and adding two more levels on the top of the Anderson Parking Facility, which would require a height modification in the 1990 Special Condition Use Permit, which allows only a 60-foot building in that location. See November 2016 Campus Master Plan and Press Release describing the Plan.</p> <p>In June, 2019, the University submitted to the City of St. Paul a "Site Plan Review Application" for a project which was described as "New Permanent Parking Lot West of Loras Hall." The application identified the Project architect as "Kimley-Horn" and the contractor as "Ryan Companies U.S., Inc." This project a "New permanent parking lot west of Loras Hall and second, alley repaving and garage removals along the west block alley." On the South Campus, the plan was to build a new 58-stall code-compliant parking lot, in the location now occupied by the Schoenecker Center, for a net parking gain of 38 parking spaces. This project was to start construction in August, 2019, but was withdrawn shortly after the permit materials were submitted to the City.</p> <p>The hasty withdrawing by the University of its proposal to increase surface parking spaces on the South Campus is explained by the University's announcement just a few months later that it would be constructing the Schoenecker Center, which would combine instruction in science, technology, engineering, arts, and math into one large new building. The</p>	<p>the City process and would require an amendment to the CUP.</p> <p><u>3-Year, Look-Back Rule:</u> Based on the "3-year look-back rule" concept, the Schoenecker Center building could be considered a "phased action" with the Arena project, as the Schoenecker Center project submitted its first application in October 2021, which is within the 3-year window of the arena project EAW completed in June 2023, and was not reviewed through an EAW or EIS. However, any impacts and mitigation needed for the Schoenecker Center project has previously been identified and addressed through the permitting and approval process.</p> <p>The rules require that preparation of the EAW and consideration of the need for an EIS consider phased actions and connected actions. To that end, impacts associated with the Schoenecker Center project were included as part of the existing conditions analysis and background conditions for the EAW and Traffic study analysis.</p> <p>The Schoenecker Center construction (with an anticipated completion date of Jan 2024) is shown in Figure 3 and on an inset on Page 16 of the Transportation Study. There is a multi-use component to college campuses in which students, faculty, staff, and visitors often park once and visit multiple locations on campus. The <i>ITE Parking Generation Manual, 5th Edition</i>, which is a parking industry standard, only generates parking demand on college campuses based on enrollment. Therefore, a building addition on a college campus is not a good indicator for changes in parking demand. Based on UST</p>

Comment	Response
<p>Schoenecker Center, presently under construction, consists of a five level, 130,000 square foot structure connected by skyway to the existing Frey Engineering and Science complex. In addition to constructing the new building, the Schoenecker Center development includes replacing multiple surface parking lots on the north side of the Grand A venue extension with a new "South Campus Quadrangle." This Quadrangle would replicate on the South Campus some of the same green space, landscaping and sidewalks now present on the several quads located on the North Campus. In order to construct the new Schoenecker Center and Quad, the University last year eliminated approximately 127 surface parking spaces. There is no parking in the new Schoenecker Center and the University has not replaced any of the 127 recently removed parking spaces.</p> <p>The City's EAW fails to comply with the Mandatory Standards for EAW Preparation</p> <p>Correctly identifying and defining the "project" in an EAW is critical to gathering all of the necessary information for analyzing the possible detrimental effects and potential environmental impacts. Among the defined terms in the EAW regulations is a "Phased Action" which "means two or more projects to be undertaken by the same proposer that... will have environmental effects on the same geographic area; and are substantially certain to be undertaken sequentially over a limited period of time." Minnesota Rules, Part 4410.0200, Subp. 60. A similar concept is set forth in the definition for "Connected Actions." Id. at Subp. 9(c).</p> <p>Minn. Rule 4410.1000, Subp. 4, provides: "Connected actions and phased actions. Multiple projects and multiple stages of a single project that are connected actions or phased actions must be considered in total when determining the need for an EAW, preparing the EAW, and determining the need for an EIS." The June 2023 EA W fails this mandatory standard.</p> <p>One of the most important reasons for correctly defining a project in the first instance is to identify the "cumulative impact" and "cumulative potential effects" of activities where not all of the construction is done pursuant to the same construction contract.</p> <p>"Cumulative impact" means the impact on the environment that results from incremental effects of the project in addition to other past, present, and reasonably foreseeable future projects regardless of what person undertakes the other projects. Cumulative impacts can</p>	<p>discussions, student enrollment, staff, and faculty projections are expected to remain relatively consistent through the analysis period, therefore, no additional parking estimates were assumed. The Schoenecker Center project was constructed to accommodate a space deficit for existing academic needs.</p> <p>One of main considerations related to connected and phased actions is whether a mandatory EAW or EIS threshold has been met. Because UST is not improperly dividing a larger project into smaller pieces to evade environmental review, and because the Schoenecker Center is taken into account in the EAW and is subject to enforceable mitigation measures, the EAW complies with all requirements.</p>

Comment	Response
<p>result individually minor but collectively significant projects taking place over a period of time.</p> <p>"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... Significant cumulative potential effects can result from individually minor projects taking place over a period of time. In analyzing the contributions of past projects to cumulative potential effects, it is sufficient to consider the current aggregate effects of past actions.</p> <p>See Minn. R. 4410.0200, subp. 11 and 1 la.</p> <p>The above defined terms from the EAW regulations identify the critical nature of properly defining the "project" in the first instance. Here, the City's EAW, prepared by St. Thomas's retained design professionals, fails to properly identify the project, and "other projects" in the environmentally relevant area, thus both misstating and understating the environmental effects which will arise because of the University's concentrated new construction in and around its new South Campus Quadrangle.</p> <p>The EAW's response to question 6, the "Project Description" is inaccurate and incomplete</p> <p>The EAW's answers to Item 6 of the EA W Form are inaccurate, incomplete, and misleading. Item 6.b. requires "a complete description of the proposed project and related new construction, including infrastructure needs." Because the EAW fails to fully describe all of the redevelopment which has already taken place around the South Campus Quadrangle area, it fails to identify the physical changes that have already occurred and are continuing to occur in the area immediately adjacent to the proposed new arena. Subsection d. to Item 6 requires an answer to the question "Are future stages of this development, including development on any other property, planned or likely to happen?" The EAW references only the Anderson Parking Facility, and fails to include the Schoenecker Center and South Campus Quadrangle.</p> <p>In response to Question 6.b., the EAW asks the reader to see "Figure 3" for existing site conditions. A quick glance at Figure 3 shows the immediate adjacency to the new arena of the ongoing construction of the Schoenecker Center and the construction yet to begin to</p>	

Comment	Response
<p>create the South Campus Quadrangle. Look at the recent aerial photographs! See EAW Figures 3, 8, and 9. There is obviously additional construction presently going on today immediately adjacent to the location of the new arena. The new South Campus Quadrangle, which will be expanded from what is depicted on the "Existing Conditions Plan- 05.10.2023" will cover land adjacent to both the Schoenecker Center and the new arena, eliminating the Grand A venue extension, and expanding the size of the Quadrangle to include land on both sides of the former driveway.</p> <p>Perhaps the EAW's failure to define the "project" as including the Schoenecker Center building and the adjacent the South Campus Quadrangle is because the contractor for the Schoenecker Center is McGough Construction Co., LLC, while the "Proposer" and contractor for the Anderson Arena is Ryan Companies. It makes no difference in EAW preparation if two different contractors are building on adjacent property having the same owner. There is only one University of St. Thomas.</p> <p>The University has often lauded the interconnected nature of its South Campus redevelopment. At the June 5, 2023 UST/Community meeting hosted by UST President Vischer, it was explained by a UST speaker that "the Arena completes the fourth side of the South Quadrangle." On July 24, 2023, UST issued a press released entitled: "Schoenecker Center Transforms South Campus."</p> <p>The EAW rules require that all of the related physical changes to the immediate physical environment be taken into account when preparing an EAW. The June 2023 EAW fails to do so. The failure to include and describe all of the phased and connected construction in the June 2023 EAW report violates the Minnesota Environmental Policy Act and renders the conclusions in the June 2023 EAW incomplete, inaccurate, and unreliable. See <i>Pope County Mothers v. Minn. Pollution Control Agency</i>, 594 N.W.2d 233,237 (Minn. Ct. App., 1999), where the Court held the MPCA did not "engage in reasoned decision making when it failed to consider the cumulative environmental effects" of "multiple individual sites."</p> <p>Item 6.e. of the EAW questionnaire asks: "Are future stages of this development, including development on any other property, planned or likely to happen?" If yes, then the EAW regulations require a description of future stages, relationship to the present project, timeline, and plans for environmental review." <i>Id.</i> The EAW appropriately answers the first question "yes." The only other project listed in the EAW, however, is: "The Anderson</p>	

Comment	Response
<p>Parking Facility is an existing parking ramp that was designed for future expansion of two additional floors. The expansion is discussed as a potential improvement in the Traffic Impact Analysis (Appendix D.); however, it is not currently planned or funded at this time.”</p> <p>So what? The University has been discussing the addition of two additional floors to the Anderson Parking Facility since 2010; it was specifically included as an upcoming project in the 2016 Campus Master Plan approved by the University Board of Trustees. The question asked in preparing an EAW is not whether "construction plans" have been drawn or capital funding has been raised. The question asked in an EAW, is whether there are future stages of the development which are "likely to happen?" With new construction of one-half million square feet of new buildings already underway or planned, all within the same geographic area, the two additional stories on the Anderson Parking Facility are indeed "likely to happen." Whether the University considers a project as not being "real" until its full funding has been authorized by the Board of Trustees, is a completely separate question from whether the environmental impact of new development "likely to happen" must be included within an EAW analysis of potentially harmful environmental effects likely to occur within a limited land area.</p>	
<p>21 – Cumulative Potential Effects</p>	
<p>Item 21, “Cumulative Potential Effects” fails to properly quote the rule, fails to analyze the issue, and fails to meaningfully analyze the Cumulative Potential Effects of the construction bordering the University’s South Campus Quadrangle</p> <p>The language in the first sentence of the definition for "Cumulative potential effects" requires an analysis of "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..." Minn. Rule 4410.0200, Subp. 11a. Thus, it is only logical that "other projects" include past, present, and future projects, and that all of the projects together must be analyzed and understood to properly identify all cumulative potential effects. This interpretation of the first sentence is further supported by the final clause of the next sentence, which requires that the EAW analysis also "includ[e] future projects actually planned or for which a basis of expectation</p>	<p>The Schoenecker Center building has received all permits and approvals and is currently under construction. Any impacts and mitigation needed for this project have previously been identified and addressed through the permitting and approval process. This project was included as part of the existing conditions analysis and background conditions for the EAW and Traffic study analysis.</p> <p>As previously noted, the expansion of the Anderson Parking Facility would require a review through the City process and would require an amendment to the CUP.</p>

Comment	Response
<p>has been laid... " The word "including" in the Rule makes clear that not only are past and present projects to be analyzed, but also "future projects." "Future projects" does not limit the cumulative effects analysis to cover only future projects, as the City's EAW suggests in the response to Items 6 and 21.</p> <p>The text in the June 2023 EAW omits any reference to the next sentence in the regulatory definition of Cumulative Potential Effects, which states: "Significant cumulative potential effects can result from individually minor projects taking place over a period of time." Minn. Rule 4410.0200, subp. 1 la. The rules require that adjacent changes in land use must be included in considering cumulative potential effects. The next sentence further supports a broad interpretation of the types of construction projects to be included in a proper analysis: "In analyzing the contributions of past projects to cumulative potential effects, it is sufficient to consider the current aggregate effects of past actions." Id. Thus, the full text of Rule 4410.0200, subpart 11.a. makes it absolutely imperative that a proper analysis of cumulative potential effects must include all past, present, and future actions. The June 2023 EAW's failure to even identify, yet alone analyze the effects of all of the past and present projects, i.e., the Schoenecker Center construction, the plan for the South Campus Quadrangle, and the planned expansion of the Anderson Parking Facility, must be taken into account now in the EAW analysis.</p> <p>Subparagraph b. of Item 21 asserts that "The University of St. Thomas does not have any board approved plans for new building construction at the St. Paul Campus." This is erroneous. The University has "plans." In November 2016, the St. Thomas Board of Trustees unanimously approved a "10-year St. Paul Campus Master Plan." On the South Campus, Item 11 of the Master Plan specifically calls for a "New Academic Building [for] Science & Engineering [with a size of] 137,000 SF." Item 13 of the Plan clearly states: "Expand Anderson Parking Facility (two levels) 300 parking spaces."</p> <p>The new science and engineering building called for in the 2016 Master Plan is presently under construction. The plan to expand the Anderson Parking Facility, by adding two levels on top of the existing ramp, can be accurately analyzed now because the location, dimensions, and floor plan for the new construction will be the same as it is on the level existing below the proposed two new levels. It is simply wrong to suggest, as is done in the</p>	<p>Cumulative potential effects need only be analyzed for future projects if such projects are planned or for which a basis of expectation has been laid. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any future building projects to contribute to the understanding of cumulative potential effects. If a future project within the University of St. Thomas exceeds an EAW or EIS threshold as noted in MN Rules 4410, the appropriate environmental review will be completed.</p>

Comment	Response
<p>EAW, that "there is not sufficiently detailed information about any future building projects to contribute to the understanding of cumulative potential effects."</p>	
<p>21- Cumulative Effects</p>	
<p>The City of St. Paul must reject the June 2023 EAW for its failure to meet the requirements of the Minnesota Environmental Policy Act and the applicable rules</p> <p>An outline of a City's responsibility to appropriately consider "potential impacts" and "cumulative potential effects" is set forth in the recent case of In Re City of Cohasset's Decision on the Need for an Environmental Impact Statement for the Proposed Frontier Project, 985 N.W. 2d 370 (Minn. Ct. App. 2023). As the Appeals Court noted, and the law and rules make clear, an environmental impact statement is required "if the proposed project has the potential for significant environmental effects." 985 N.W. 2d at 378. The Appeals Court reversed the city's decision and remanded for the city to issue a new decision on the need for an EIS, after concluding that the City's decision not to require a proper environmental analysis was "unsupported by substantial evidence." Id. Here, if the City of St. Paul does not require the preparation of a proper EAW with full and accurate information, or order the preparation of an Environmental Impact Statement, the City will simply cause delay and uncertainty to the University's timetable. See Pope County Mothers, 594 N.W.2d at 238.</p>	<p>State administrative rules also include standards and criteria for the decision on the need for an Environmental Impact Statement (EIS), based on the potential for significant environmental effects. State rules defines environment as land, air, water, minerals, flora, fauna, ambient noise, energy resources, and artifacts or natural features of historic, geologic, or aesthetic significance.</p> <p>Through the EAW process environmental impacts have been identified and mitigation measures have been outlined in the document. No significant impacts that cannot be mitigated through the appropriate permits and approvals process have been identified.</p>
<p>20 – Transportation</p>	
<p>The Transportation Study by SRF fails to account for numerous issues with existing insufficient parking and fails to appropriately analyze future parking problems. The Transportation Study needs to be redone with the correct base data, in order to develop a real-world view of the parking shortage and the resulting transportation congestion likely to arise because of the University's proposed new construction.</p> <p>Just as the body of the EAW report fails to identify the "cumulative impact" and the "cumulative potential effects" of the development already occurring on the University's South Campus, the parking study is similarly flawed. For instance, the parking study fails even to discuss the new Schoenecker Center, which is presently under construction and will</p>	<p>The Schoenecker Center construction (with an anticipated completion date of January) is shown in Figure 3 and on an inset-on Page 16 of the Transportation Study. There is a multi-use component to college campus in which students, faculty, staff, and visitors often park once and visit multiple locations on campus. The ITE Parking Generation Manual, 5th Edition, which is a parking industry standard, only generates parking demand on college campuses based on enrollment. Therefore, a</p>

Comment	Response
<p>open in 2024. The 130,000 square foot Schoenecker Center will create greater parking demand by bringing additional students, faculty, staff, visitors, and programs to the South Campus Quadrangle. Those persons are going to need to park somewhere.</p> <p>The site of the Schoenecker Center used to provide 127 parking spaces for use by South Campus visitors. The construction of the Schoenecker Center eliminated those spaces, as well as creating increased evening demand, such as will arise from the music auditorium in the new building. Similarly, the parking demand analysis fails to account for the hundreds of persons attending programs, events, and dinners on the third floor of the Anderson Student Center. I have often driven down Cretin A venue on weekend evenings and seen many persons dressed in suits and fine dresses walking along Cretin from the Anderson Parking Facility to the Anderson Student Center. None of the first two events were even taken into account in the parking demand analysis by SRF; all three occurring simultaneously was never considered. It is easy to imagine that on a Friday night there will be a basketball game in the new arena, a music concert in the Schoenecker center, and a non-profit fundraising event on the third floor of the Student Center. Where are all these people going to park?</p> <p>On page 16, the parking analysis identifies that the construction of the arena alone "is expected to result in the net loss of approximately 265 parking spaces." But, this statement fails to account for the 127 recently eliminated spaces lost because of the construction of the Schoenecker Center and the north portion of the new South Campus Quadrangle . Thus, the total parking loss from the current and proposed construction is at least 392 spaces, almost one-half again more than the 265 that was analyzed in the parking study.</p> <p>Table 12, "Available Parking Supply Before Events" suggests that on Friday and Saturday nights there will be between 185 and 214 parking spaces available on nearby public streets for persons attending events in the new arena. Figure 9 identifies a potential number of street parking spaces. My experience from living nearly adjacent to the University's campus for over 25 years is that there are seldom significant numbers of parking spaces available on weekends along Summit and Grand A venues when school is in session; students and their weekend guests make substantial use of the free parking available on those public streets and it can be difficult to even find any significant number of on-street parking spaces.</p> <p>The University's basketball and hockey games will be played in the late fall throughout the winter. During this same time period, it often snows in St. Paul. Sometimes the City declares</p>	<p>building addition on a college campus is not a good indicator for changes in parking demand. Based on UST discussions, student enrollment, staff, and faculty projections are expected to remain relatively consistent through the analysis period, therefore, no additional parking estimates were assumed. The Schoenecker Center project was constructed to address space deficits for existing academic programs.</p> <p>As discussed on page 11 of the Transportation Study, UST collected parking utilization counts on four (4) weeknights, and the average of those counts were utilized to represent an average or typical weeknight condition. In addition, parking counts were collected by SRF from Thursday, March 30, 2023 to Saturday, April 1, 2023.</p> <p>While there will always be daily variations in parking demand, the analysis was meant to be based on typical or average parking conditions at and around campus.</p> <p>As discussed on Page 21 of the Transportation Study, a maximum capacity (sold-out) basketball game on a weeknight was the focus of the transportation study analysis as it represents the "worst-case from an attendance, parking, and traffic perspective."</p> <p>As discussed on Page 11 of the Transportation Study, the parking utilization counts were collected in Spring of 2023, when on-going Schoenecker Center construction was occurring, and the 127-space lot was already eliminated. Therefore, the "base" parking count data already accounted for this loss in parking.</p> <p>Comment noted regarding snow. Snow events and/or emergencies would significantly impact the number of on-</p>

Comment	Response
<p>snow emergencies. When the City declares snow emergencies, there will be no neighborhood parking available anywhere near the University. Moreover, as was the case this past winter, the City's difficulty in clearing snow from curb to curb significantly restricts the number of on street parking spaces which are available. The parking study fails to account for snow in St. Paul during the winter sports' seasons.</p> <p>Figure 9, "Event Parking Supply," notes those residential blocks near the University in which the City Residential Permit Parking program is in place. The Study's Event Parking Demand analysis specifically notes, in footnote 3 that "nearby city permit parking restrictions are generally not in effect on Saturday," and thus assumes that all of the neighborhood streets will be available on weekends for arena parking. At the public forums which the University has hosted this year, UST's southern residential neighbors have made very clear their intentions to petition the City to extend the residential permit parking restrictions to include Saturdays and to extend the evening parking restrictions to 10:00 p.m. The University is very well aware of the neighborhood attitude on this issue. As a matter of fairness and equity, it is entirely inappropriate for the University to fail to spend the money necessary to construct parking facilities on its own campus, and thereby shift the burden of automobile storage to the surrounding neighborhoods, when the reason the demand exists is for persons attending University events.</p> <p>The "Key takeaways from the event parking demand" suggest that for maximum basketball events there is expected to be "a deficit of approximately 330 to 740 spaces. These vehicles will likely utilize public parking in the neighborhood." See Page 28. The next paragraph provides: "Maximum hockey events are generally expected to be accommodated on campus. However, some vehicles may choose to park on public streets on the neighborhoods over parking in the Northeast Quadrant of the North Campus, especially on Saturdays when city permit parking restrictions are lifted." See p. 28. This acknowledgment illustrates one of the major elements of, blindness in the Parking Study. When the University makes its campus parking spaces available, it charges a fee for parking. Parking on neighborhood streets is "free." A fact of life is that most persons driving to events in the University's new arena would prefer free parking over pay parking. The Study fails even to discuss how this issue will impact parking demand and congestion in the neighborhood.</p>	<p>street parking available. Much like Saint Paul residents need to react to snow emergencies and plan for parking differently than their normal practices, the University would need to accommodate additional parking during those unique periods as well.</p> <p>Page 29 of the Transportation Study notes the assumption "Prepaid entry to the APF parking facility. Parking tickets are either expected to be checked by a parking consultant or inserted into a machine upon entry." as parking costs are expected to be increased at the APF due to its proximity to the arena.</p> <p>The parking demand analysis was primarily focused on the total available parking supply vs. the expected event parking demand. Visitor parking structures operate a self-paid service that costs \$1.50/hour after 4 pm. For basketball/hockey events, the cost to park in these visitor structures would be less than \$4. This cost may not be significant enough to deter users from parking closer to the arena (depending on the lot) during the winter and avoiding circling neighborhoods and/or parallel parking. Many event attendees will be students and/or season ticket holders who are attending multiple events each season. The University will need to continue to stress parking in the available lots on campus and the recurring attendees will develop habits for where to park when attending each event.</p> <p>Based on similar program attendances, the larger parking deficits (i.e., 330 to 740 vehicles) are expected to occur once or twice a year.</p> <p>The base assumptions as part of the Transportation Study were discussed and confirmed by the University of St.</p>

Comment	Response
<p>In the real world, patrons coming to the University to attend athletic events will likely be cruising the neighborhood looking for free parking spaces (even if signs restrict it, there will undoubtedly be persons parking in violation of the permit restrictions). There are substantial numbers of neighborhood residents who pay for their resident parking permits for their families and guests, such that there are often very limited open parking spaces available now on the neighborhood streets. The Parking Study fails to account for how the actions of drivers seeking "free" parking will increase congestion, delay traffic clearing, potentially create safety issues, and have negative and deleterious effects on the quality of life for the neighbors residing south of the University.</p> <p>Again, the EAW identifies that during some events there "are expected to [be] a deficit of approximately 330 to 740 vehicles which will likely use public parking in the neighborhood." EAW, p. 36. Even this number is likely low as it is based on unrealistic assumptions (such as assuming patrons will be willing to pay to park in Tommie North, so that they can walk back across the entire campus late on winter evenings!). Because so many of the base assumptions used forecasting supply for and proposed mitigation are either unrealistic or unlikely to happen, the Transportation Study fails to provide sufficiently accurate information such that the true impact of the proposed arena is accurately set forth.</p> <p>The EAW and SRF's Transportation Analysis fail to explain how shunting hundreds of cars into the nearby residential neighborhoods can possibly satisfy Policy LU-54 of the City's 2040 Comprehensive Plan, which seeks to:</p> <p>Ensure institutional campuses are compatible with their surrounding neighborhoods by managing parking demand and supply, ... minimizing traffic congestion, and providing for safe pedestrian and bicycle access.</p> <p>The word "ensure" is often defined as "to secure or guarantee" and "to make sure or certain." There is nothing "certain" about simply listing "possibilities" for mitigation, when the University has not indicated its willingness to implement mitigation activities.</p> <p>When an RGU considers mitigation measures as offsetting the potential for significant environmental effects under Minn. R. 4410.1700, it may reasonably do so only if those measures are specific, targeted, and are certain to be able to mitigate the environmental effects." 713 N.W.2d at 835. The EAW fails this test. The traffic study's purported mitigation</p>	<p>Thomas and the City of Saint Paul. The Tommie North lot is within a 1/2-mile radius of the Arena, which is generally considered walking distance for event patrons. Given permit parking restrictions, this walking distance wouldn't be substantially different to parking in the public parking in the neighborhoods.</p> <p>Several potential mitigation strategies and improvements were identified to help reduce public parking in the neighborhoods and are discussed on Pages 34-36 of the Transportation Study. For more information, see the list of mitigation in the section titled Mitigation Plan.</p> <p>The Transportation Study was a thorough and comprehensive study with numerous data collection efforts at most, if not all, primary intersections and parking locations surrounding the University of St. Thomas Saint Paul Campus. The various data collection efforts completed as part of the study established a new "base" condition for campus, which took into account all traffic and parking changes and impacts from prior construction and/or campus modifications.</p>

Comment	Response
<p>analysis is disjointed and fails to establish how or even if the possible ideas for mitigation will actually solve the parking and congestion problems likely to occur.</p> <p>The Minnesota courts have concluded that an RGU may not rest its decision "on 'mitigation' that amounts to only 'vague statements of good intentions.'" Citizens Advocating Responsible Development vs. Kandiyohi Board of Commissioners, 713 N.W. 2d 817, 822 (Minn. 2006). An RGU is simply not allowed to push off to the future the possible mitigation of environmental harm. "Under MEPA, an RGU must determine whether a given project has the potential for significant environmental effects before approving the project." Id. at 835.</p>	
<p>Parking Conclusion</p>	
<p>In summary, what the University has done or is proposing with regard to parking on the South Campus is the following:</p> <ul style="list-style-type: none"> •Eliminate 392 parking spaces. •Add one-half million square feet of new building with a 5,000 seat arena and new academic spaces. •“No onsite parking is expected to be constructed in the redevelopment.” <p>When reduced to its stark essentials, this “conclusion” makes no sense.</p>	<p>Thank you for your comment.</p>
<p>The City of St. Paul should reject the current EAW and require more and better study</p>	
<p>The City must reject the current EAW and at least require that a full and accurate EAW be prepared, which properly defines the project; identifies all of the negative potential environmental effects; and complies with Minnesota law. Or, the City could direct that an Environmental Impact Statement be prepared.</p> <p>Kimley Horn and SRF have put the City of St. Paul into a difficult position. No doubt, the University of St. Thomas would like to be done with the environmental review as soon as possible. But, the Minnesota Environmental Policy Act and the Rules thereunder must be followed. As set forth above, the June 2023 EAW fails to properly define the project; fails to appropriately consider connected actions and phased actions; improperly minimizes the</p>	<p>Comment noted.</p>

Comment	Response
<p>cumulative potential effects of all elements for the University's South Campus Quadrangle and related construction. The parking and congestion analyses omit necessary information, and strongly suggest that the University's acknowledged parking shortage should be solved by forcing the neighborhood to bear the negative consequences of insufficient parking on campus.</p> <p>There is simply not enough accurate and complete information in the June 2023 EAW for the City to reasonably and appropriately analyze the potential environmental impacts of what the University is proposing. The standards for the City's decision on whether there is a need for an EIS is set forth in Minn. R. 4410.1700. Subpart 2.a. provides that if there is insufficient information "necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could reasonably be obtained, the RGU shall either 'require an EIS to obtain the lacking information or postpone the decision on the need for an EIS, and grant an extension to allow time in order to obtain the lacking information.'"</p> <p>An RGU's "decision will be deemed arbitrary and capricious if the agency "entirely failed to consider an important aspect of the problem, if it offered an explanation for the decision that runs counter to the evidence, or if the decision is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." Trout Unlimited, Inc. vs. Minn. Dept. of Agriculture, 528 N.W. 2d 903, 907 (Minn. App. 1995). The City should do the right thing and either require that a proper EAW be prepared, which fully analyzes all of the connected and phased actions and the cumulative potential effects of the University's South Campus redevelopment project, or direct the preparation of an Environmental Impact Statement.</p>	

Kathryn McGuire

Comment	Response
<p>6 – Project Description</p>	

Comment	Response
<p>The project proposes a seating capacity of 5,500 people but no funding or approved plan for additional parking. This is an inadequate response to the problems identified in the Traffic Impact Analysis. Provisions for parking should be established during the planning phase, not as an afterthought.</p>	<p>Thank you for your comment. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>7 – Climate Adaptation and Resilience</p>	
<p>According to the Metropolitan Council’s Extreme Heat Map, the location of the UST proposed project is “susceptible to extreme heat”. Other communities, Hopkins, MN for example, use this information to mitigate heat island effect, and this is what Saint Paul should be doing. The UST proposed development would further contribute to the Urban Heat Island Effect, which is in direct conflict with the 2040 Comprehensive Plan policy goals and detrimental to the health and wellbeing of people. Further investigation is warranted.</p>	<p>University of St. Thomas has committed to building LEED-certified facilities that can be designed to use less energy and water in order to support the City’s Climate Action and Resilience Plan. The following measures provide increased reliability and energy efficiency in the arena to reduce emissions:</p> <ul style="list-style-type: none"> • Redundant chiller design and incorporation of glycol into supply loop for all cooling coils will protect from freezing conditions and ensure systems remain operational. • Chillers will use next-generation refrigerants with low global warming potential. • The boiler system will include n+1 redundancy and freeze protection. <p>These efficiencies reduce heat emitted from the buildings and their HVAC systems and reduces indoor and outdoor exposure to heat, which is one of the impacts of the heat island effect.</p>
<p>8 – Cover Types</p>	

Comment	Response
<p>The removal of 76 mature trees from the MRCCA would have an enormous environmental impact. The carbon absorption rate of trees accelerates as the trees age, and tall, old trees are carbon storehouses for the planet. Furthermore, when forests are cut down, the stored carbon is released into the atmosphere as carbon dioxide. This is in sharp contrast to UST’s goals of carbon neutrality and the resiliency goals of the 2040 Comprehensive Plan. The EAW has not adequately assessed the environmental impact of removing 76 carbon storehouses and releasing that carbon dioxide into the atmosphere. These potential impacts warrant further investigation.</p> <p>There is additional environmental impact as trees can reduce urban heat island effects by shading building surfaces, deflecting radiation from the sun, and releasing moisture into the atmosphere. The removal of 76 mature trees from the MRCCA is in sharp contrast to the resiliency goals of the 2040 Comprehensive Plan. The EAW has not adequately assessed the environmental impact of removing shade trees that reduce the Heat Island Effect. These potential impacts warrant further investigation.</p> <p>UST proposes to plant new, young trees in other areas of the campus. It will take decades for young trees to achieve the environmental benefits of mature trees for carbon absorption and heat island reduction. Furthermore, planting 26 young trees elsewhere on campus does not mitigate the environmental impact within the MRCCA area which contains the South Campus. This proposed solution is useless as it is not within the project location.</p>	<p>Currently there are no tree preservation requirements in the City of Saint Paul at the project location. However, the University of St. Thomas has committed to replacing all trees removed onsite to at least a 1:1 ratio. The University’s stated intent is to replace the trees within or adjacent to the approximately 6-acre site for the Arena project, but since there is limited space within the Arena project area they will first replace trees elsewhere on the South Campus and then look at other areas within the remaining portions of campus for tree planting opportunities if needed.</p>
<p>10 – Land Use</p>	

Comment	Response
<p>The EAW cites the 2040 Comprehensive Plan Land Use Goal 54 which is “to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.” How can UST and the EAW conclude that the proposed plan is in anyway consistent with these goals? Traffic congestion and pedestrian safety are already problematic due to the increased traffic on Cretin Avenue, and the added traffic will compound traffic congestion profoundly. The EAW fails to address this obvious contradiction to the 2040 Comprehensive Plan. Furthermore, the UST proposal is contradictory to goals of the Saint Paul Climate Action & Resiliency Plan and other policy goals of the 2040 Comp Plan including:</p> <p>Goal #1. Economic and population growth focused around transit.</p> <p>Goal #4. Strong connections to Mississippi River, parks, and trails</p> <p>Goal #8. People centered urban design</p> <p>Policy LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.</p> <p>Policy LU-21. Identify, preserve, protect and, where possible, restore natural resources and habitat throughout the city with the following ordinances:</p> <p>Policy LU-36. Promote neighborhood- serving commercial businesses within Urban Neighborhoods that are compatible with the character and scale of the existing residential development.</p> <p>Policy LU-38. Direct the location of new secondary schools and post-secondary educational institutions along transit routes and bicycle and pedestrian networks to provide options for students and staff, and decrease traffic congestion in adjacent neighborhoods.</p> <p>Policy HP-3. Pursue funding to evaluate, maintain, renovate and preserve City-owned eligible and potentially eligible property, and assist private owners to do the same.</p> <p>Policy HP-12. Prioritize the retention of locally-designated/listed historic and cultural resources or those determined eligible for designation over demolition when evaluating</p>	<p>The <i>2040 Comprehensive Plan</i> Future Land Use map designates the project site as Civic and Institutional, which includes building and open space for major institutional campuses. Three policies apply to the Civic and Institutional land use category; however, one is specific to the Capitol Area and is not applicable to the project site. Policy LU-53 encourages partnerships with colleges and universities to strengthen connections with the community and adjacent neighborhoods, and support workforce development, business creation and innovation, and retention of youth and young professionals. Policy LU-54 aims to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution-owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.</p> <p>In Saint Paul, college and university campuses located in residentially zoned areas require a Conditional Use Permit (CUP), which defines campus boundaries and regulates building heights and setback requirements, among other things. There is an existing CUP in place for the University of St Thomas campus.</p> <p>The project will be required to comply with City ordinances and zoning as outlined in the City Code which incorporates the goals and policies identified in the 2040 Comprehensive Plan. Also, mitigation strategies identified in the EAW will help the project meet the policies mentioned above.</p>

Comment	Response
<p>projects that require or request City action, involvement or funding, or those of related development authorities.</p> <p>Policy CA-2. Protect Primary Conservation Areas through planning, land use and land alteration regulations, and other tools.</p> <p>Policy CA-3. Minimize impacts to PCAs from public and private development and land use activities.</p> <p>Policy CA-5. Manage vegetation and conduct vegetation restoration consistent with park master plans and MRCCA requirements.</p> <p>Policy CA-6. Promote the preservation and re-establishment of natural vegetation on privately-owned property.</p> <p>Policy CA-7. Consider alternative design standards related to subdivision and development of land within the MRCCA, such as conservation design or transfer of development rights, in order to protect or restore PCAs.</p> <p>Policy CA-9. Explore permanent protection measures (such as acquisition and conservation easements) to protect PCAs.</p>	
<p>The St. Paul City Council has not yet adopted the new rules of the MRCCA, nor are they required to adopt the new rules. To assume that this will be adopted is inaccurate. Furthermore, members of the City Council, Planning Commission, and DNR, are well aware of the inconsistencies and inaccuracies in the zoning assigned to the properties owned by UST and the Saint Paul Seminary. The EAW has portrayed inaccurate and incomplete information regarding the zoning of the MRCCA property, and the EAW has inaccurately portrayed the City Council's role and prerogative in this process.</p>	<p>As noted in the EAW, Saint Paul is in the process of formal adoption of new ordinance language consistent with MN Rules 6106 but has not yet completed the adoption. Per the Rules, Saint Paul's existing MRCCA ordinance, which refers to the area where the project is located as the RC3 River Corridor Urban Open (an overlay zoning district), must remain in effect until new MRCCA zoning is formally adopted by the City.</p> <p>In Saint Paul, college and university campuses located in residentially zoned areas require a Conditional Use Permit (CUP), which defines campus boundaries and regulates</p>

Comment	Response
	<p>building heights and setback requirements, among other things. There is an existing CUP in place for the University of St Thomas campus.</p>
<p>The property bordered by Cretin, Goodrich, Exeter, and Otis Avenues and the Mississippi River Boulevard, is located entirely within the MRCCA which was designated “to protect its natural, cultural, and scenic resources.” (Minnesota DNR-MRCCA). This property is designated with further protection as a Primary Conservation Area (PCA) under three categories: Bluff Impact Zone, Significant Existing Vegetative Stands, and Unstable Soils and Bedrock. These protections have been in effect since 1976, and the PCA designation is placed “to ensure that they are given priority consideration for protection.” (2040 Comprehensive Plan—MRCCA Chapter). The EAW has failed to address the intended purposes of the MRCCA and PCA protections. Further assessment is warranted.</p>	<p>As noted in the EAW, Saint Paul is in the process of formal adoption of new ordinance language consistent with MN Rules 6106 but has not yet completed the adoption. Per the Rules, Saint Paul’s existing MRCCA ordinance, which refers to the area where the project is located as the RC3 River Corridor Urban Open (an overlay zoning district), must remain in effect until new MRCCA zoning is formally adopted by the City.</p> <p>In Saint Paul, college and university campuses located in residentially zoned areas require a Conditional Use Permit (CUP), which defines campus boundaries and regulates building heights and setback requirements, among other things. There is an existing CUP in place for the University of St Thomas campus.</p>
<p>City of Saint Paul Planning Commission Resolution file number 90-14, February 9, 1990, approved the Special Conditional Use Permit (SCUP) for UST. That permit granted taller building heights within the MRCCA boundaries. The Planning Commission noted that one of the justifications for the taller building height was that it would encourage the preservation of more green space/open space on campus by encouraging buildings with smaller footprints. So, UST has extracted the provision of tall building heights while completely ignoring the underlying intent which is to preserve open space/green space by preventing construction of buildings with large footprints. UST has abused the intent of the SCUP, and the EAW has not performed a complete assessment of the Planning Commission Resolution 90-14 regarding the Special Conditional Use Permit. Further investigation is warranted.</p>	<p>The proposed Arena project is looking to utilize the existing campus area by redeveloping a portion of the campus that is already covered in mostly impervious surfaces, such as existing buildings and surface parking lots. The multipurpose function of the Arena will allow for multiple uses to occur within the building, thus reducing the need for additional buildings to be placed on campus and opening up those opportunities for additional open space.</p> <p>The project will be reviewed through the Site Plan Review process and will be required to comply with the conditions described in the current CUP.</p>

Comment	Response
<p>Planning Commission Resolution File 90-14 noted , “Before the Planning Commission may grant approval of a principal use subject to special conditions, the Commission shall find that... the use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare.” The development of a complex of this size, mass, and magnitude plus its associated traffic and noise, is detrimental to the character of the neighborhood, and it does endanger the public health, safety, and general welfare of its residents in terms of noise, traffic congestion, emissions, loss of trees, and added stress. Even the mere discussion of this proposal has caused health-threatening stress to neighborhood residents. The EAW has provided incomplete information regarding the premises of the SCUP. Further assessment is warranted.</p>	<p>As noted in the EAW, the project will require a review through the Site Plan process and other applicable permits and approvals to confirm the project is in compliance with applicable City ordinances.</p>
11 – Geology, Soils, and Topography/Landforms	
<p>The Department of Natural Resources (DNR) identified calcareous fens as a protected wetland on the property, as well as its associated rare plant species. Calcareous fens are considered to be rare, fragile, and highly protected (files.dnr.state.mn.us). Inexplicably, the EAW fails to address the calcareous fens on the property. This is incomplete information and it warrants further investigation.</p>	<p>Water resources are discussed in Section 12 of the EAW. None of the reviewed resources depicted wetlands within the project site. Calcareous fens are rare and distinctive peat-accumulating wetlands which rely on a constant supply of upwelling groundwater rich in calcium and other minerals. According to the DNR Identification List of Known Calcareous Fens⁷ and Calcareous Fens-Source Feature Points dataset⁸, there are no known calcareous fens located within Ramsey County or on the project site.</p>
12 – Water Resources	

⁷ https://files.dnr.state.mn.us/eco/wetlands/calcareous_fen_list.pdf

⁸ <https://gisdata.mn.gov/dataset/biota-nhis-calcareous-fens>

Comment	Response
<p>The EAW cites the National Hydrography Dataset mapped flow line stream 140 feet west of the project in alignment with the Grotto. It also mentions the 12 penetration test borings conducted by American Engineering Testing which revealed groundwater at depths of 6 to 12 feet. One might easily deduce that there is a sensitive flow of water within this MRCCA area and yet there is no mention of protections or possible detriments. The EAW is incomplete in this analysis of water resources. Further investigation is warranted.</p>	<p>As noted in the EAW, no impacts to the Grotto or other identified linear aquatic resources are anticipated. As noted by the American Engineering Testing analysis, a perched groundwater table has been identified on the site. The project design will account for the perched groundwater and design mitigation measures will be implemented.</p> <p>The project will meet rate control, volume control, and water quality treatment requirements as outlined in the Capitol Region Watershed District Rules. These rules are in place to ensure that stormwater is discharged from the project site at an equal or lesser rate than existing conditions and the stormwater discharge is cleaner than the existing water leaving the site.</p>
<p>14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>The EAW fails miserably with regard to identification of wildlife, plant communities, and sensitive ecological resources. Again, the DNR has identified the calcareous fens, a very rare, fragile, protected wetland, but the EAW makes no mention of it.</p>	<p>According to the DNR Identification List of Known Calcareous Fens⁹ and Calcareous Fens-Source Feature Points dataset¹⁰, there are no known calcareous fens located within Ramsey County or on the project site.</p>
<p>On this section of the MRCCA property, on several occasions, I have seen a pair of enormous barred owls perched high in the tall, mature trees. I have seen bald eagles, red-tailed hawks, and several owl species. I have also seen adult and juvenile trumpeter swans flying overhead. Each year, more than 325 species of migratory birds make their way along the Mississippi Flyway.</p>	<p>Thank you for your comment. The project site is located within the Mississippi River Twin Cities Important Bird Area (IBA)¹¹. The Mississippi River IBA includes the Mississippi River and its adjacent floodplain forest and upland areas extending for 38 river miles through 4 counties from Minneapolis to Hastings. According to the MN DNR, IBAs are a voluntary and non-regulatory part of an international</p>

⁹ https://files.dnr.state.mn.us/eco/wetlands/calcareous_fen_list.pdf

¹⁰ <https://gisdata.mn.gov/dataset/biota-nhis-calcareous-fens>

¹¹ <https://netapp.audubon.org/iba/Reports/2421>

Comment	Response
	conservation effort to bird populations ¹² . The information above was added as a correction to the EAW after receiving recommendations from the MN DNR. As indicated in Section 14.a. of the EAW, the site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation.
<p>The U.S Fish and Wildlife Service identifies the project site as a high potential zone for the Rusty Patched Bumblebee, an endangered species, but UST development has already disturbed the habitat. The EAW has failed to identify significant wildlife and sensitive ecological resources at the site. Further investigation is warranted.</p>	<p>The Arena project study area is currently approximately 4 acres of impervious surface with the remaining areas as lawn/landscaping and wooded areas. The campus is a disturbed environment as it contains lawn/landscaping and impervious surfaces in a highly urbanized area.</p> <p>The project will incorporate pollinator friendly landscaping into the project design to expand on the pollinator corridors already established on campus. This will create foraging habitat that could support pollinators such as the Rusty Patched Bumblebee.</p>
<p>15 – Historic Properties</p>	
<p>In 1984, an application was submitted for the Saint Paul Seminary property to be included in the National Register of Historic Places (NRHP). Inexplicably, that application was never submitted, and oddly enough, UST purchased the property in 1987. Since taking ownership, UST has proceeded to raze the historic buildings and change the property without reservation, to the extent that the property is too far compromised to qualify as a historic district though several buildings are still considered eligible. The EAW has not provided complete information as to why the original application was never processed and included in the NRHP. Furthermore, the Heritage Preservation Commission has determined that a review of the project is required with regard to the eligibility of three historic properties on the project site. Further investigation is warranted.</p>	<p>“Considered eligible” means that a federal agency has recommended that the property is eligible for listing in the NRHP and SHPO has accepted the recommendation for the purposes of the environmental review process. However, these properties need to be further assessed before they are officially listed in the NRHP.</p> <p>The Project proposer has initiated conversations with the Historic Preservation Commission (HPC) and the HPC will be reviewing the proposed project for compliance.</p>

¹² <https://www.dnr.state.mn.us/iba/index.html>

Comment	Response
16 - Visual	
<p>Residents of Goodrich, Fairmount, Woodlawn, Cretin, and Summit Avenues and the Mississippi River Road, the Saint Paul Seminary residents and staff, and many other neighborhood residents have appreciated the open space vistas of the MRCCA property. Since 1979, most, if not all, of these residents purchased their homes with the knowledge of the MRCCA protected property and open visual vistas it provides. Many purchased their properties when the Saint Paul Seminary was still considered eligible as a historic property. This area of Saint Paul is grossly deficient in public park space and open space, and the MRCCA area has helped to fill that deficit. It is insulting to say that “the project will not have an impact on identified significant public views” and “views from the surrounding area would be similar to those experienced currently.” Where there once was MRCCA Urban Open Space and an extended landscape of mature trees and wildlife is now the back end of the Anderson Parking Ramp. No building on any part of the campus has the footprint and mass of the proposed arena. The EAW has failed to thoroughly assess the visual impacts of this proposed arena, and it is inaccurate in its comparisons to other structures and current views. Further investigation is warranted.</p>	<p>The proposed project will not significantly change the views from identified public views in the vicinity. The Arena is situated between existing facilities and buildings on South Campus and is not significantly increasing impervious surfaces. UST has shared preliminary renderings at initial community meetings and will continue to do so as the project design advances.</p>
17 – Air	
<p>Increased traffic congestion and car idling will significantly increase the emissions of carbon monoxide, hydrocarbons, nitrogen oxides, benzene, formaldehyde, and particulates. To anyone with asthma or other health issues, this is a nightmare. We did not purchase homes near the 10 highest traffic volumes in the Twin Cities. We purchased our homes in a clean, quiet, neighborhood adjacent to the MRCCA. The EAW has grossly underestimated the harmful impact of emissions on air quality. Further investigation is warranted.</p>	<p>The EAW has addressed vehicle emissions consistent with Minnesota Environmental Quality Board guidance and in consultation with MPCA. MPCA is the regulatory body for air quality and did not provide any comments on the EAW.</p> <p>The MPCA reviews Air Quality Index (AQI) to confirm that the Twin Cities Metro Area continues to be an Attainment Area for Air Quality.</p> <p>The MPCA monitors 10 air pollutants and review the AQI to confirm the Twin Cities metropolitan area continues to be an attainment area. As part of the Clean Air Act, The US EPA calculates the AQI for five major pollutants. The data collected from the MPCA monitoring stations is compared</p>

Comment	Response
	to the EPA AQI ranges. The Twin Cities AQI on August 2, 2023 was 30, meaning the air quality in this section of Saint Paul is considered good. ¹³
18 – Greenhouse Gas (GHG) Emissions/Carbon Footprint	
<p>Many ice rink refrigerants contain potent greenhouse gases that warm the atmosphere. Common synthetic refrigerants called hydrofluorocarbons (HFCs) have a Global Warming Potential (GWP) hundreds to thousands of times stronger than that of carbon dioxide (Environmental and Energy Study Institute, February 2022). The EAW makes no mention of the harmful effects of refrigerants. This is incomplete information that warrants further investigation.</p>	<p>Emissions from ice rink refrigerants were considered as part of Item 18. The project will incorporate an ammonia (NH3)-based refrigerant plant for the ice rinks; however, annual usage will be limited for maintenance needs only and therefore not included in the GHG analysis. Ammonia is considered an acceptable non-ozone depleting alternative for ice rinks compared to other hydrochlorofluorocarbons substances under EPA’s Significant New Alternatives Policy program. Source: https://practicegreenhealth.org/sites/default/files/2019-06/PracticeGreenhealth_GHG_Toolkit_0.pdf</p>
<p>The EAW mentions that UST “may” install up to four diesel generators for back-up power and to feed the UST MicroGrid. “Diesel generators produce particulate matter (PM), volatile organic compounds (VOCs), nitrous oxide (NOx) among other harmful pollutants that create smog and exacerbate respiratory conditions.” They also produce Greenhouse Gas Emissions (GHG). (Facilities Engineering Associates, P.C., 2017) This proposal for diesel generators is in complete contradiction to UST’s carbon neutrality goals, and it is in contradiction to the Saint Paul Climate Resiliency goals and goals of the 2040 Comprehensive Plan. This warrants further investigation.</p>	<p>The University has decided to eliminate the Microgrid from the Arena project; therefore, the diesel generators identified for backup power to the Microgrid will not be needed for the project.</p> <p>A backup generator will be included in order to meet code requirements for the Arena. The project is evaluating ways to meet the University’s clean energy goals through the design of the project including the relocation of existing solar panels that exist on top of McCarthy Gymnasium.</p>
19 – Noise	

¹³ <https://www.pca.state.mn.us/air-water-land-climate/current-air-quality-conditions>

Comment	Response
<p>The UST neighborhood has experiences a significant increase in noise from rooftop equipment on the new buildings, and from traffic noise with the increased traffic on Cretin Avenue. In particular, the Ford development has significantly increased traffic noise. Also, the modified intersection at Grand and Cretin and the lack of traffic enforcement has resulted in speeding at that intersection and all along Cretin Avenue. Cars on Cretin have been clocked at 45, 50, and 55 mph, and that appears to be more the rule than the exception. Noise levels will increase in the neighborhood, so does it not matter that UST will make a bad situation even worse? To address noise after the fact is not adequate. Data is needed to determine precisely how much noise will be generated by the mechanicals and how that noise would be mitigated. This should be done during the planning phase, not during or after building. Noise is a public health concern, and further investigation is warranted.</p>	<p>Noise evaluation will be completed throughout the design process such as analysis of building wall sections (thickness of insulation, etc.), location and screening of mechanical equipment, and selection of broadcast and audio systems within the arena. Since the Arena is still in the early stages of design, it would be premature to complete an operational noise assessment with the selection of such systems at this time. The University is committed to completing a noise study to evaluate potential noise from the building and to identify noise mitigation options as needed. The project will be required to meet City of Saint Paul noise ordinances and MPCA regulations for noise.</p>
<p>20 – Transportation</p>	

Comment	Response
<p>The traffic study conducted is flawed and insufficient. First, the time period chosen for testing, just prior to a major, forecasted snowstorm, is NOT reflective of typical traffic volumes as drivers were likely off the road in anticipation of the storm. Also, shouldn't a thorough traffic assessment also measure rush hour traffic during all weather conditions? Entering and exiting a property onto Cretin Avenue during stormy or icy conditions is a life-threatening experience.</p> <p>Secondly, the traffic analysis seems to focus on major event games, but it does not address the additional traffic associated with graduations, convocations, employment fairs, youth hockey, non-major event games and other events that UST intends to hold in the proposed facility. These will all contribute to a congested, dangerous traffic situation that already exists on Cretin Avenue, and it is likely to spill onto residential side streets. It is important to keep in mind that this is a RESIDENTIAL AREA where people walk, ride bicycles, try to cross Cretin Avenue with strollers and young children. Many Saint Paul residents cross Cretin Avenue as they walk to the MRCCA area. Recall Goal #4 of the 2040 Comprehensive Plan is to promote "Strong connections to Mississippi River, parks, and trails". Remediation strategies of "Barricades, cones, and wayfinding signage" does NOT meet this goal. The addition of significant traffic into this residential area presents an incompatible mix that is contradictory to the policy goals of the 2040 Comprehensive Plan regarding the reduction of traffic in residential areas. It is also contradictory to the UST carbon neutrality goals and the goals of the Saint Paul Climate Action & Resiliency Plan. More in-depth assessment is warranted.</p>	<p>As stated on Page 4 of the Transportation Study "To determine if the traffic counts were representative of an average day in the study area, MnDOT detector data was reviewed at the I-94/Cretin Avenue interchange from October 2022 to March 2023. Results of the review, shown in Appendix A, indicate that March 30, 2023, was representative (if not slightly higher) of an average day for the study area, therefore, no adjustments were made to the counts."</p> <p>Graduations, conventions, and career fairs are already occurring on campus, therefore, are not a new impact to the area. There is only one auxiliary sheet of ice, and youth hockey teams generally only have 15-20 players, therefore, impacts from youth sports are expected to be minimal.</p> <p>Barricades, cones, and wayfinding signage are temporary event management strategies that are specifically designed to improve pedestrian safety by limiting pedestrian/vehicle interactions.</p>
21 – Cumulative Potential Effects	
<p>Over the past 100 years, UST has undergone an inordinate amount of development and expansion, which has increased dramatically in the last 50 years. It is common knowledge that there will be further development beyond the multi-use complex currently under review. Regardless of whether or not plans have been board approved, UST representatives have openly stated that the east and west blocks will soon be developed and that all athletic facilities will be upgraded to meet best practice standards for Division I athletics. The EAW is not sufficient in assessing the broad impact that UST has imposed</p>	<p>Any new projects proposed by the University that exceed an EAW or EIS threshold as defined by MN State Rules 4410, would be required to complete the appropriate environmental review.</p> <p>If the anticipated redevelopment of the East and West blocks of Grand Avenue exceeds an EAW or EIS threshold as</p>

Comment	Response
<p>on the surrounding community. The cumulative potential effects of UST development should be assessed in total, rather than in a project-by-project, piecemeal fashion. An Environmental Impact Statement (EIS) might be a more appropriate means of assessment since the UST expansion and development has “significantly affected the quality of the human environment.” (National Environmental Policy Act of 1969 NEPA)</p>	<p>defined by MN state rules, the University would be required to complete an environmental review.</p>
<p>21 – Other Potential Environmental Effects</p>	
<p>The proposed project increases the amount of impervious surface in the MRCCA and PCA areas. Not only is this a net increase, it is also a change from discontinuous impervious surfaces to a single, very large, impervious surface. This is counterintuitive to any location, but it is particularly insulting to the MRCCA area where delicate water flow, vegetation, unstable soils, bluff impact zones, and calcareous fen wetlands exist. Further assessment is warranted.</p>	<p>The project is required to comply with all local and state stormwater requirements to treat stormwater run-off prior to discharging into any city or regional stormwater facilities. The proposed project will comply with all local and regional requirements for rate, volume, and water quality.</p> <p>The proposed project will also be required to provide sufficient erosion and sediment control per NPDES SWPP requirements.</p> <p>Per MNDNR, no calcareous fens are located within the project vicinity.</p>

Kathryn Mitchell

Comment	Response
<p>20 – Transportation</p>	
<p>Already, with any activities like graduations, football games etc., the neighborhood becomes a big crowded parking lot with folks parking right up to the edges of alleys and driveways. My neighbors cannot have their</p>	<p>For more information, see the list of mitigation in the section titled Mitigation Plan.</p>

Comment	Response
<p>friends and relatives come over unless they live in walking distance. Clearly there is no provision, once again, for parking. It is possible to put more levels in the Anderson ramp, but there is no interest in doing so we were told at the last meeting. How about some neighborly accountability and responsibility for all the vehicles brought in to this exciting new space?</p>	
<p>Mississippi River Rd is supposed to be a Parkway, but already at 8am and 5pm it has its own rush hour as many commuters prefer this to Cretin Ave, which is also busy and potholed. Unfortunately, most of these drivers do not observe the 25mph limit and many of them are going 40mph+. It is frightening, especially as there are many cyclists on this road. Surely it will be the route of choice for many coming to these events off of highway 5.</p>	<p>Thank you for your comment.</p>

Art Punyko

Comment	Response
<p>18 – Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	
<p>Do the EAW estimates in section 18 for GHG emissions assume any of the mitigation strategies (in 18 b) have been implemented?</p>	<p>No, the proposed operational emissions table 12 in Item 18 is not reduced to reflect any of the potential mitigation strategies listed in Items 18b.</p>
<p>Per section 18, the proposed facility is estimated to have 3X the GHG emissions of the existing structures. Can the city EAW approval process and/or permitting process require UST to provide a certain percentage of photovoltaic and/or wind power generation and/or carbon offsets in order to reduce the off-site electrical generation emissions over the next 50 years?</p>	<p>The University has committed to meet certain clean energy goals to reduce their carbon footprint. The City will continue to encourage project proposers to evaluate to use clean energy generating options.</p>
<p>20 – Transportation</p>	

Comment	Response
In section 20b, there are tables that contain the parking deficit during the different event types and days of the week. Do these estimates assume that any of the mitigation strategies have been implemented?	No, these estimates are the "base" scenario, where no mitigation is implemented.

Saint Paul Seminary

Comment	Response
The Saint Paul Seminary would like to clarify that the driveway access off Summit Ave is a shared drive owned by both the University of St. Thomas (owners of Lot 2) and The Saint Paul Seminary (owners of Lot 1). The driveway is halfway on both lots. This detail was not included in the EAW. The seminary looks forward to future conversations with the University regarding anticipated changes, both structural changes and traffic volume changes, to the shared drive.	Thank you for your comment.

Kelly Vinson-Taylor

Comment	Response
20 – Transportation	

Comment	Response
<p>Marshall & Cleveland were not included as a study intersection, although there was reference to traffic being routed to Cleveland. For that reason, that intersection should be included in the traffic study.</p>	<p>The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff.</p> <p>As stated on Page 39 of the Transportation Study, traffic is only expected to be routed to Cleveland Avenue during post-event conditions if a traffic control officer is utilized at Cretin Avenue/Grand Avenue, and the traffic control officer restricts eastbound left-turn. If this occurs, the signal timing at Cleveland Avenue/Grand Avenue and potentially Cleveland Avenue/Marshall Avenue should be considered for review. For more information, see the list of mitigation in the section titled Mitigation Plan.</p>
<p>Other key factors were not incorporated into the traffic study that need to be considered: The Bridge development is at the beginning of being built out. What impact will there be to Cretin Ave traffic flow as more people move into that development? There is work afoot to create "traffic calming" on Cretin and go from 4 lanes to 3 lanes. If that occurs, this traffic study is irrelevant and the result is that traffic for UST events will be backed up even more. Rapid Bus is being added to Marshall and by doing this new platforms are being added to key intersections (Marshall & Cleveland and Marshall & Cretin) this will change traffic flow in these areas, but was not factored into the study.</p>	<p>Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development."</p> <p>Also stated on Page 29 "On-street parking is assumed to be present along Cretin Avenue (as parking restrictions are generally lifted after 6 pm). Therefore, Cretin Avenue was modeled to have one lane of travel at the on-street parking locations." Therefore, Cretin Avenue would operate similarly to any potential 3-lane facility.</p> <p>Rapid bus lines on Marshall Avenue are anticipated to have minimal impacts on the analysis performed as part of this study.</p>

Comment	Response
<p>Pg. 8 - references that there is not a crash problem currently. What about when the new volume of traffic is added? How will that impact crash volume? What about pedestrians trying to cross Cretin when it's dark at 4:30 in winter? It is currently not safe to cross Cretin unless you do so at a traffic light.</p>	<p>Note the multipurpose arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions.</p> <p>Several event management strategies are recommended on Page 36 and 39 and Figures 12 and 13 of the Transportation Study. These management strategies primarily focused on reducing pedestrian/vehicle conflicts, thus improving pedestrian safety. The majority of pedestrians will be routed to either the Cretin Ave/Summit Ave or Cretin Ave/Grand Ave intersections, which are signalized. In addition, the study recommends monitoring the Cretin Ave/Goodrich Ave crossing and provide traffic control officers or campus crossing guards if the crossing is heavily utilized and/or safety issues occur.</p>
<p>Pg 14 - Total net loss of approx. 265 surface parking spaces. That is significant and one of the mitigation strategies is to hold large events on weekends so spectators can park in the neighborhood. I can attest that Dayton Ave. between Finn & Cretin during the academic year is "wall to wall" cars parked on both sides of the street due to student rentals in the neighborhood and St. Paul's focus on increasing density. Given these events will be held in winter (Nov. thru March), when poor snow plowing causes the streets to narrow, cars driving down Dayton cannot pass each other unless by chance there is an open parking space (which is rare) and will need to back up down the street the allow the other car to get by. Adding more traffic and fewer UST parking spaces is going to make this existing issue much worse.</p>	<p>The strategy to hold large events on the weekend is because there is more available parking on campus during the weekend. University classes generally do not occur on weekends, which results in several of the campus parking spaces to remain open for use.</p> <p>Thank you for the comment about Dayton Avenue and winter conditions.</p>
<p>The study made reference to 75% of the students are going to walk or ride bicycles. Walking yes, but riding bicycles in hockey and basketball season which is winter...that is highly unlikely and needs to be adjusted.</p>	<p>75 percent represents the total number of students walking or biking, most, if not all, are assumed to be walkers. This assumption is considered reasonable based on the number of students that live within walking distance of the arena.</p>

Comment	Response
<p>The study does not include Division 1 schools that have built a major arena in a city neighborhood vs. schools like Creighton who hold their basketball events in an area near downtown. Are there any? Has this been done before? Building an arena in a city neighborhood is much different than Creighton or schools in rural areas where there is access to more land to build parking and have fewer traffic issues.</p>	<p>The similar programs reviewed in the Transportation Study are based on numerous division 1 programs within UST's conference, excluding the top and bottom capacity programs to eliminate outliers. .</p>
<p>One entrance in and out of the arena and the parking ramp on Cretin is a significant bottleneck. Even with a traffic cop, how will anyone coming out of the ramp after a game be able to make a left onto Cretin to get to 94? And if they are required to go right, they will be try to weave around on the neighborhood streets trying to find there way out.</p>	<p>Traffic control officers have the ability to stop pedestrians and traffic to allow vehicles exiting the parking ramp to make a left-turn movement. This could also be achieved through traffic signal improvements at the Cretin & Grand intersection.</p>
<p>Overall, it seems the University of St. Thomas is trying to "squish" an arena into a small space and in the process is going to create multiple issues that will negatively impact the neighborhood and the spectator experience. I highly recommend that the traffic study factor in the issues mentioned above and be conducted again during the upcoming winter months when there will be a more apples to apples comparison.</p>	<p>Thank you for your comment.</p>

Donn Waage

Comment	Response
<p>Throughout this EAW and studies there are numerous references to mitigations that St Thomas could do. I believe the community needs real commitments instead of inadequate studies and hoping for the best.</p>	<p>Comment noted. The mitigation strategies outlined in the EAW and in the section titled Mitigation Plan will be addressed by the City through the identified approvals and permit required for the project.</p>
<p>6 – Project Description</p>	

Comment	Response
<p>St Thomas believes its current sports facilities are inadequate, which is why they seek to build the Arena. St Thomas' goal is to fill the Arena for each of 66 regular games and to rent it out for profit. The EAW does not give the basis for estimates of game attendance, but they appear to be based on last year's games in the inadequate facilities. In addition, St Thomas' men's and women's hockey and women's basketball teams had losing seasons last year. More fans typically support winning teams. St. Thomas seems to be saying, "We are building this big expensive building, but don't worry, we won't use it much." Who would build a \$125 million building and state that it would only be used to capacity 3-4 times a year? In assessing the financial costs to the City and the impacts on local residents, a more realistic assessment of game attendance considering St Thomas' attendance GOAL, must be developed.</p>	<p>As shown on page 27 and Figure 7 of the Transportation Study, the projected attendance was based on numerous division 1 programs within UST's conference, excluding the top and bottom capacity programs to eliminate outliers. Note the UST attendance was included in the graphic for reference, however, was not included in the similar program average attendance, given UST's current facilities are not able to accommodate larger attendances and their recent transition to Division-1 sports.</p>
<p>Last year St Thomas sought and received an expansion of its liquor license to include most of the campus and drastically increased the hours liquor can be served. St Thomas' POLICY currently does not allow alcohol at sports events. Will this change? Will alcohol be served at other activities and events at the Arena?</p>	<p>Thank you for your comment. Comment not related to the EAW.</p>
<p>The EAW, and St Thomas officials, have stated they will rent out the Arena for events. The EAW contains no estimates or analysis of the possible number or impact of events. The EWA refers to weddings and speakers; what about concerts? What times would these events be held? Will there be any time limits? Would alcohol be allowed A fair estimate of the number and impact of events is critical to understanding the impact of this project because a few of the mitigating factors suggested for St Thomas sports activities could be applied to them.</p>	<p>The primary scheduled, reoccurring use of the arena is for basketball and hockey events and therefore was selected as the focus of the EAW transportation analysis. The events studied represent a worst-case scenario from a traffic and parking perspective. "Non-athletic events" are currently unknown, likely infrequent, and are anticipated to be significantly less impactful on traffic and parking than hockey and basketball games as they would have a much larger student to non-student ratio.</p>
<p>14 – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	

Comment	Response
<p>The proposed Arena will be built on North America’s largest migratory bird flyway. The building will be the tallest in the area and yet there is no recognition of the potential deadly impact on migratory birds. US Bank Stadium, although further from the Mississippi River, is one of the region’s most deadly building for birds due to its height and lighting. The national Audubon Society and Minneapolis Audubon sued the Stadium Authority over the US Bank migratory bird issue. There is no recognition of this important environmental issue in the EAW. Mississippi River zoning has been in effect since the 1970s and St Thomas commented on the recent Mississippi River Corridor Critical Area ordinance should be aware of its requirements.</p>	<p>The project site is located within the Mississippi River Twin Cities Important Bird Area (IBA) . The Mississippi River IBA includes the Mississippi River and its adjacent floodplain forest and upland areas extending for 38 river miles through 4 counties from Minneapolis to Hastings. According to the MN DNR, IBAs are a voluntary and non-regulatory part of an international conservation effort to bird populations. The information above was added as a correction to the EAW after receiving recommendations from the MN DNR.</p> <p>The project will be required to comply with City of Saint Paul and MRCCA lighting ordinances. Fixture modeling and photometric analysis will be completed for all site and building lighting to analyze light levels for the project.</p>
<p>16 – Visual</p>	
<p>Another major limitation of this EAW is that it includes no mention of lighting. Most basketball and hockey games occur between November 1 and March 1. The sun sets at 6:00 p.m. on November 1 and 6:01 p.m. on March 1. With dramatic increases in auto and pedestrian traffic additional lighting may be necessary. What additional lighting will be at the arena and will this lighting be projected downwards rather than randomly upward impacting both birds and the neighborhood? Thoughtful design and lighting could save the lives of thousands of birds over the life of this project.</p>	<p>The project will comply with MRCCA and City lighting ordinances. Fixture modeling and photometric analysis will be completed for all site and building lighting to analyze light levels for the project. Additionally, the University standard for site lighting is to use LED cut-off light fixtures with a maximum nominal color temperature of 4000K.</p>
<p>18 – Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	
<p>The EAW estimates only 20% of the game attendees will be students. With the impact of carbon on climate change such a major part of EAW review, should there be an assessment of the environmental cost of fans traveling from the suburbs to St Thomas for a game? Would there not be much less climate impact by building this arena in a suburban location? Will the new arena end its ranking as a Green College in the Princeton Review?</p>	<p>Thank you for your comment. The Greenhouse Gas Emissions evaluation focuses on operational emissions for the proposed facility which was discussed in the EAW.</p>

Comment	Response
20 – Transportation	
<p>The EAW made a traffic count on March 30, 2023. That study is irrelevant without including the City’s traffic study for Highland Bridge which estimates up to 4,893 new trips daily on Cretin and Cleveland Avenues. The City also just approved the Summit Ave. Regional Bikeway which will substantially impact both auto traffic and parking. The Potential Cumulative Effects (page 39) of these APPROVED projects should be included in this report. There is no indication that these projects were included despite the Cumulative Impacts requirement. I asked two staff people in the “Transportation area” of the July 12 Arena Workshop and neither could tell me if the traffic study included the City’s Highland Bridge estimates. If an honest traffic study were done it may indicate a need to enlarge Cretin Avenue, <u>at public expense</u>.</p>	<p>Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development."</p> <p>The Summit Avenue bikeway improvements are discussed on Page 6 of the Transportation Study "Note that Summit Avenue is currently undergoing a public visioning process to determine the long-term layout of the corridor." While the Summit Bikeway is approved, project construction is not expected for 10 to 15 years, and is not expected to impact parking within the study area (parking impacts are mostly East of Lexington).</p>
<p>The report identifies real potential parking problems for the neighborhood. The EAW estimates the maximum parking space demand at 1,420 for basketball and 1,050 for hockey. It simply is not credible to expect an activity with 5,000-7,000 attendees will use so few parking spaces. In addition, the APPROVED Summit Avenue Regional Bikeway would likely remove many parking spots and reduce access by vehicles. Again, there is no indication that these potential impacts were included in the Study. The report identifies many things St Thomas could do to mitigate traffic and parking problems but there is no indication that they will be implemented. Because some of these “solutions” will have further negative impacts they should be considered now, before the Arena is built, instead of on a crisis basis.</p>	<p>Event modal split assumptions are documented in Table 10 on Page 24 of the Transportation Study, which were based on numerous discussions with UST and City staff.</p> <p>While the Summit Bikeway is approved, project construction is not expected for 10 to 15 years, and is not expected to impact parking within the study area (parking impacts are mostly East of Lexington).</p>
<p>Construction impacts are of course temporary but real. Thousands of trucks and workers will come into the neighborhood. How will these, traffic, parking, noise and lighting impacts be mitigated. Among other things, will there be a reasonable person at St Thomas assigned to help mitigate construction impacts?</p>	<p>The project and construction will be required to comply with all City Ordinances as it relates to noise, odors, dust, and construction access and truck routing. The University</p>

Comment	Response
	will work with the arena design-build team to mitigate construction impacts to the extent possible.

Maggie Wirth-Johnson

Comment	Response
<p>Given the very legitimate points and questions raised by this group, I urge that plans and timelines for this stadium be halted until these neighbors' points can be addressed thoroughly, and that a new report be issued which contains responses to these questions and concerns. Ignoring the 2040 St. Paul Comprehensive Plan and a goal of carbon neutrality is not the direction St. Thomas should be taking.</p>	<p>Thank you for your comment.</p>
<p>In the 33 years my husband and I have lived in St. Thomas neighborhood, we have seen almost non-stop building and expansion of the campus, resulting in more noise in the area and way more traffic on Cretin Avenue. The noise of the excess traffic is one thing we contend with. Speeding cars on Cretin Avenue has resulted in Dayton-Cretin and Selby-Cretin intersections being almost impossible to cross during heavy traffic times. I have to data to back up this claim, but my impression is that St. Thomas traffic (cars going to and from the school) is the major reason for the heavy use of this street. It's very clear that this is so when one observes the great lessening of Cretin traffic during school breaks. According to the St. Paul Transportation Committee of UPDC, these two spots are where cars are LEAST likely to stop for crossing pedestrians. The very idea that St. Thomas would like to have yet another building that will bring even MORE traffic to this area is abhorrent to me and to others.</p>	<p>Note the multipurpose arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm), and is only expected to last for 20-30 minutes before and after the event.</p>

Carol Walsh

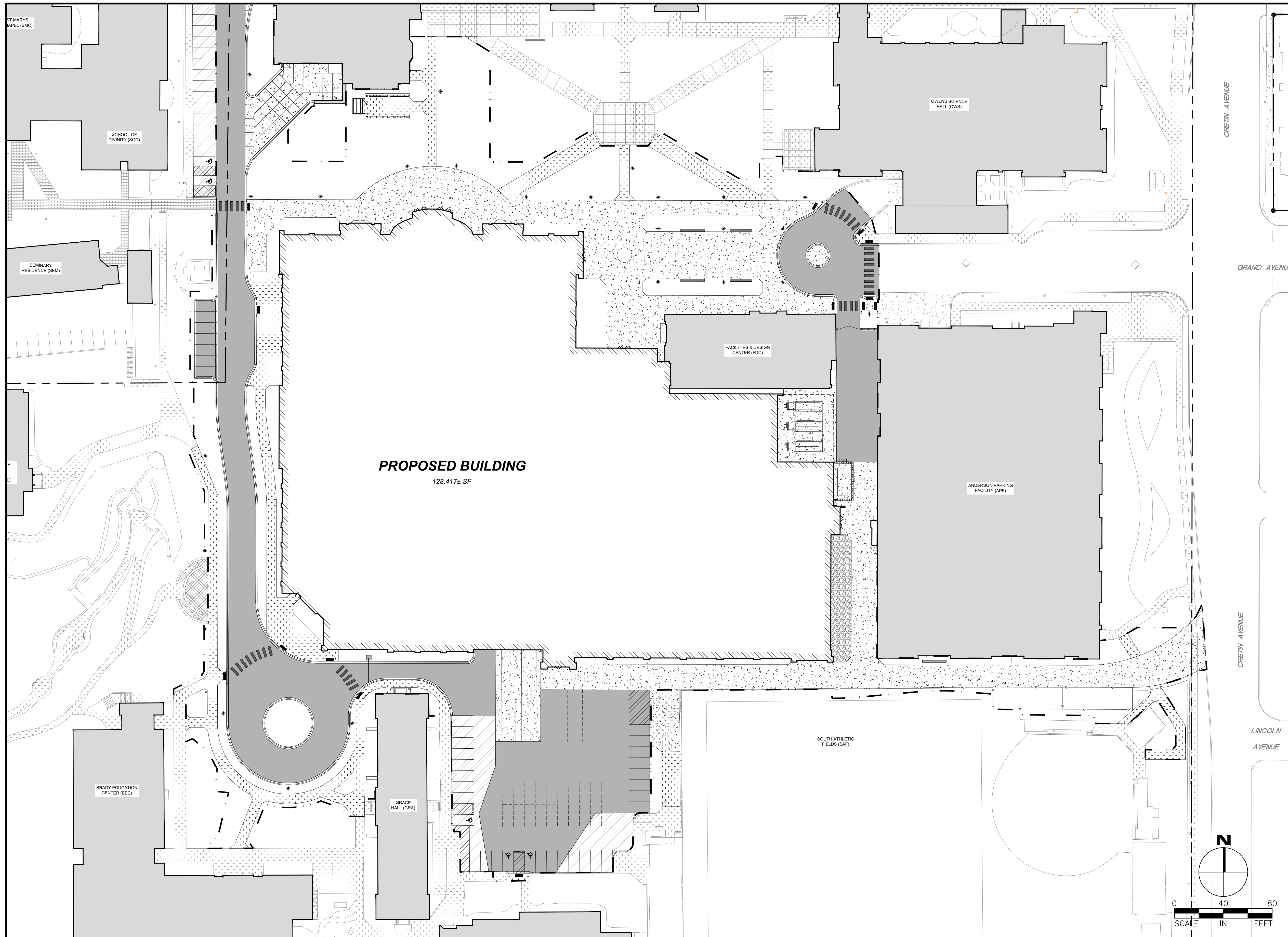
Comment	Response
<p>Please be mindful of pedestrians – students, neighbors of all ages, visitors – and clearly mark and maintain areas where you can cross safely. Keep the walking stick man on for adequate amount of time to cross streets. Ensure adequate lighting for pedestrians and cyclists.</p>	<p>Thank you for your comment.</p>

Rosemary Maun

Comment	Response
<p>My house was built in 1926 and it's been my Home now just short of 50 years. My three sons were all raised here. I planned on being here for the duration. What saddens me, besides all the unnecessary devastation to a lovely neighborhood - it just isn't right! I'm afraid the day will come when I will see someone killed while trying to cross Cretin Avenue on Goodrich. There has to be a better solution. I'm asking that you find one.</p>	<p>Thank you for your comment. Pedestrian safety is important to the City and the project proposer. The City and the proposer will continue to evaluate pedestrian safety improvements at the intersections adjacent to the stadium during the design phase.</p>

APPENDIX D

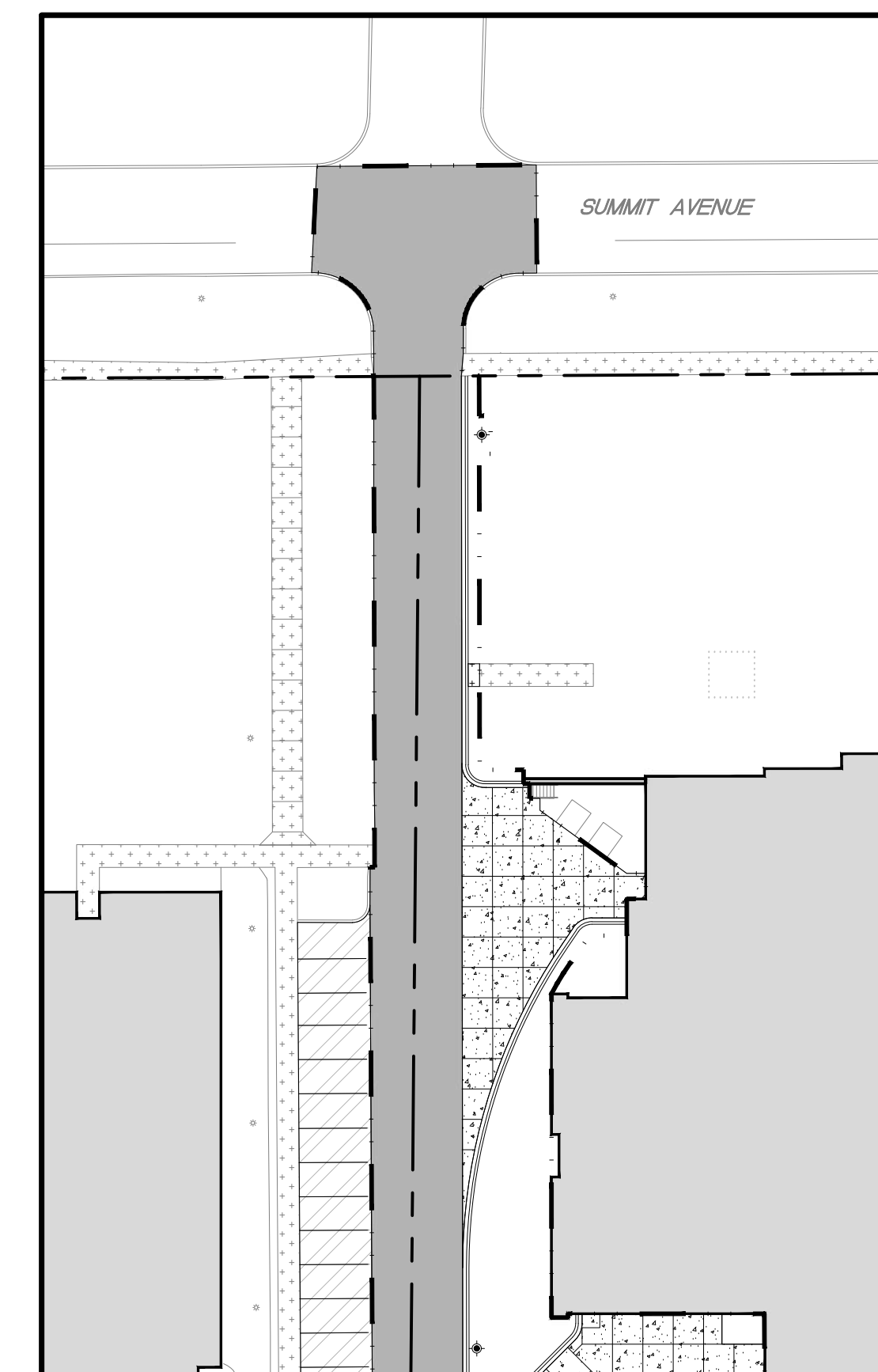
Updated Site Plan



LEGEND:

EXISTING	PROPOSED	
[Symbol]	[Symbol]	PROPERTY BOUNDARY
[Symbol]	[Symbol]	LOT/TRACT LINE
[Symbol]	[Symbol]	CURB
[Symbol]	[Symbol]	EASEMENT
[Symbol]	[Symbol]	BITUMINOUS
[Symbol]	[Symbol]	MILL & OVERLAY
[Symbol]	[Symbol]	CONCRETE PAVEMENT
[Symbol]	[Symbol]	CONCRETE SIDEWALK
[Symbol]	[Symbol]	GRAVEL
[Symbol]	[Symbol]	CHAIN LINK FENCE
[Symbol]	[Symbol]	WOOD FENCE
[Symbol]	[Symbol]	NORMAL WATER LEVEL
[Symbol]	[Symbol]	DRAINAGE SWALE
[Symbol]	[Symbol]	BUILDING SETBACK LINE
[Symbol]	[Symbol]	PARKING SETBACK LINE
[Symbol]	[Symbol]	CONSTRUCTION LIMITS

SUMMIT AVE IMPROVEMENTS:



Appendix B

Agency Comments

From: [Josh Williams](#)
To: [Mayer, Susan](#)
Cc: [Payne, Ashley](#); [Anthony Adams](#); [Brent Clark](#); [Benner, Jerome B.](#)
Subject: Fw: University of St. Thomas Multipurpose Arena EAW Update - DNR Comments
Date: Thursday, November 7, 2024 5:28:15 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[2023-00262NHletter.pdf](#)
[2023-07-27-UniversityofStThomasMultipurposeAreaEAW-DNRcmtltr.pdf](#)

From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Sent: Thursday, November 7, 2024 4:48 PM
To: Josh Williams <josh.williams@ci.stpaul.mn.us>
Cc: Anthony Adams <Anthony.Adams@RyanCompanies.com>
Subject: University of St. Thomas Multipurpose Arena EAW Update - DNR Comments

Think Before You Click: This email originated **outside** our organization.

Dear Josh Williams,

Thank you for the opportunity to review the updated University of St. Thomas Multipurpose Arena EAW. I have attached DNR's previous comment letter since many of the comments are still relevant to the expanded project. Please note that Section 14 (Rare Features) should be completed using the information provided in the attached Natural Heritage Review letter (MCE# 2023-00262). These reviews are only considered current for one year, and it does not appear that an updated letter was obtained for the EAW Update. This can be done by emailing Review.NHIS@state.mn.us to request an update to the previous Natural Heritage Review. Please use MCE# 2023-00262 in the subject line of your correspondence.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her/hers

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov

m DEPARTMENT OF
NATURAL RESOURCES



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

Transmitted by Email

July 27, 2023

Josh Williams, Principal Planner
City of St. Paul
25 West Fourth Street
St. Paul, MN 55102

Dear Josh Williams,

Thank you for the opportunity to review the University of St. Thomas Multipurpose Area Environmental Assessment Worksheet (EAW) located in Ramsey County. The DNR respectfully submits the following comments for your consideration:

1. Page 17, Groundwater. Please note that the project area contains the St. Paul Seminary Spring (field verified by the University of Minnesota Earth Sciences Dept.; Glacial-Decorah contact). This spring is located near the head of the ravine/stream that slopes towards the Mississippi River along the western boundary of the project area. The EAW identifies the area adjacent to the spring as the Grotto (page 22, *Other Surface Waters*), and describes measures that will be taken to avoid impacting the groundwater hydrology. This spring is likely the source of the National Hydrography Dataset stream mapped within the Grotto area, which is also a mapped Minnesota River Critical Corridor Area (MRCCA) Significant Existing Vegetative Stand. Please be aware of the location and depth of this spring when determining the placement of utilities and footings in order to avoid impacting groundwater hydrology.
2. Page 20, Stormwater. We recommend that BWSR-approved, weed-free, native [seed mixes](#) be used to the greatest degree possible in stormwater features in order to provide pollinator habitat for the federally endangered Rusty-patched Bumble Bee.
3. Page 24, Rare Features. This section of the EAW should mention that the entire project area is located within the [Mississippi River Twin Cities Important Bird Area](#) (IBA), which is a significant corridor for migrating birds. [Here](#) is a complete list of bird species documented within the IBA, which may be found within the project area.
4. Page 24, Rare Features. This section of the EAW states that results of the DNR Natural Heritage Review are pending, however a final letter was issued on May 17, 2023. The Natural Heritage letter has been attached so that it may be included with DNR comments.
5. Page 29, Visual. Lighting for this development will be important due to its location within an IBA and MRCCA. Animals depend on the daily cycle of light and dark for behaviors such as

hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. In addition to the undesirable effects of upward facing lighting, the hue of lights can also affect wildlife. LED lighting has become increasingly popular due to its efficiency and long lifespan. However, these bright lights tend to emit blue light, which can be harmful to birds, insects, and fish. The DNR recommends that any projects using LED luminaries follow the [MnDOT Approved Products for luminaries](#), which limits the uplight rating to 0, and the maximum nominal color temperature to 4000K. Please choose products that have the lowest number for backlight and glare.

We recommend that all non-essential lighting be turned off during the Mayfly hatch as well as follow the Audubon Society's Lights Out program. This program advocates for darkening all buildings and structures during the bird migration from midnight until dawn March 15 - May 31 and August 15 - Oct 31. Information on this program can be found at: <http://mn.audubon.org/conservation/lights-out-faq>.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Melissa Collins". The signature is written in a cursive style and is set against a light blue rectangular background.

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

CC: Anthony Adams, PE, Ryan Companies

Equal Opportunity Employer

From: [Meincke, Alexander C CIV USARMY CEMVP \(USA\)](#)
To: [Mayer, Susan](#); [Josh Williams](#); [*CI-StPaul_StThomasArena_EAW](#)
Subject: RE: ACM asked PL 10/8 [Non-DoD Source] Environmental Assessment Worksheet Update: University of St. Thomas Multipurpose Arena - Ramsey County, MN
Date: Thursday, October 10, 2024 9:56:49 AM

The Corps of Engineers St. Paul District Regulatory Division (the Corps) recently received this request for a Environmental Assessment Worksheet.

Our office is committed to efficient, helpful service. It is unclear if your project will have impacts to jurisdictional waters. If your project will have impacts to aquatic resources, please submit a permit application with the impacts clearly identified and we can assist you through our permit review process if authorization is required.

You may also request a pre-application meeting to discuss your project prior to submitting a permit application. You can find more information on our permit program and our joint application here: <https://www.mvp.usace.army.mil/Missions/Regulatory/Permitting-Process-Procedures/>. **Be sure to select the pre-application box on the joint application.*

Please note this recommendation is only pertaining to the Corps process and does NOT indicate whether a review is required from the state or local authorities.

If we do not receive a response from you within 3 business days we will assume nothing further is needed from our office.

Alex Meincke
Lead Project Manager, South Branch, Regulatory Division
St. Paul District, US Army Corps of Engineers
332 Minnesota Street, Suite E1500
St. Paul, Minnesota 55101
Office Phone: (651) 290-5485

From: Mayer, Susan <Susan.Mayer@kimley-horn.com>
Sent: Monday, October 7, 2024 5:34 PM
To: Josh Williams <josh.williams@ci.stpaul.mn.us>; StThomasArena_EAW@ci.stpaul.mn.us
Subject: ACM asked PL 10/8 [Non-DoD Source] Environmental Assessment Worksheet Update: University of St. Thomas Multipurpose Arena - Ramsey County, MN

As the Responsible Governmental Unit (RGU), the City of Saint Paul has prepared an Environmental Assessment Worksheet (EAW) Update for the University of St. Thomas Multipurpose Arena. The notice of document availability will be published in the *EQB Monitor* on October 8, 2024.

The proposed University of St. Thomas Lee and Penny Anderson Arena (Arena) will be a redevelopment of an approximately 6-acre site located on the University of St. Thomas (UST) South Campus in Saint Paul, Minnesota. Additional development on and near the UST South Campus has been incorporated into this analysis, including the completed Schoenecker Center, the proposed expansion of the Center for Microgrid Research (Microgrid Project), and the proposed St. Paul Seminary Parking Lot (SPS Parking Lot) for a total redevelopment area of approximately 11.7-acres. Copies of the EAW are being distributed to agencies on the current Minnesota Environmental Quality Board distribution list. The EAW can be accessed electronically on the City of Saint Paul's website at: https://stpaul.gov/StThomasArena_EAW

Written comments on the EAW will be accepted until November 7, 2024 at 4:00 PM and should be directed to:

Josh Williams
Principal Planner
City of Saint Paul
25 West Fourth Street
St. Paul, MN 55102
StThomasArena_EAW@ci.stpaul.mn.us

AGENCY COMMENTS

Minnesota Department of Natural Resources

Comment	Response
<p>Thank you for the opportunity to review the updated University of St. Thomas Multipurpose Arena EAW. I have attached DNR's previous comment letter since many of the comments are still relevant to the expanded project. Please note that Section 14 (Rare Features) should be completed using the information provided in the attached Natural Heritage Review letter (MCE# 2023-00262). These reviews are only considered current for one year, and it does not appear that an updated letter was obtained for the EAW Update. This can be done by emailing Review.NHIS@state.mn.us to request an update to the previous Natural Heritage Review. Please use MCE# 2023-00262 in the subject line of your correspondence.</p>	<p>Thank you for your comment. The DNR's previous comment letter and NHIS letter (attachments to this comment) were addressed in the September 2023 Findings of Fact. A notice of project update was submitted via the NHIS portal on August 2, 2024 and no correspondence was received. An updated NHIS review request was submitted via email to the DNR on November 15, 2024, and via the NHIS portal on November 26, 2024 and the results are pending. The City does not anticipate major updates in the DNR's updated review.</p>

U.S. Army Corps of Engineers

Comment	Response
<p>If your project will have impacts to aquatic resources, please submit a permit application with the impacts clearly identified and we can assist you through our permit review process if authorization is required.</p>	<p>Thank you for your comment.</p>

Appendix C

Public Comments

From: jerome abrams <jeromeabr@comcast.net>
Sent: Friday, November 1, 2024 10:22 AM
To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>
Subject: EAW comments

You don't often get email from jeromeabr@comcast.net. [Learn why this is important](#)

Attached are comments regarding the UST arena EAW update 10012024.

Thank you.

Jerome H. Abrams
151 Woodlawn Avenue
St. Paul, MN 55105

From: [Peter Leggett](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Fw: EAW for UST arena
Date: Tuesday, November 5, 2024 3:15:51 PM
Attachments: [EAW 2024 Comments 11 01 2024.docx](#)

-

Peter E. Leggett

Chief of Staff
Pronouns: he / him / his
Office of Mayor Melvin Carter
390 City Hall
Saint Paul, MN 55102
P: 651-266-8518
peter.leggett@ci.stpaul.mn.us
www.StPaul.gov

From: jerome abrams <jeromeabr@comcast.net>
Sent: Tuesday, November 5, 2024 01:00 PM
To: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>
Subject: EAW for UST arena

You don't often get email from jeromeabr@comcast.net. [Learn why this is important](#)

Think Before You Click: This email originated **outside** our organization.

Mayor Melvin Carter:

The University of St. Thomas arena, 40% the size of the Xcel Energy Center, is situated in an environmentally sensitive site without the infrastructure to support it. It poses environmental, health and safety concerns that have not been addressed. The city approved the initial EAW that was ruled by the Court of Appeals to be arbitrary and capricious. The court required a new EAW. The revised EAW remains incomplete and insufficient. My concerns regarding environmental, health, and safety risks are detailed in the attached document.

As mayor of St. Paul, you have taken an oath of office that states you will uphold the constitution of the state of Minnesota. Article I Section I states "Government is instituted for the security, benefit and protection of the people..."

Approval of the UST arena in an environmentally sensitive location that does not have the necessary infrastructure risks the environment, health, and safety of residents in the adjacent neighborhood. Approving the plan for the UST multipurpose arena described in the revised EAW does not you're your constitutional requirement to provide security, benefit, and protection. As a tax paying resident of St. Paul, I am asking you to fulfill your oath of office and require, at a minimum, an EIS. Thank you.

Sincerely yours,

Jerome H. Abrams
151 Woodlawn Avenue
St. Paul, MN 55105

EAW 2024 Comments

Water resources

With respect to water resources, emission of radon gas is a health risk that arises from construction of the University of St. Thomas (UST) multipurpose arena. Radium (Ra) concentrations in groundwater have been highly correlated with sodium chloride concentrations in saline aquifers (Sturchio, NC et al., *Applied Geochemistry* 16:109(2001); Vinson, A.S. et al., *Chemical Geology* 260:159(2009)) as a result of increased competition for adsorption sites from increased concentration of Na⁺ ions (Krishnaswami, S. et al., *Water Resources Res*, 18:1663(1982); Sanders, L.M. et al., *Water Air and Soil Pollution*, 224:1742 (2013); Tamamura, S. et al. *J of Radioanalytical and Nuclear Chem*, 299:569(2014)). Langmuir and Riese noted that Ra solubility can be increased by the formation of radon-chloride complexes in saline waters (Langmuir, D. and Riese, A.C., *Geochimica et Cosmochimica Acta*, 49:1593(1985). The experimentally observed correlation between Ra and salt in aquifers led to the hypothesis that deicing could produce increased radium and radon concentrations. This hypothesis was tested by McNaboe and colleagues, who studied groundwater data from a monitoring well field installed around a pavement covered parking lot at the University of Connecticut, Storrs campus. (McNaboe L.A. et al., *Water Air Soil Pollution* 228:94(2017). The study site included an asphalt parking lot of 0.21 acres (860 square meters). Water table depth ranged from 3.3 ft (1 m) to 9.8 ft (3 m). Six monitoring wells were studied. The highest Na⁺ concentrations measured were found directly downgradient from the parking lot, a finding that confirmed that high levels of salt reach the groundwater. The study also noted that the salt traveled down gradient with the groundwater flow. Schubert and colleagues reported that Rn will more readily partition to the gas phase under warmer and increasingly saline conditions (Schubert, M. et al., *Environmental Science and Technology* 46:3905(2012). In the paragraph devoted to the heat island effect, the EAW states, “ Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council’s Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat.” The urban heat island effect can amplify the production of radon. With shallow groundwater and increased transition to the gas phase for radon from increased salinity, an increase in flux of Rn to overlying buildings could occur (Krewski, D. et al., *Epidemiology* 16:1037(2005). The authors concluded that deicing salt contamination of groundwater can serve to mobilize Ra and Rn in the subsurface. The results would be applicable to any salted location where there is a high infiltration rate to groundwater, such as an urban riparian floodplain (Ledford S.H. et al., *Environmental Science and Technology*, 50:4979 (2016))

Increased radon efflux is a public health concern: Rn exposure has been identified as the second leading cause of lung cancer in the USA (Darby M.E. et al., *Groundwater*, doi:10.1111/gwat.12454 , 2001).

UST reports the impermeable surface to be 5.8 acres (23472 square meters) and a ground water depth of 6ft to 12 feet (1.8 to 3.7 meters). The surface area is approximately 28 times the area in the McNaboe study, and the groundwater depth is comparable. The increased surface area would require amounts of deicing well above that in the McNaboe study, which would likely increase saline concentration in the groundwater. Efflux of radon gas would then be increased.

Radon gas is currently found in Ramsey County. Data for Ramsey County obtained by the Minnesota Department of Health found that 65.6% of properties tested from 2010-2020 had radon concentrations of equal to or greater than 2 pCi/L and 29.4% had concentrations equal to or greater than 4 pCi/L. The EPA states that there is no known safe level of radon exposure and recommends mitigation for radon levels between 2 pCi/L and 4 pCi/L.

The EAW does not analyze groundwater composition, groundwater contamination, or groundwater and subsurface radium or radon concentrations. The EAW plan for reducing risk from salting is vaguely described as a multi step process. Specific mitigations are once again absent from the EAW. No analysis of health risk is provided.

The health hazard of radon gas liberated by the UST multi use arena to the surrounding neighborhood residents must be addressed and mitigated.

Air and Greenhouse Gases

The National Hockey League (NHL) reported that a single game in a typical NHL arena, such as the Xcel Energy Center, produces 408 tons of carbon dioxide. The proposed UST arena is approximately 40% the area of the Excel Energy Center. Per game, the UST arena can be estimated to release 163 tons of carbon dioxide. Assuming that a game lasts approximately 4 hours and that the ice sheet would be maintained for at least 24 hours, the carbon dioxide emissions would be 978 tons for each game day. The UST 2024 - 2025 schedule for men's hockey, women's hockey, men's basketball, and women's basketball lists 58 home games. Assuming the 58 games listed in the 2024-2025 are representative of future games, carbon dioxide emissions would be 56724 tons for the home sports schedule. The home sports schedule extends from October 1, 2024 through March 1, 2025 or 152 days. Assuming the ice sheets are maintained for the entire hockey season, the carbon dioxide emissions would be 148656 tons. If the ice sheets are maintained for the entire year for, for example, full year hockey practice and for summer hockey camps, carbon dioxide emissions would be 356970 tons.

This number does not include the additional emissions from the practice schedule, games played by teams other than UST teams, and other events, such as concerts. This number is greater than the 2515 tons carbon dioxide/year reported on page 50 for combustion and grid base equipment.

Another method of calculating carbon dioxide emissions uses the energy consumption of the arena in MWh. The International Ice Hockey Federation Guide to Sustainable Arenas states the average energy consumption for an average size hockey arena is 3000 MWh per day. Then, for an average arena with average energy consumption, and using the EPA conversion factor of 0.417 metric tons of carbon dioxide/MWh, the daily production of carbon dioxide is given by:

$$(3000\text{MWh}/\text{day})(0.417\text{ metric tons}/\text{MWh}) = 1251\text{ metric tons}/\text{day}$$

For one year, the carbon dioxide emissions would be $(1251)(365) = 456,615$ metric tons/year

For short tons, the amount would be $(1.012\text{ short tons}/\text{metric ton})(456615\text{ metric tons}/\text{year}) = 462094$ short tons/year. The EAW reports that 929 tons carbon dioxide/year of a total of 2515 tons carbon

dioxide per year would be produced by combustion. Using these values, combustion accounts for 37% of carbon dioxide emissions or $(0.37)(462094)=170974$ short tons carbon dioxide/year. If the arena uses 1000 MWh/day, carbon dioxide emissions would be 56421 short tons/year. This value is greater than the reported value of 929 tons/year. Again, the 2024 – 2025 men’s hockey, women’s hockey, men’s basketball, and women’s basketball season extends from October 1, 2024 through March 1, 2024. Presumably the ice sheets would be maintained for the 152 days of the sports schedule. Then for energy consumption of 3000 MWh/day, carbon dioxide emissions would be 190152 short tons, and for 1000 MWh/ day, the carbon dioxide emissions would be 62750 short tons of carbon dioxide emissions. Both numbers are greater than 929 short tons of carbon dioxide emissions per year. The EAW statement that proposed operational emissions from combustion (arena and microgrid) stationary equipment are 929 tons/year is significantly less than the amount calculated above. Although the EAW states that the EPA Greenhouse Gas Calculator was used, the assumptions made and the data employed are not specified. In addition, the generators that will produce this energy, the load, number of generators, load factor, annual runtime, and annual generator production are not specified.

Appropriate analysis must specify the energy requirements of the arena, the duration of the need for this amount of energy, and the specific type of stationary generators that will produce this amount of energy.

Additional air pollution sources

The EAW states, “The Microgrid Project is proposed to further expand the University’s microgrid testing and research capabilities that exist on campus and will include mechanical equipment such as three 500 kW generators ...” On page 9, the EAW states, “The use of the Microgrid Project does not have any direct relationship to the use of the Arena.” It then contradicts itself on page 13 and states that “the project is being considered for connection to the campus microgrid for back-up power during outages or emergency events.” Frequently, diesel fuel is used to power generators. The use of diesel generators can cause pollution from GHG emissions and from ultrafine particle emissions.

Facilities Engineering Associates (FEA) analyzed a typical diesel generator system with the following characteristics:

- Facility load = 2 Megawatts
- Generator Redundancy = 2N
- Generator Unit Rating = 2 Megawatts
- Number of Generators Running = 2 Generators
- Generator Running Capacity = 4 Megawatts
- Generator Load Factor = 50% (each 2MW Generator will carry 1 Megawatt of load)
- Annual Generator Runtime = 100 hours (EPA limit for testing and maintenance)

- Annual Generator Energy Production = 200 Megawatt-Hours

With the generator load factor (50%) and the annual generator runtime (100 hours) a typical engine fuel consumption rate of 78 Gallons/Hour at 50% load, annual fuel consumption is approximately 15,600 Gallons / Year

The EPA/Department of Transportation (Federal Register 2010) uses the conversion factor

10.180 x 10⁻³ Metric Tons of CO₂ / Gallon of Diesel Fuel

to convert gallons of diesel fuel to metric tons of CO₂. The annual CO₂ emissions from these typical generators would then be 159 Metric Tons of CO₂/Year.

The EAW contains no description of the type of generator. It does not specify the facility load, the run time hours, or the fuel consumption. The environmental and health consequences from the emissions of both carbon dioxide and particulate matter produced by the generators used to provide refrigeration for maintaining the ice surface are absent from the EAW. Using the information for typical diesel generators, and using the EAW description of three 500 kW generators, 131.2 US tons of carbon dioxide would be emitted per year for 100 hours of run time. 100 hours represents approximately 1% of a year. The EAW does not specify the type of generators or their expected use over the duration of the project. The EAW must include include generator load factor, and annual generator runtime.

A further significant health risk from diesel engines is the emission of PM 2.5 particles, fine particles with an aerodynamic diameter less than 2.5 microns. Epidemiological studies show that asthma, lung dysfunction, lung cancer, and other related diseases are positively correlated with increased particulate matter exposure. (Yen-Yi Lee, et al. *Aerosol and Air Quality Research* 17:2424a(2017). WHO guidelines indicate that concentrations greater than 25 micrograms/cubic meter are hazardous.

In the study of Zikang and colleagues(Zikang,F et. al, *Atmosphere*13:1766(2022,) PM2.5 emissions from two different diesel generators were tested. Note that the diesel generator exhaust was emitted to the surrounding air. PM2.5 concentrations were measured at 220 µg/m³ at startup and stabilized to 170µg/m³ as the generator continued running, values significantly higher than WHO recommendations.

Diesel powered public transportation vehicles are important emission sources of particulate and gaseous components of PM2.5. These toxic compounds include polyaromatic hydrocarbons, nitro-compounds (Allen et al., 1996; da Rocha et al., 2009; Bakeas et al., 2011; Cheruiyot et al., 2015), water soluble ions, metal elements, carbonyl-compound , and organic/elemental carbon.

Idling diesel powered buses and trucks can increase air pollutant concentrations in vicinity of these vehicles. The presence of school buses was positively correlated with an increase in the total particle number concentration during drop-off/pick-up hours. In addition, the number of idling buses and trucks was positively associated with black carbon levels on the street canyon near a cluster of schools (Zhang et al (*Atmos Environ*,2013,69:65)

The use of diesel buses, frequently seen idling while waiting for passengers especially in winter, presents a health risk that is due to PM 2.5 emissions. Diesel buses transporting visiting teams to UST have already been observed to idle on Goodrich Avenue. The EAW has no definite plan for managing the

diesel powered buses or diesel powered trucks. The UST arena is surrounded by residential neighborhoods and is the home of many elderly individuals with associated chronic lung diseases. The use of diesel generators and buses places these individuals at increased risk for significant health complications. Mitigation of the health risk from ultrafine particles must be addressed.

Another source of air pollution is the production of nitric oxide by vehicles traveling to and from the arena events. The EAW indicates that 1498 pre-event trips would occur and that 1581 post event trips would occur. These estimates make an unverified assumption of 2.7 passengers per vehicle. The discrepancy of 83 vehicle trips between pre and post events is not explained. The distance from, for example, from I94 to UST at Grand Avenue is approximately 1 mile. The total of 2583 pre and post event vehicle trips results in 2583 vehicle miles traveled. The EAW notes that, "vehicle GHG emissions are not reviewed or analyzed for an EAW." Modern vehicles produce approximately 0.06 gm of NOx per km mile travelled, or 0.037 gm per mile. This estimate excludes the miles traveled by automobiles, buses, and other vehicles in the search of parking and NOx produced by idling cars and buses. A meta-analysis by Ghassan and colleagues identified "consistent evidence of a relationship between NO₂, as a proxy for traffic-sourced air pollution exposure, with lung cancer." (Ghassan BH et al., Lung Cancer and Exposure to Nitrogen Dioxide and Traffic: A Systematic Review and Meta-Analysis, Environ Health Perspect, 123: 1107(2015)). For the EPA, the National Ambient Air Quality Standard (NAAQS) is: NO₂ 100ppb for 1 hour.

Section 18a of the EAW states, "This section includes an estimated quantification of the following GHG emissions associated with the proposed project:

- Carbon Dioxide (CO₂)
- [sic] Nitrous Oxide (N₂O)
- Methane (CH₄)."

Please note that nitrous oxide is commonly referred to as laughing gas and is not the pollutant of interest. The EAW then fails to analyze NOx pollution from vehicles in Tables 10, 11, or 12 or in Appendix C. The EAW is inconsistent and fails to analyze an important health care risk.

Traffic Congestion and Parking

Environmental and safety risks from traffic congestion and parking are inadequately analyzed and mitigated in the revised EAW. The EAW tabulated existing conditions at several intersections. The delay times were reported for non-event conditions. The analysis failed to include the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue. These intersections are in the area bordered by Goodrich Avenue, St. Clair Avenue, Mississippi River Boulevard, and Cretin Avenue, a neighborhood of residential homes. These streets are close to the arena site and are already used for UST soccer game parking. The EAW notes that for the Cretin Avenue/ Marshall Avenue intersection, more distant from the

arena and during non arena events, “the southbound and eastbound approaches were observed to have 95th percentile queues of 650 feet during the p.m. peak hour. In addition, the westbound approach was observed to have queues of 450 feet or greater during the p.m. peak hour.” The EAW also stated that, for the Summit Avenue at Cretin Ave and Cleveland Ave, “Due[sic] to the median width and signal limitations, there is limited storage/capability for side-street left-turn movements to enter the intersections. Of note, the westbound left-turn movement at the Summit Avenue/Cretin Avenue intersection operates at LOS F ... with 95th percentile queues of approximately 150 feet during the p.m. peak hour.” LOS F is the condition of exceeding the capacity of the roadway. The EAW noted a delay of 77 seconds with the LOS F conditions but failed to measure the duration of the queues caused by the delay. Again, the delay times were reported for non event conditions. A failure to consider the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue ignores an important safety issue. Fairmount Avenue, Princeton Avenue, and Sargent Avenue are close to the arena and would be used for the onstreet parking that the EAW reports as useable parking spaces for arena events. The serious consequence of this delay is blocked access to the neighborhood by first responders and associated emergency vehicles. This blocked access to the neighborhood is a serious safety risk and is analyzed in detail in the following discussion.

Delayed access for first responders and emergency vehicles is a consequence of the number of cars needing parking, two-sided parking, and narrowing of the streets with winter snowfall. The number of cars that will need parking accommodation can saturate the space available on adjacent neighborhood streets. In addition, cars leaving the neighborhood will experience delay, because the cars must merge with traffic flow on Cretin Avenue and will require both right and left turns to merge. The resulting delay from the queued cars waiting to exit was calculated at 41 minutes. (Please see EAW Comment Appendix). With two-sided parking in winter, and for one way traffic flow, a driving lane width of only 8.5 ft or less is available for emergency vehicle access. Fire trucks and first responder ambulances are 9-10 ft wide and require a lane wider than 10 ft when in motion. MN state fire code chapter 5 definition of a fire access road includes streets. A 20 ft minimum width for homes without sprinkler protection is required by Minnesota state fire code. The vast majority of homes in the adjacent neighborhoods are not sprinkler protected. With two-way traffic, and cars queued to exit in both directions, no adequate access lane will exist for fire trucks will be available, and the lane will be too narrow for ambulances.

Why will this situation occur?

The UST plan states, “the other nonresident parking lots and on-street parking (no permits required) were expected to accommodate the displaced vehicles.” The 2024 EAW then contradicts itself and states, “Since on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum, the review was focused on the visitor parking facilities”, and on page 14 of appendix D, lists 369 adjacent on street parking spaces as available and are included in the analysis. The closest on campus parking facility to the arena is the Anderson parking ramp, which can accommodate approximately 750 vehicles. While a UST spokesperson stated in the EQ Monitor that events having

5500 attendees will occur 35 times a year, Table 14, page 57 of the EAW tabulates a total of only 2 games at or near arena capacity. Table 5 page 16 appendix D indicates that only 2 games will be at maximum arena capacity, while on page 12, the EAW contradicts itself and states that 6-9 maximum attendance games are anticipated. Why is an estimate of attendance for concerts, conferences, and other events not included? Clearly, the estimated attendance for the sporting events is arbitrary, the attendance for other arena events is absent, and attendance numbers are underestimated. A responsible assessment would plan for maximum attendance. For an event of 5500 attendees, the UST estimate of 22% of attendees arriving by non-private motor vehicle, and 2.7 passengers per private vehicle, 1588 cars will require parking accommodation. In the absence of a law requiring 2.7 passengers per vehicle, the number of passengers per car is likely to be less. During the women's soccer game on 8/25/2024, 33 cars were parked on Woodlawn Avenue from Goodrich Avenue to Princeton Avenue when on campus parking was available. Observation demonstrated that only 1 or 2 passengers occupied the vehicles. For the FHA value of 1.7 passengers per vehicle, 2523 cars will need parking. The EAW identifies 1084 on campus parking spaces. Many of these planned parking spaces are distant from the arena site. Even assuming attendees will park in these facilities and walk in the cold of winter, 504 to 1439 cars will need parking accommodation off campus. The EAW makes the incomprehensible statement that "it is generally good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional five (5) to 15 percent. This extra supply reduces the unnecessary circulation of vehicles looking for parking and the perception of inadequate parking." While this statement holds true during daily non-event conditions, it does not apply to event conditions". This statement is not a technical clarification. It demonstrates lack of accountability and responsibility. Why can UST arbitrarily suspend good management practices and substitute practices that jeopardize health and safety of neighboring residents?

Where will the cars park?

People will choose to park as close to the arena as possible, even if more distant off-street parking is available. This assumption is reasonable, given that hockey and basketball are primarily winter sports, and arena attendees will likely choose to walk no further than necessary in the cold and snow. The UST website states that no free parking is available on campus. Free city street parking will likely be preferred. Evidence for this argument already exists. UST students and staff park on the north side of Goodrich Avenue, a street adjacent to the UST campus, even though more distant on campus parking is available. Again, the women's soccer game on 8/25/2024 with many fewer attendees than would be attending an arena event provides further evidence. During the soccer game, 33 cars were parked on Woodlawn Avenue from Goodrich Avenue to Princeton Avenue. Observation identified only 1 or 2 passengers per vehicle. On the north side of Goodrich Avenue 51 cars were parked. On the south side of Goodrich Avenue, a restricted parking zone requiring a permit at all times, five cars were illegally parked. Sufficient on campus parking was available, but free on street parking apparently was preferred. When school is in session, the north side of Goodrich Avenue has average of 56 cars from Mississippi River Boulevard to Cretin Avenue. This number of parked cars saturates the street on a daily basis when school is in session.

What streets will be used?

For further analysis, consider the neighborhood bordered by Goodrich Avenue, Princeton Avenue, Mississippi River Boulevard, and Cretin Avenue. It is adjacent to the south campus and is one of the neighborhoods that will be used for free on street parking. Making the reasonable assumption that cars will park at the same density as UST students and staff parking on the north side of Goodrich Avenue, we used this average number of cars divided by the length of the street from Mississippi River Boulevard to Cretin Avenue to calculate the number of cars that can be accommodated in this neighborhood. Over 300 cars can park on these streets. Clearly, 505 to 1439 cars are enough to saturate this neighborhood.

Why is the saturation of the adjacent neighborhood a safety problem?

Access of emergency vehicles will be blocked. This conclusion was reached by measuring the width of the streets with two-sided parking on 3/26/2024 following a snowfall. A typical width of a parked car is 5 feet. The street width measurement did not include the width of parked pick-up trucks. For example, a Ford F-150, excluding extended side mirrors, has width of 6 feet 6 inches. With two-sided parking and one way traffic, the street width was measured at 8 feet 5 inches. First responder emergency vehicles are 9 -10 ft wide and require a lane wider than 10 ft when in motion. MN fire code requires access road width of 20 ft for non sprinkler protected homes.

How long will the clogged streets persist?

As noted above, The EAW tabulated existing conditions at several intersections. The delay times were reported for non event conditions. The analysis failed to include the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue. As At LOS F, the volume of cars exceeds capacity of the street. LOS F was identified at peak hour traffic under non event conditions, and a 77 second delay was measured in the limited analysis. The EAW 2023 states that, with events, "multiple unsignalized side street approaches on Cretin Avenue will be difficult to make left turn movements for 15 to 30 minutes". Although this statement does not appear in the revised EAW, the same conditions exist. To analyze the consequences of this recognized delay further, consider, as an example, Fairmount Avenue, from Woodlawn Avenue to Cretin Avenue. This section of Fairmount Avenue is merely one block from the south campus and is a likely choice for parking. With two-sided parking, 84 cars can be accommodated in this portion of Fairmount Avenue. Cretin Avenue is the likely choice of exit from this street. Exiting on Cretin Avenue requires both right and left turns. Exit time to Cretin Avenue from Fairmount Avenue was measured at 2-minute intervals from 4:36 PM to 5:30 PM on 4/9/2024 without a special event in progress. Average delay for cars to enter the traffic flow on Cretin Avenue was 41.4 seconds. Exit time for cars that queue at the exit to Cretin Avenue was modeled using the method of Mao et. al. (Mao, X et al., Optimal Evacuation Strategy for Parking Lots Considering the Dynamic Background Traffic Flows, Intl J Environ Res and Public Health, 2019,16:2194) Their model assumes no left turn, no non-motorized or

pedestrian traffic, and exit of only one car at a time. Their published numerical simulation for two exits onto a street with background traffic flow that reasonably approximates the conditions of Fairmount Avenue exiting to Cretin Avenue demonstrated delays of 17 minutes and 28 minutes, respectively. Using their model, and again assuming one way traffic and no non-motorized traffic, queue clearing time from Fairmount Avenue to Cretin Avenue was calculated at 41 minutes. During this interval, a lane of only 8.5 ft width will be available for emergency vehicles, if traffic is only one way. During the winter snow season, residential streets with 2-sided parking, two way traffic, and cars queued to exit in both directions, will be clogged. No driving lane will be available for emergency vehicles. With two-way traffic and thousands of pedestrians converging on the neighborhood with an arena event, the delay time is likely to be increased. The EAW 2023 mitigation is, "Communication should be made to area residents and other sources of commuter traffic so they are aware of potential traffic ...". This thoughtless statement would require neighborhood residents to schedule heart attacks, strokes, or other emergencies around the basketball and hockey schedule. This recommendation continues in the vague and arbitrary mitigation procedures noted by the court of appeals and does not responsibly address mitigation.

UST Multipurpose Arena EAW Transportation Analysis September 23, 2024 2024 EAW Transportation Analysis Update Addendum , figure 5 and 6 state that , "With mitigation, congestion/ queuing is expected to occur for 20 to 30 minutes prior to the event" and that, "With mitigation it is expected to take approximately 20 to 35 min to clear the Anderson Parking Facility (APF). The study area is expected to be cleared shortly after the APF". This amount of delay places residents of the adjacent neighborhoods at risk. American Heart Association guidelines state that for, heart attack, door to treatment time goal is less than 30 minutes. For stroke, door to treatment time goal is less than 60 minutes. These guidelines will be impossible to meet under these conditions. Delay causes irreversible loss of heart tissue, irreversible loss of brain tissue, and increased risk of death. The obstruction of emergency vehicle access to the neighborhood as a result of the arena events risks the lives, health, and safety of neighborhood residents. Please note that the Environmental Assessment Worksheet (EAW) identified 1 death and 3 serious crashes without an arena event. The EAW specifies that adjacent on street parking will be used. Adjacent neighborhood streets are considered to be a UST parking lot, although these streets do not have the capacity for the parking demand and will not allow emergency vehicle access during arena events. Even shopping malls have emergency vehicle access.

The residents of St. Paul can reasonably demand that the City of St. Paul government protect the lives, health, and safety of its residents. The traffic analysis in the EAW fails to address the safety consequences of the increased traffic and congestion. A project that generates 250 or more trips at peak hours or 2500 or more daily trips are criteria of the Minnesota Department of Transportation for implementation of a Traffic Impact Study. The current EAW states that 2853 trips are expected to occur at arena events. In the section of Cumulative Potential Effects, the EAW arbitrarily defines the "geographic areas considered for cumulative potential effects are those near the project site (within approximately one-half mile)". What law limits the cumulative effects distance to one half mile? The Highland Bridge development will increase traffic on Cretin Avenue and is a mere 1.4 miles from UST. The EAW fails to consider the Highland Bridge project. The current traffic analysis in the EAW is inadequate. A responsible Traffic Impact Study is necessary.

Recommended parking mitigation

The revised EAW proposes parking mitigation procedures. These proposals include:

1. Provide Communication on Alternative Transportation Options with Online Ticket Sales. Comment: Use of alternative transportation is voluntary and not enforceable.
2. Implement Pre-paid Online Event Parking Assignment Assigned Parking . Comment: Purchase of pre paid parking is voluntary and not enforceable.
3. Resident Parking Permits to Increase Visitor Parking (Morrison L2). Comment: This recommendation needs further definition.
4. Continue Use of Pre-paid Online Event Tickets. Comment: Pre paid online event parking tickets are voluntary and not enforceable.
5. Clear Parking Ramps (APF, ASC, McNeely, Frey, Morrison L2) Prior to Game. Comment: Where do these cars that are displaced from these parking facilities go when the ramps are cleared?
6. Provide Advanced Notice, Online Classes, and other Strategies with Parking Ramp Clearing. Comment: How will this information be provided and enforced?
7. Free Transit Pass Option with Purchase of Ticket. Comment: Use of public transit is voluntary and not enforceable.
8. Discounted Rideshare Reduces Parking Demand. Comment: How will this strategy be implemented?
9. Restaurant/Bar Shuttle Services. Comment: What restaurants are considered and how will this strategy be implemented?
10. Other events on campus will not be scheduled. Comment: How will this strategy be enforced?
11. Provide Off-Site Parking and Shuttle Services. Comment: Use of shuttle service will be voluntary and not enforceable.
12. Traffic Control Officers along Cretin Avenue Traffic/Pedestrian Operations & Safety Event Signal Timing Plans at Strategic Intersections. Comment: Will the tax payers of St. Paul be responsible for subsidizing the payment to traffic control officers and upgrading traffic signals?

As noted in the court of appeals decision, caselaw ... recognized as mitigation measures [sic] include an enforcement mechanism. The enforcement mechanism for the proposed mitigation measures are absent.

Members of the City of St. Paul government take an oath of office that states they will uphold the constitution of the state of Minnesota. Article I Section I states "Government is instituted for the security, benefit and protection of the people..."

Approval of the UST arena in an environmentally sensitive location that does not have the necessary infrastructure risks the environment, health, and safety of residents in the adjacent neighborhood. The plan for the UST multipurpose arena in the revised EAW does not meet the constitutional requirement to provide security, benefit, and protection. An EIS is mandatory.

Jerome H. Abrams

151 Woodlawn Avenue

St. Paul, MN 55105

EAW Comment Appendix

Calculation of delay in exit of parked cars

The issue is the delay that will occur when the arena event concludes, the attendees attempt to leave the streets where their cars are parked, and a neighborhood resident has an emergency. Again, we use Fairmount Avenue as an example. The argument will apply to other neighborhood streets. The model employed is that used by Mao et. al. (Mao, X et al., Optimal Evacuation Strategy for Parking Lots Considering the Dynamic Background Traffic Flows, Intl J Environ Res and Public Health, 2019,16:2194) The model assumes no left turn, no non-motorized or pedestrian traffic, and one car can exit at a time.

Let Q_r = the background traffic flow. Please see appendix for determination of Q_r

τ_r = minimum time for background traffic to allow exiting vehicle to merge into background traffic. Please see appendix for determination of τ_r

T_r = average time for two consecutive intervals for car to exit.

μ_r = average time of arrival in queue. Please see appendix for determination of μ_r .

$$T_r = 1 / (Q_r \cdot \exp(-Q_r \cdot \tau_r)) - 1 / Q_r - \tau_r. \quad T_r = 6.05 \text{ minutes.}$$

Since the vehicle at the front of the queue can only leave and merge in to the background traffic flow when vehicle headway is greater than the minimum time for background traffic to allow vehicle to exit into background traffic flow, the average time between the intervals is the service time of queueing system.

Let d_r = average queueing time per car.

$$d_r = T_r / (\mu_r \cdot T_r - 1) = 41 \text{ minutes.}$$

Numerical simulation, by Mao and colleagues, of evacuation of a parking lot with two exits similar to the exits from the neighborhood streets to Cretin Avenue had average queueing times of 17 minutes and 28 minutes. The simulation assumed no left turns, background traffic flow, and no non-motorized traffic. (Mao et al, op. cit.). With left turns and two way traffic, delays in excess of 28 minutes are reasonable.

COMMENT ON 2023 EAW AND 2024 UPDATE



TO: City of St. Paul Department of Planning and Economic Development
FROM: Advocates for Responsible Development,
info@advocates4rd.org
RE: Environmental Assessment Worksheet for University of St. Thomas Multipurpose Arena at 2260 Summit Avenue
Date: November 7, 2024

Advocates for Responsible Development (ARD)¹ is submitting this comment to the 2024 Update (“Update”) to the 2023 Environmental Assessment Worksheet (“EAW”) regarding a multipurpose arena proposed by the University of St. Thomas (“UST”). The Update includes three projects that were not included in the EAW: Schoenecker Center for Science, Technology, Engineering, Arts, and Mathematics (“Schoenecker”), an addition to the Frey Center for UST’s Center for Microgrid Research (“Microgrid Addition”), and a parking lot that the Saint Paul Seminary (“SPS”) has proposed on land that it owns (“SPS Parking Lot”). All of these projects sit on the large block bounded by Summit Avenue, Cretin Avenue, Goodrich Avenue, and the Mississippi River Boulevard (“Block”). A majority of the Block was transferred by SPS to UST in 1987 and constitutes UST’s “South Campus.”

FACTS

This Comment to the EAW and Update relies on the facts stated below:

1. South Campus Setting: Until 1987, the South Campus was owned by the St. Paul Seminary (which continues to own and occupy the northwest corner of its former campus). The South Campus lies on the bluff above the Mississippi River, which from there flows through St. Paul on its way to the Gulf of Mexico. The western border of the Block is the Mississippi River Boulevard, which the City has designated as parkway with certain environmental protections. West of the Mississippi River Boulevard is the Mississippi River Gorge Regional Park and the Mississippi River. To the north of the Block is Summit Avenue, another City-designated parkway, and a residential community that extends northward. Mississippi River Boulevard and Summit Avenue are two of the Twin Cities’ busiest routes for bicycles and pedestrians. The east side of the Block is Cretin Avenue, a two-lane road that widens to four lanes as it travels north past Grand Avenue. Goodrich Avenue is a residential street that forms the Block’s southern border.
2. The only retail businesses within 1/2 mile of the South Campus are a restaurant (Davanni’s), an auto repair shop, and a Speedway gas station/convenience store. Except for some apartment buildings on Grand Avenue, almost all of the buildings within 3/4 mile of UST and SPS are single family homes and duplexes.
3. Arena Proposal: The EAW discloses that the arena’s main hall can seat up to 6,000 attendees. However:

¹ Advocates for Responsible Development is a 501(c)(3) nonprofit organization that was formed in October 2023 after UST announced its plans to build an arena on the South Campus. ARD currently has 280 members, including UST students and faculty members.

- a. The EAW does not disclose how many non-seated (standing room) attendees may be accommodated within the main hall.
 - b. The EAW does not disclose how many participants and auxiliary staff (teams, referees and scoring officials), trainers, security, box office and ticket takers) would be in the arena during sporting events.
 - c. The EAW does not disclose how many food and beverage staff would be present, and what their parking needs are, or how they would arrive at and leave the event.
 - d. The EAW does not disclose how many other users of the arena building there may be. The building has two basketball courts, one additional hockey rink with seating, training facilities, coaches' offices, and a fitness center.
 - e. The EAW does not disclose the capacity of the performance hall in Brady Education Center, other than to say it is larger than the 195-seat performance hall in Schoenecker.
 - f. The EAW does not disclose the capacity of the reception hall in Anderson Student Center, which utilizes Anderson Parking Facility adjacent to the arena site.
4. The EAW does not include or refer to any limits on UST's use of the arena, and none are contained in the Conditional Use Permit ("CUP") enacted by the City of St. Paul ("City").
 5. While the EAW focused on using the arena for UST's basketball and hockey teams, the Update states that UST will lease the arena to other users for sports tournaments, high school commencements, concerts, conventions, and other events.
 6. The Update has been published as a result of a decision by the Minnesota Court of Appeals in the case of Advocates for Responsible Development v. City of St. Paul and University of St. Thomas, court file A23-1656. That case was ARD's certiorari appeal of the City's "Negative Declaration" on October 2, 2023 that accepted the EAW and declared that no Environmental Impact Statement ("EIS") would be required. The Court issued an Opinion on July 8, 2024 ("Opinion") rejecting the Negative Determination and remanding to the City for issuance of a new EAW. Specifically, the Court found that the scope of the EAW was improperly narrowed to just the arena and did not include other elements of UST's ongoing development of its South Campus. The Court also determined that the EAW's analysis of the arena's environmental impacts was flawed, and that the mitigation measures included in the Negative Determination did not meet the legal requirement that mitigation measures be "specific, targeted, and certain." The Opinion is now final and cannot be appealed further; on October 15, 2024, the Minnesota Supreme Court denied UST's petition for review.
 7. While the Court of Appeals was considering ARD's certiorari appeal, UST applied for and the City granted approval of a site plan for the arena. Because the site plan was based on the 2023 EAW and the Negative Declaration, that site plan is no longer valid. UST would have to apply for a new site plan if environmental review is successfully completed.
 8. UST commenced construction of the arena in April 2024. At the time this Comment is being submitted, construction continues without any approved environmental review.
 9. In October 2024, ARD filed a lawsuit in Ramsey County District Court, court file 62-CV-24-6516, to enjoin continuation of construction and seek other relief related to UST's development of the South Campus.

Forward: There are no limits on UST’s use of the arena

UST has not proposed any limits on its use of the arena, and none are contained with its Conditional Use Permit (“CUP”) enacted by the City of St. Paul (“City”). It should therefore be assumed that UST will utilize the arena at its maximum capacity throughout the year, without limiting any analysis to a few sports or even the university’s own capacity for using the building; the EAW’s analysis of environmental effects must assume that the arena’s utilization will be to the full maximum limit, and must determine what that limit is. UST has not provided that information, so it is not included in the EAW or the Update. Because UST has not provided the factual information necessary for a determination of the Arena’s full capacity, the City may not accept the EAW and must require an EIS.

COMMENTS

1. THE EAW AND UPDATE SHOULD NOT BE ACCEPTED BECAUSE THEY ARE INCONSISTENT WITH APPLICABLE ZONING RESTRICTIONS.

At almost 75 feet tall, the arena would be the tallest building on the South Campus. However, the applicable zoning regulations limit the height of new construction and do not permit newly constructed buildings to be as tall as the planned arena. This creates obvious zoning issues, but it presents environmental issues as well. Because the arena building would be taller than permitted by zoning regulations, the City may not accept the EAW or Update.

Below are some facts specific to this issue:

1. The City regulates zoning for the South Campus through four regulatory frameworks: zoning districts, development standards, overlay districts, and conditional use permits.
2. There are no zoning variances in place that are relevant to this action.
3. The South Campus lies within the H1 and H2 residential zoning districts in the City of St. Paul. Only a small part of the South Campus lies within the H1 zoning district, but that part is within the site of the Arena.
4. In the H1 zoning district, the following limitations on new construction apply:
 - a. Maximum building height: 35 feet. L.C. § 66.231.
 - b. Minimum building setback from side lot: 5 feet. *Id.*
5. In the H2 zoning district, the following limitations on new construction apply:
 - a. Maximum building height: 39 feet. *Id.*
 - b. Minimum building setback from side lot: 5 feet. *Id.*
6. St. Paul’s Legislative Code includes development standards that apply to specific types of development. The development standards that apply to “college, university, seminary, or similar institution of higher learning” are contained in L.C. §65.220. The relevant provisions apply to the South Campus:
 - a. Maximum building height: 90 feet. L.C. § 65.220(c).
 - b. Minimum building setback from all lot lines: 50 feet, plus an additional two (2) feet for every foot the building’s height exceeds fifty (50) feet.” L.C. § 65.220(b).
7. In 1991, the State Legislature established the Mississippi River Corridor Critical Area (“MRCCA”) to “protect and preserve the Mississippi River and adjacent lands that the legislature finds to be unique and valuable state and regional resources for the benefit of

- the health, safety, and welfare of the citizens of the state, region, and nation” (among other stated reasons). Minn. Stat. § 116G.15. The creation of the MRCCA led to related regulatory provisions, including Chapter 68 of the St. Paul Legislative Code.
8. Chapter 68 created overlay districts in areas to which the MRCCA applies. The entirety of the South Campus lies in the RC3 River Corridor Urban Open Overlay District. In the RC3 Overlay District, the following limitations on new construction apply:
 - a. Maximum building height: 40 feet. L.C. § 68.233.
 - b. Minimum building setback from side lot: 5 feet from the Seminary. *Id.*
 9. Conditional uses may exist within the MRCCA. “Conditional uses are those specified by the corresponding underlying district as established in section 60.303 to the extent that they are not prohibited by any other provision of the zoning code. They are subject to standards specified in the corresponding underlying district section and to those specified in sections 68.233 and 68.400 et seq.” L.C. § 68.234.
 10. The South Campus is subject to a conditional use permit (CUP). The most recent amendment of the CUP was approved in 2004. The following limits are stated in the CUP:
 - a. Maximum building height: 75 feet in the middle of the South Campus, 60 feet on the north and most of the east side, and 30 feet on the west, south, and part of the east side.
 - b. Minimum building setback from side lot: 0 feet.
 11. The Update states that the arena would be approximately 74 feet, eight inches tall.
 12. The Arena would be set back from its lot line with the Seminary by approximately 35 feet, but in any case less than 50 feet plus two feet for every foot that the Arena’s height exceeds 50 feet.
 13. The most restrictive regulations from each of these frameworks applies to limit development on the South Campus. For example, if each contains a limitation on building height, the lowest of the building heights applies to the South Campus. Of the four above-stated regulatory frameworks, the most restrictive are:
 - a. Maximum building height: 35 feet in H1, 39 feet in H2 zoning districts.
 - b. Minimum setback from lot line: 50 feet, plus an additional two (2) feet for every foot the building’s height exceeds fifty (50) feet.” L.C. § 65.220(b) (development standard).

The EAW states that the City’s position is that maximum heights contained in a CUP, even in the presence of more restrictive limits in the zoning code, “are controlling for purposes of height regulation per a long-standing City interpretation.” EAW at 15. This is evidently why the City approved the construction of Schoenecker and other buildings on the South Campus that exceed the 39-foot limit in the H2 zoning district. But that interpretation would contradict state statutes and would contradict the City’s own practice on issues other than height. This interpretation appears not to have been challenged before.

The power to regulate zoning is derived from state statutes, as municipalities are state agencies. Minn. Stat. 462.357, subd. 1 grants municipalities the authority for zoning regulations:

For the purpose of promoting the public health, safety, morals, and general welfare, a municipality may by ordinance regulate on the earth’s surface, in the air space above the surface, and in subsurface areas, the location, height, width, bulk, type of foundation,

number of stories, size of buildings and other structures, the percentage of lot which may be occupied, the size of yards and other open spaces, the density and distribution of population, the uses of buildings and structures for trade, industry, residence, recreation, public activities, or other purposes, and the uses of land for trade, industry, residence, recreation, agriculture, forestry, soil conservation, water supply conservation, conservation of shorelands, as defined in sections 103F.201 to 103F.221, access to direct sunlight for solar energy systems as defined in section 216C.06, flood control or other purposes, and may establish standards and procedures regulating such uses.

Pursuant to Minn. Stat. 462.357, subd. 6(2), the state also granted municipalities the authority to grant variances from their zoning regulations:

Appeals and adjustments. Appeals to the board of appeals and adjustments may be taken by any affected person upon compliance with any reasonable conditions imposed by the zoning ordinance. The board of appeals and adjustments has the following powers with respect to the zoning ordinance:

....

(2) To hear requests for variances from the requirements of the zoning ordinance including restrictions placed on nonconformities. Variances shall only be permitted when they are in harmony with the general purposes and intent of the ordinance and when the variances are consistent with the comprehensive plan. Variances may be granted when the applicant for the variance establishes that there are practical difficulties in complying with the zoning ordinance. "Practical difficulties," as used in connection with the granting of a variance, means that the property owner proposes to use the property in a reasonable manner not permitted by the zoning ordinance; the plight of the landowner is due to circumstances unique to the property not created by the landowner; and the variance, if granted, will not alter the essential character of the locality. Economic considerations alone do not constitute practical difficulties.

Municipalities are also allowed to issue conditional use permits, but only where the use meets the "standards and criteria" in the zoning ordinance. Minn. Stat. § 462.3595, subd. 1 provides:

The governing body may by ordinance designate certain types of developments, including planned unit developments, and certain land development activities as conditional uses under zoning regulations. Conditional uses may be approved by the governing body or other designated authority by a showing by the applicant that the standards and criteria stated in the ordinance will be satisfied. The standards and criteria shall include both general requirements for all conditional uses, and insofar as practicable, requirements specific to each designated conditional use.

The state statutes, therefore, allow St. Paul to enact zoning regulations, expand those regulations in specific circumstances by issuing a variance, and place additional limitations on certain uses by issuing a conditional use permit. Consistent with state statutes, the City enacted zoning provisions to grant variances using the same standards as state law. Leg. Code. § 61.601 ("The board of zoning appeals and the planning commission shall have the power to grant variances from the strict enforcement of the provisions of this code.").

The difference between variances and conditional use permits are obvious from the above-quoted statutes. The standard for variances is much higher; the applicant must show that "there are practical difficulties in complying with the zoning ordinance." The term "practical difficulties"

is narrowly defined so that the property owner will use the property in a reasonable manner, the difficulties are created by the property and not by the owner, and variance will not alter the essential character of the locality. Importantly, “economic considerations alone do not constitute practical difficulties.”

Conditional use permits do not carry such requirements because they do not seek to alter the underlying zoning ordinances. Rather, a prerequisite is showing that “the standards and criteria stated in the ordinance will be satisfied.”

Except for the very specific interpretation pertaining to the height of UST's buildings, the City's practice seems to conform to state law. The City would not permit one neighbor to build a garage that is taller or closer to the lot line than permitted by the zoning ordinance without obtaining a variance; a conditional use permit would not allow the deviation from the otherwise applicable setback requirement. The EAW, however, asserts that it is “long-standing City interpretation” that UST's CUP may be considered to grant a variance for height. It is objectively true that the City has approved other buildings at UST exceeding the H2 height maximum. One might think that these approvals were the result of a failure by neighbors or the City to notice that the zoning code contains lower maximum building heights, but in this case at least one comment in 2023 to the EAW noted the lower height limit. The City's response to that comment was that “As noted in the EAW, the City of Saint Paul regulates building height on the University of St. Thomas South Campus via a previously approved Conditional Use Permit (CUP).” Negative Declaration, Response to Public Comments of Tom and Karen Alf, at 8. So it appears that the City does, in fact, ignore the zoning ordinance if it conflicts with a CUP. The important question, however, is whether the City is acting within state law by exalting a CUP over the limitations in the zoning code. There is no provision of law that provides a CUP with the ability to override a zoning requirement. The definitive answer is that a variance is needed to vary the zoning code.

It is undisputed that no variance has been granted for this project. Indeed, the arena would not qualify for a variance because there is nothing about the property that created any hardship for UST; it simply wants to build an arena that is taller than the 39-foot maximum in the H2 zoning district.

UST's ongoing insistence that its site plan is consistent with the height limits in the CUP is therefore irrelevant. It is also not true when the CUP's reasoning is concerned. “[A]ssuming St. Thomas builds facilities at the square footage it requires on the Seminary campus, a 40 foot height restriction would force new buildings to occupy a larger footprint than a building of the same square footage at a taller height. Higher building height limits will encourage the preservation of more green space on the campus.” Recommendations of the College Zoning Committee of the St. Paul Planning Commission, August 1988, at 8. UST wants to build a sprawling arena complex that could about fit all of the remaining South Campus buildings within its footprint, hardscaping 5.97 acres of its 6-acre site. But the arena would also be twice as tall as the 40-foot height limit applicable in the RC3 zoning district. The arena preserves no green space but is also almost twice as tall as the 40-foot limit in the MRCCA. The arena is inconsistent with the CUP.

The reasoning relating to building height also applies to setbacks. The arena would be about 35 feet from the SPS property line, while the zoning code would require “50 feet, plus an additional two (2) feet for every foot the building’s height exceeds fifty (50) feet.” A 75-foot-tall arena would require a 100-foot setback; a 39-foot-tall arena would require a 50-foot setback. The current plan of 35 feet would violate both of those requirements. UST's CUP states that a setback of zero (0) feet is required, but again the CUP is not a variance. Because no variance to the zoning ordinance has been granted, the zoning ordinance applies and requires a larger setback than planned for the arena.

The arena’s excessive height and insufficient setback both violate the applicable zoning regulations. The City cannot approve any plan of any kind that does not conform to its zoning regulations.

As a matter of the environmental review, the height and setback raise a variety of environmental concerns ranging from the proximity to the Mississippi River bluff, the effect of the arena’s shadow on the wildlife that live adjacent to the arena in the part of the bluff known as “the Grotto,” and the effect of a tall building with massive plate glass windows on bird species, both local and those migrating along the Mississippi River. These effects will be discussed in later sections of this document, but they all stem from the fact that the arena does not comply with applicable zoning regulations. The City could require an EIS to study these effects more closely, but at some point the City must deny this project because it violates the zoning code.

2. THE EAW AND UPDATE SHOULD NOT BE ACCEPTED BECAUSE THEY ARE INCONSISTENT WITH UST’S 2004 SPECIAL CONDITIONAL USE PERMIT.

The first bullet point of the City’s Site Plan Approval Letter of April 4, 2024 states, “ The development is subject to the existing Campus SCUP including maximum heights and minimum setbacks.” By this reference, the Approval Letter incorporates paragraph 16 of the 2004 St. Thomas University Special Conditional Use Permit (“SCUP”), which provides:

Goodrich Avenue Access. At such time as the University remodels or replaces the Binz Refectory or replaces Grace Hall, the loading drive which currently exists between Goodrich Ave. and the Binz refectory shall be removed, such that there shall be no vehicular access from Goodrich Ave. to any of the University’s buildings on the south campus.

St. Thomas substantially remodeled the basement and first floor of the Binz Refectory in 2022-23, yet has not removed the drive from Goodrich Avenue to the Binz Refectory as required. UST is therefore in violation of the SCUP.

The Binz Refectory is a dining hall that was constructed in 1978 by the Saint Paul Seminary. After the 2020-21 academic year, St. Thomas stopped preparing meals in the Binz Refectory.

In the summer of 2022, St. Thomas’s contractor Ryan Companies obtained Permit No. 20 22 074023 from the City to “**Remodel** a Portion of the Binz Building to Accommodate Athletic Offices, Team Rooms, and Addition of Unisex Restrooms” (emphasis added). By that point, St.

Thomas was no longer referring to it as a “refectory” and was calling it the “Binz Building.” According to the permit application, the remodeling work was to start by July 11, 2022 and end by September 9, 2022. The construction plans show that much of the first floor would be remodeled into offices for coaches, an office, lounge, and conference room, team meeting room, and bathrooms. The estimated value of the remodel would be \$795,000, plus electrical work of \$100,000 and other add-ons that brought the total 2022 remodel cost to \$937,000.

Shortly thereafter in December of 2022, a different UST contractor obtained Permit No. 20 23 104295 to “install a new exhaust fan” and “supply ductwork to accommodate new spaces” in the Binz Building. The work was to begin in December 2022 and be completed in January 2023. The value of the work was listed as \$85,000. Ryan Companies also obtained permit 20 23 103724 for \$250,000 in basement work to “remodel lower level.” Construction drawings show that the entirety of the basement except utility rooms was remodeled to locker rooms for men’s and women’s soccer, softball, a visiting locker room, official’s room, and related athletic spaces. With associated electrical work, the total 2023 remodel cost was \$356,500.

Year	Permit #	Contractor	Work
2022	20 22 085078	Collins Electrical	<ul style="list-style-type: none"> • Fire Alarm System Remodel Binz Refectory • Partial Floor Remodel in The Binz Building On The South Campus At Ust (no stated value)
2022	20 22 088212	Total Mechanical	<ul style="list-style-type: none"> • Commercial Alter (\$22,000 value)
2022	20 22 082764	Collins Electrical	<ul style="list-style-type: none"> • Binz Athletics Remodel (\$100,000 value)
2022	20 22 066784	Ryan Companies	<ul style="list-style-type: none"> • Remodel of a portion of the Binz Building to accommodate athletic offices, team rooms and addition of unisex bathrooms (\$20,000 value)
2022	20 22 074023	Ryan Companies	<ul style="list-style-type: none"> • Remodel of a portion of the Binz Building to accommodate athletic offices, team rooms and addition of unisex bathrooms (\$795,000 value)
2023	20 23 103724	Ryan Companies	<ul style="list-style-type: none"> • Remodel lower level into dry locker rooms and laundry closet (\$250,000)
2023	20 23 107519	Horwitz LLC	<ul style="list-style-type: none"> • Re-routing existing steam lines and connecting to existing systems (St Thomas Bldgs: FDD, Grace, Binz, Brady, Cretin). (\$1,046,033 value)
2023	20 23 104416	Horwitz LLC	<ul style="list-style-type: none"> • UST Binz hall. Installing 1 floor sink. (\$3,500 value)

2023	20 23 104295	Horwitz LLC	• Binz hall. Altering existing supply ductwork to accommodate new spaces. Installing a new exhaust fan and associated ductwork. All work is being done on the basement level space. (\$85,000 value)
2023	20 23 109872	Collins Electrical	• Commercial Repair / Alter (\$9,000 value)
2023	20 23 109877	Collins Electrical	• Installation of horn/strobes & module for fire alarm at UST Binz (\$9,000 value)

As part of its remodeling of the Binz Building, St. Thomas was required to remove the drive from Goodrich Avenue to be in compliance with the SCUP. That remodeling work was completed by January 2023, yet the drive remains in place more than one year later.

On July 1, 2024, Matthew Graybar of the St. Paul Department of Safety and Inspections wrote UST's general counsel to obtain compliance with the CUP, stating, "[Y]ou are hereby ordered to bring this property into compliance with the approved CUP by removing the loading drive between Goodrich Ave. and the Binz Refectory by July 31st, 2024." It is an objective fact that UST has not removed the loading drive.

The site plan contained in the Update shows the planned continued existence of the loading drive to Binz Refectory. Notably, the site plan does not contain any alternative access to the Binz Refectory that could be used if the existing service drive is removed. Because the project site described in the Update includes the entire Block, the entire Block must conform to the zoning

code to be approved. The Binz loading drive is one example where the Block does not conform, and the City therefore cannot accept this EAW.



Fig. 1. Overview of drive from Goodrich Avenue to the Binz Building. (Source: Google maps, with three labels added for orientation)

3. THE SITE PLAN MUST BE REJECTED BECAUSE IT INCLUDES DEVELOPMENT WITHIN THE SETBACK AREA FROM THE MISSISSIPPI RIVER BLUFF, WHICH IS STRICTLY PROHIBITED.

Congress established the Mississippi National River and Recreation Area (“MNRRA”) which protects the 72 miles of the river and riparian lands in Minneapolis, St. Paul, and the seven-county metropolitan area. The purpose of passing the MNRRA was “to protect, preserve, and enhance the significant values of the waters and land of the Mississippi Corridor within the Saint Paul-Minneapolis Metropolitan Area.” See 16 U.S.C. § 460zz(a)-(b). The federal government also established a Comprehensive Management Plan for development within the MNRRA. The Comprehensive Management Plan (at p.18) requires preservation of “the bluff impact area (40

feet back from the bluff line) in a natural state or restore natural vegetation.” Following passage of federal law, the Minnesota Legislature established the Mississippi River Corridor Critical Area (“MRCCA”), which is co-extensive with the MNRRA. The purpose of the MRCCA Act was to “protect and preserve the Mississippi River and adjacent lands,” “prevent and mitigate irreversible damages,” “preserve and enhance the natural, aesthetic, cultural, and historical values,” “protect and preserve the Mississippi River,” and “protect and preserve the biological and ecological functions of the Mississippi River corridor.” Minn. Stat. § 116G.15. The MRCCA Act authorized the Minnesota Department of Natural Resources (“DNR”) to develop and adopt rules and oversee the administration of the MRCCA. The DNR did so in Minnesota Rules Chapter 6106, and St. Paul is required to adopt an MRCCA ordinance.

The policy of the MRCCA Rules is to preserve the Mississippi River corridor and to “protect its environmentally sensitive areas.” Minn. R. 6106.0010. In its Statement of Need and Reasonableness (SONAR) establishing the MRCCA Rules, the DNR was explicit: “Protection of bluffs in the MRCCA was a major focus of this rulemaking.” SONAR at 22. The MRCCA Rules also define “primary conservation areas” to be protected by the MRCCA Rules as “key resources and features.” Minn. R. 6106.0050, Subp. 53. The primary conservation areas include bluff impact zones, gorges, and natural drainage routes. *Id.*

The MRCCA rules provide that no development (including impervious surfaces) may exist within 40 feet of the bluffline. St. Paul Leg. Code § 68.402(b)(4) contains the same restriction. The definition of a bluffline is graphically illustrated in the City’s publication *Mississippi River*

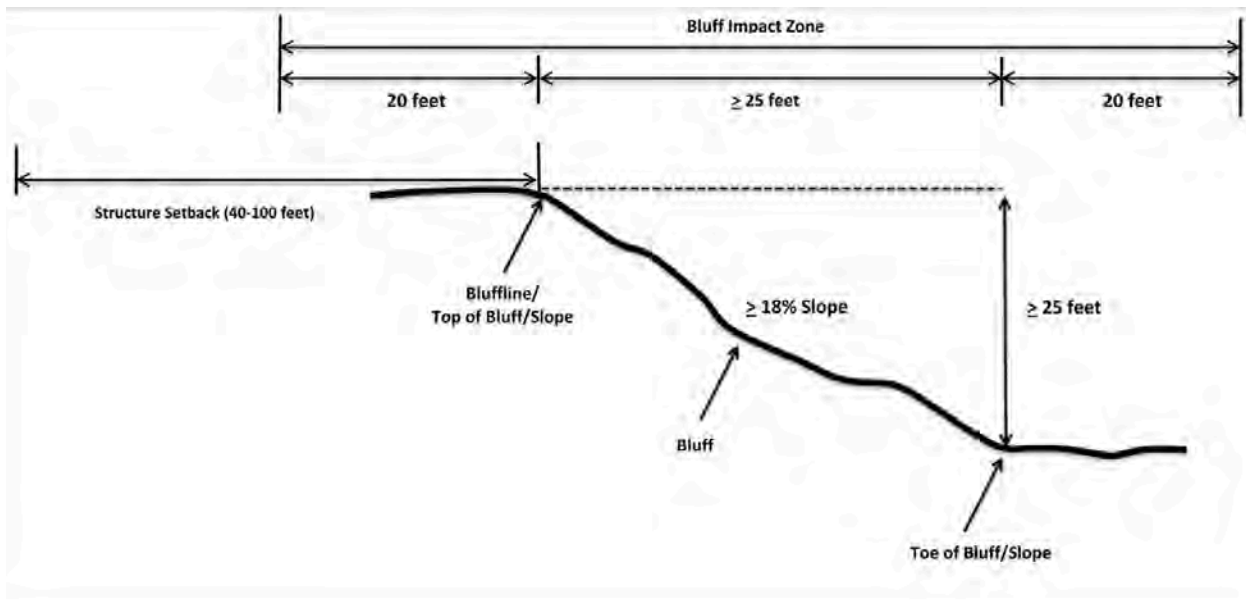


Fig. 2. A graphic illustration of the definition of the “bluffline”

Corridor Critical Area (Nov. 18, 2021) at 245. See Fig. 2.

The same publication shows that the grotto is part of the river’s bluff area. See Fig. 3.

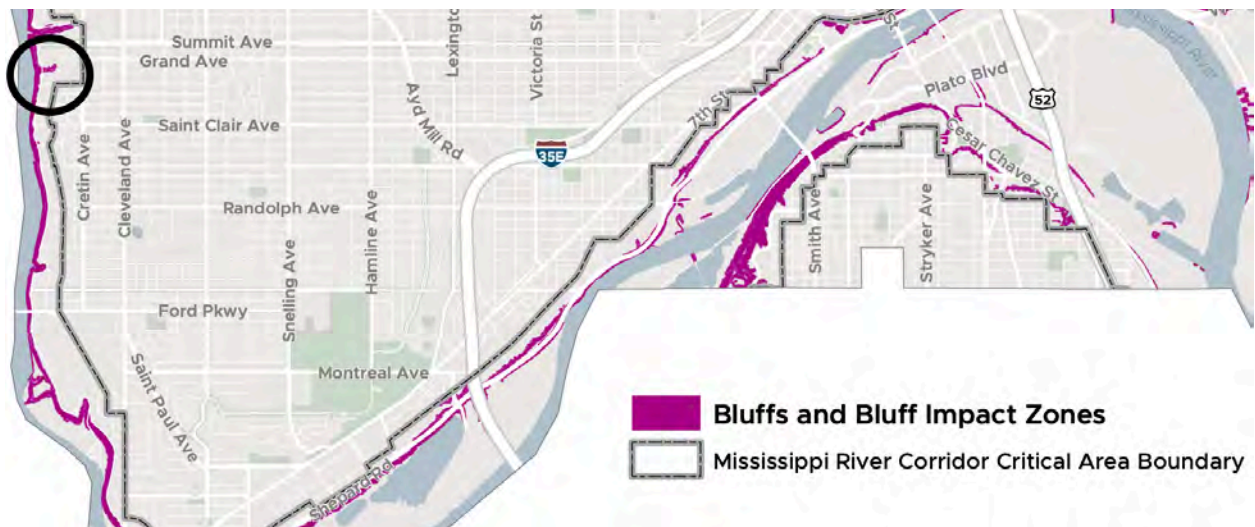


Fig. 3. This figure in St. Paul’s MRCCA Publication was taken from Minn. R. 6106.0050, Subp. 9. The grotto is circled.

When UST took title of the South Campus from the St. Paul Seminary in 1987, the Planning Commission’s College Zoning Committee determined, “In addition to specific requirements for each district, there are general standards regarding placement of structures, grading and filling, protection of wildlife and vegetation, and runoff, as specified in Section 65.410, that apply to uses in all River Corridor districts. These general standards will apply to development that occurs on the former Seminary campus as well. ... Two of these standards, which will affect where development can occur on the Seminary campus, prohibit development on slopes greater than 18 percent or within 40 feet of the bluffline (Section 65.411, Subd. 2, (5) and (6)). This means that no development can occur in the large river gorge that extends into the campus from under the Mississippi River Boulevard or within 40 feet of the bluffline created by the gorge (see Map 3, p. 14).” Recommendations of College Zoning Committee of the St. Paul Planning Commission, August 1988, at 11.

The consequences to a city if it permits a development that is prohibited by the MNRRA or MRCCA could include a finding by the federal government that the city is noncompliant and is therefore ineligible for financial assistance until it returns to compliance. The federal government took exactly that action in 2023 when the city of Minneapolis approved construction of a house within the bluff impact zone. The DNR has also sued Minneapolis to halt construction of the house. *Minnesota Dep’t of Nat. Resources v. City of Minneapolis and Wattenhofer*, Hennepin County District Court file 27-CV-24-1524.

A specific area of concern is a ravine extending east from the river called the grotto. The grotto runs under the Mississippi River Boulevard and into the South Campus. The arena would be located just 40 feet from the bluffline of the grotto. By extension, this is also the bluffline of the river itself, and is specifically included in the mapping of the bluffs of the Mississippi River. To state it another way, the river bluff is located a little over about 40 feet west of the arena’s western wall, and is located at approximately the midpoint of that wall. There is just no possible way to redirect the groundwater around the arena and have it flow in a natural way toward the

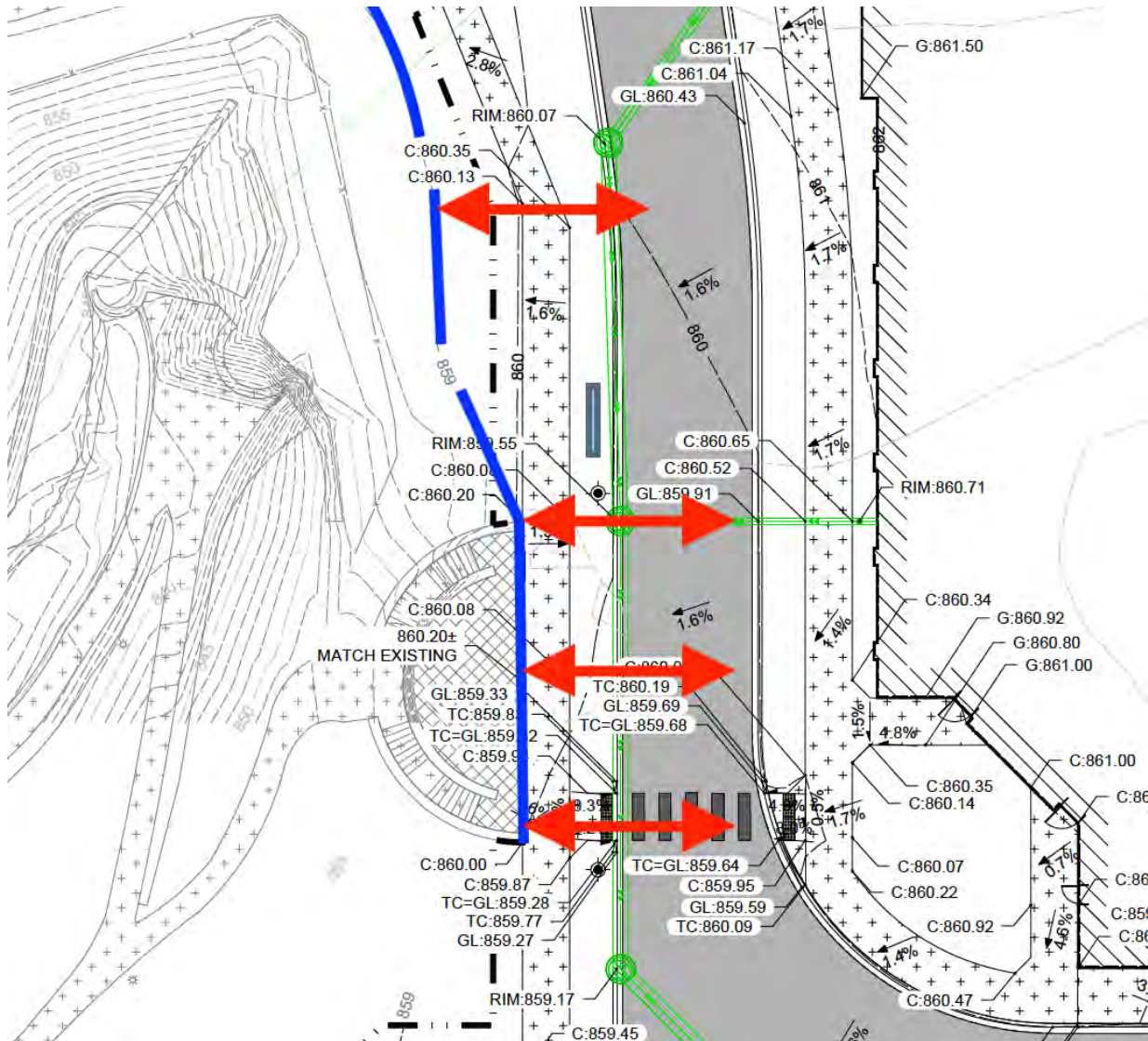


Fig. 4. The red arrows are approximately 40 feet long. The blue line is the bluffline.

grotto and the river. Concentrating the water (e.g., running it through a pipe) would cause massive erosion wherever the pipe ends. At the same time, the lack of groundwater will dry the soil, kill the vegetation, and result in erosion from rainfall.

The site plan shows that UST plans extensive development above and below ground adjacent to the bluff. Above ground, the site plan includes a two-way roadway with parking lane and a sidewalk within the 40-foot zone next to the bluffline. That leaves no permeable surface for rainwater to fall and soak into the ground, rather than running into a gutter and being transported elsewhere by pipe. Fig. 4. Unfortunately, the site plan is consistent with UST’s plan in its Environmental Assessment Worksheet that 5.97 acres of the arena’s 6-acre site will consist of impermeable surfaces. The MRCCA Rules mandate that “structures and impervious surfaces must not be located in the bluff impact zone.” Minn. R. 6106.0120, Subp. 3B. St. Paul Leg.

Code § 68.402(b)(4) is more restrictive, prohibiting development of any kind within 40 feet of the bluffline.

That prohibition of development of any kind would apply to the extensive underground pipework that the site plan envisions within 40 feet of the bluffline. Page C500B of the site plan shows a utility plan that includes multiple utilities underground adjacent to the bluffline. A fiberoptic line would run under a sidewalk just feet from the bluff; a new stormwater pipe, new electrical lines, and new water lines would lie a few feet further east, all within 40 feet of the bluffline. Steam and condensate pipes would lie east of all those pipes and would be about 40 feet from the bluffline.

In the specific case of UST's South Campus, the importance of the bluff impact zone is heightened. According to the EAW, the groundwater beneath the site is only 6-12 feet below surface and the groundwater flows directly to the Mississippi River. Anyone walking along Cretin Avenue at Lincoln Avenue can hear the groundwater running beneath through an uncovered grate. If the arena were built in a narrow configuration on an axis perpendicular to the river, groundwater would flow around the building and continue on its way to the river. But the planned arena is such a huge building that there is no possible way to avoid cutting off the groundwater flow to the area between the arena and the river. This leaves the bluff impact zone high and dry — too high to benefit from any groundwater that could flow underneath the arena and dry because its paved surface is impervious. There will be insufficient moisture to maintain the vegetation in the bluff area, and the death of the vegetation and its root structures will accelerate erosion during any introduction of moisture, whether it be a rainfall or a release of water from the arena. The bluff will eventually broaden, and the soil supporting the UST sidewalks and roadway may give way, pulling those hardscape structures into the river gorge.

A natural spring exists within the arena site near the grotto; its water flows toward the river, although its flow is not at the surface level because St. Thomas previously paved over it for a parking lot. The spring is cited as a natural feature in the Department of Natural Resources Inventory. Presumably, the spring water contributes to the health of vegetation and the river bank. This spring area would include the outer wall of the planned arena, so if UST is unsuccessful in killing the spring, the structural integrity of the arena could be in peril.

The arena's effects on the bluff area will extend to the wildlife that inhabit the grotto. Most of them (e.g., foxes, deer, coyotes, waterfowl, turkeys, raptors) restrict themselves to spaces that are not immediately adjacent to human habitat. The Mississippi River is a gathering place for many of our more wild creatures. With the immediate proximity of the building to the bluff, the shadow that the 75-foot high arena would cast for much of the day, and the lack of moisture and resulting loss of vegetation, the grotto and the remainder of this section of the river bluff will become inhospitable as a habitat.

The MRCCA prohibits *any* development within 40 feet of the bluffline, and UST's planned development is extensive above and below ground. No plan with such development in the bluff impact zone can be approved. This is far more than a technicality; UST's planned development would have dire consequences for the river bluff.

The City may not approve an EAW that includes development in area where Leg. Code Chapter 68 prohibits development. It would be arbitrary and capricious to accept the EAW as drafted with development within 40 feet of the Mississippi River bluffline.

4. THE EAW CANNOT BE ACCEPTED BECAUSE IT INCLUDES TRANSPORTATION ROUTES, UTILITY AND OTHER TRANSMISSION SERVICE FACILITIES AND CORRIDORS ON SOILS SUSCEPTIBLE TO EROSION, AREAS OF UNSTABLE SOILS, AND AREAS WITH HIGH WATER TABLES, ALL OF WHICH ARE STRICTLY PROHIBITED.

The City's Legislative Code contains provisions to prevent damage to soil structures that are fragile for a variety of reasons. One provision that protects fragile soils is section 68.402 regarding the placement of structures, with "structures" meaning not just buildings but also the physical elements (roads, pipes, tunnels, etc.) that may lie outside the buildings.

Section 68.402(b)(5) prohibits the placement of facilities and corridors for "transportation, utility and other transmission service" in ten environments, three of which are present in the arena site: (g) "Soils susceptible to erosion, which would create sedimentation and pollution problems"; (h) Areas of unstable soils which would be subject to extensive slippages"; and (i) "Areas with high water tables."

The nature of a river bluff is that there is a marked drop-off in ground level, such that soils lack lateral support to keep them in place. Without that support, forces acting vertically or horizontally displace the soil to a lower elevation, which is the essence of erosion. Combined

with the flow of water, the soil may be carried from its starting point into a river. The above



Fig. 5. Map CA-8 of the MRCCA Publication, showing unstable soils as measured by soil erosion susceptibility. South Campus is in upper left.

section discussing the bluff impact zone discusses how the incredible size of the arena will choke the supply of groundwater to the westward side along the bluff, and how that deprivation will accelerate erosion as the vegetation dies and loses its hold on the soil. But even without the added effects of the arena, this site would be considered prone to erosion.

St. Paul has already identified the South Campus as a site with unstable soils. Map CA-8 of the MRCCA Publication graphically demonstrates the locations in St. Paul where the soils are considered unstable. Fig. 5. Various shades on Figure 4 identify the soil as being unstable. Within the classification of unstable soils are gradations for “low” instability or “high” instability. Although some of the arena site is on the lower end of the gradations, the fact that it is identified as having soils that are unstable *at all* is sufficient for the application of statutory restrictions that apply where unstable soils are present. Of course, the bluff and the areas immediately adjacent are at the extreme high end of the scale of unstable soils (note the dark shading of these areas in Figure 4), indicating that the area is extremely susceptible to erosion.

The high water table is shown by the EAW, which determined that groundwater is a mere 6 to 12 feet below ground level in the arena site. That would normally be considered a high water table, but in this context it seems even higher: the cross section of the arena indicates that it will extend further than that below the ground surface. That disruption to the natural water table on such a massive scale will surely have ramifications for the surrounding areas. For example, if the groundwater cannot flow naturally through the arena site and is instead diverted to the north and south on its way west toward the river, one would expect that the groundwater volume would be

much greater to the north and south of the arena, making the water table higher there than it already was. That diversion effect is already present in the saturated, spongy soils that have resulted from the construction of Schoenecker Center near the arena site. Yet the arena plans contain utilities, tunnels, and paved surfaces in the areas north and south of the actual arena building.

The Legislative Code makes it clear that these structures should not be placed in these ecologically fragile settings. Leg. Code § 68.402(b)(5) prohibits the massive network of structures that service the arena. Underground, these include the various utility services described above that exist in the bluff impact zone and throughout the arena site, sewer pipes, stormwater pipes, and tunnels. This includes the extremely long sewer line run to Summit Avenue, where the sewer main surely was not built to handle the peaks of waste that an arena of this size would add. Above ground, these include sidewalks, curbs, and of course the new roadways that would carry the heavy trucks needed to service a major entertainment venue. Before the Planning Commission, UST claimed that its road is exempt from the prohibition against transportation routes next to a bluff because its planned road is a “public transportation facility.” Minnesota Rule 6106.0180 indeed exempts public transportation facilities, but UST’s road does not meet the definition: “all transportation facilities provided by federal, state, or local government and dedicated to public use, such as roadways, transit facilities, railroads, and bikeways. Minnesota Rule 6106.0150, subd. 57 (emphasis added). This roadway is being built by St. Thomas, not the government. The exemption does not apply. The roadway is prohibited. The road next to the bluff is just a road, designed to get buses and trucks to and from Summit Avenue. Pursuant to Minnesota Rule 6106.0180, roads are not permitted within 40 feet of the river bluff unless “no alternatives exist.” The site plan includes an alternative, namely the access road directly to Cretin Avenue.

Each the three conditions (susceptible to erosion, unstable soils, and high water table) would independently be sufficient to serve as a bar to St. Thomas building an arena at this location. Together, they indicate exactly why shoehorning a massive arena into a riverbluff site was destined for failure. The site is protected from such harmful development. The City would be acting in an arbitrary and capricious manner if it accepted this EAW and did not require an EIS.

5. THE SITE PLAN MUST BE REJECTED BECAUSE IT INTERFERES WITH PUBLIC RIVER CORRIDOR VIEWS.

A “primary objective of the [MRCCA] is to protect views to and from the Mississippi River.” MRCCA Publication at 244. The MRCCA Publication reflects three policies relevant to the UST arena:

Policy CA-10. Regulate building height, placement and design consistent with the intent of the MRCCA rules to protect, enhance and minimize impacts to Public River Corridor Views.

Policy CA-12. Consider designated Public River Corridor Views from other communities



Fig. 6. View of arena from Minneapolis side of the Mississippi River. (Source: UST site plan application, Ex. 3).

in developing dimensional standards, view impact evaluation procedures, and mitigation identification procedures.

Policy CA-13. Support shorter buildings closer to the river's edge and taller buildings as distance from the river increases in order to maximize views of and from the river, and preserve visual access to the river as a public good (rather than privatized right).

The new arena would dominate sightlines from the Mississippi River, presenting its gray western facade to those who would otherwise be enjoying the river's wildness. Fig. 6. The City's

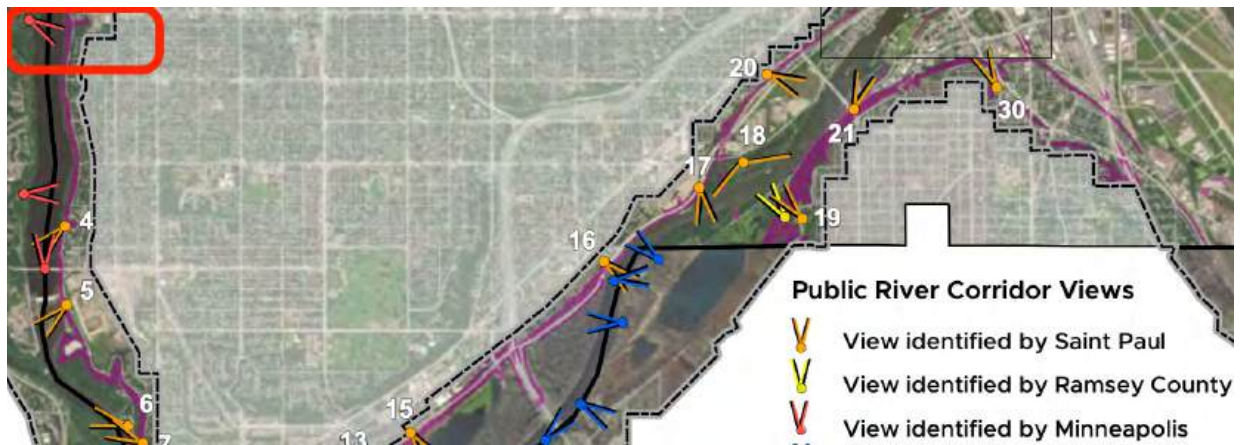
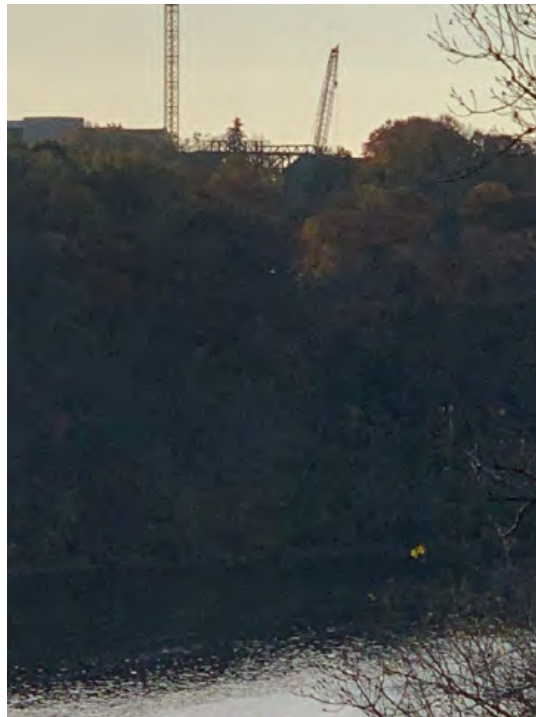


Fig. 7. Source: *Mississippi River Corridor Critical Area*, adopted Nov. 18, 2021 (City of St. Paul), at 263 (the Public River Corridor View in the corner was identified by Minneapolis).

MRCCA Publication identifies the scenic overlook at East 36th Street and West River Boulevard in Minneapolis (Fig. 7, upper left corner) as a Public River Corridor View, and it looks directly at the arena site. The arena would be a dominating presence when viewed across the Mississippi

River. At 75 feet tall, the arena would be taller than mature trees — but there will be no mature trees growing near the arena. The trees shown in UST’s rendering in Figure 6 would have no place to grow because the surface west of the arena is nearly 100% impervious. Any mature trees west of the arena grow from a lower part of the bluff, 40 feet below the blufftop perch of the arena. They would not screen the arena from the river.

From the Lake Street Bridge over the Mississippi River, the arena is easily visible even though it is only about 40 feet high at this point. By the time it reaches 75 feet, it will be a towering presence over the river gorge.



While St. Paul already has some other tall buildings that soar over the riverside treetops and negatively impact the public river views, these are currently considered the results of poor city planning allowed by prioritizing private development over public enjoyment of the river’s wild beauty. They would not have been permitted under the City’s current codes, and neither should the UST arena.

Specifically, the City legislated a maximum building height in the RC3 River Corridor Urban Open Overlay District. That maximum height is 40 feet. Leg. Code § 68.233. That maximum applies throughout the RC3 district, unless a different provision of the code provides a lower maximum height (in the H2 district that includes the arena, the maximum building height is 39 feet).

The simple fact is that the arena’s height is inconsistent with the MRCCA’s “primary objective” of protecting views from and of the Mississippi River. The EAW does not address this contradiction and does not analyze what the effects of the arena’s height might be from the MRCCA point of view. There is also no investigation of possible mitigation.

It would be arbitrary and capricious for the City to accept the EAW and not require an EIS to investigate the effects of the arena's interference with public river corridor views.

6. THE EAW CANNOT BE ACCEPTED BECAUSE IT LACKS A PLAN TO SAFEGUARD HAZARDOUS CHEMICALS THAT IS APPROVED BY THE POLLUTION CONTROL AGENCY.

Erection of an ice arena on the river bluff is not permitted due to the toxic nature of the two main chemicals used in rink refrigeration and the likelihood of a leak. There are many locations in St. Paul where an ice rink may be permitted, but the Mississippi River Bluff is not one of them.

Leg. Code 68.233(d) provides that "No use shall be permitted which is likely to cause pollution of water, as defined in Minnesota Statutes, Section 115.01, unless adequate safeguards, approved by the state pollution control agency, are provided." Minn. Stat. § 115.01(13) contains the following definition: "'Pollution of water,' 'water pollution,' or 'pollute the water' means: (a) the discharge of any pollutant into any waters of the state or the contamination of any waters of the state so as to create a nuisance or render such waters unclean, or noxious, or impure so as to be actually or potentially harmful or detrimental or injurious to public health, safety or welfare, to domestic, agricultural, commercial, industrial, recreational or other legitimate uses, or to livestock, animals, birds, fish or other aquatic life; or (b) the alteration made or induced by human activity of the chemical, physical, biological, or radiological integrity of waters of the state."

Any ice arena placed next to a waterway risks the release of fluids that could contaminate and poison the waterway in the adjacent area and downstream. Ice arenas rely on refrigerants that are highly toxic, and leaks are all too common. Rink refrigeration systems use ethylene glycol (also known as concentrated antifreeze) to lower the freezing point in the rink's chiller system. Short-term exposure from the oral intake of ethylene glycol can cause vomiting, drowsiness, coma, respiratory failure, convulsions, cardiopulmonary effects, and kidney and brain damage. The immediate effects of exposure to high concentrations of ethylene glycol can cause death to animals, birds or fish.² The Update states (at 38) that the refrigerant system for the ice rinks will use 1,200 pounds of anhydrous ammonia and 6,000 gallons of an ethylene glycol solution. The ethylene glycol will run through approximately 20 miles of underground tubing to cool the concrete under the arena's two ice rinks.³ The cooling system for the building (separate from the rinks) will use 937 pounds of anhydrous ammonia and 4,000 gallons of ethylene glycol solution.

Given the high toxicity of ethylene glycol, one would expect that it would be handled in a manner to avoid leaks. But the high volume needed (even for one rink, but UST's arena would have two) and the complex systems required to keep a sheet of ice refrigerated in an arena that is

² CDC.gov Ethylene Glycol Public Health Statement
<https://www.atsdr.cdc.gov/ToxProfiles/tp96-c1.pdf>.

³ St. Paul's Xcel Energy Center uses ethylene glycol in 10 miles of underground tubing to cool its rink. <https://www.cbsnews.com/minnesota/news/good-question-how-do-crews-prepare-ice-for-nhl-games/> (accessed Nov. 6, 2024). UST's arena would have two rinks of a size similar to Xcel Energy Center's rink.

warmed for spectator comfort make it difficult to avoid leaks. The following are documented leaks of ethylene glycol ice arenas:

- The Ralph Engelstad Arena, Grand Forks, ND, December 13, 2023 (500 gallons)
- Northbrook Park District, Northbrook, IL, September 27, 2021
- Folsom Ice Rink, Sacramento, CA, November 21, 2021
- “Patsy” Di Lungo Veterans Memorial Ice Rink, East Haven, CT, March 2020
- Crystal Fieldhouse Ice Arena, Burton, MI, July 10, 2018
- Seymour-Hannah Sports and Entertainment Center, Niagara Falls, May 1, 2016
- Pelham Civic Complex, Shelby County, Alabama, September 20, 2016
- Huron County Expo Center, Bad Axe, MI, Aug 12, 2008
- Ice Palace, Spokane, WA, October 19, 2007

Anhydrous (without water) ammonia is an inexpensive refrigerant widely used in ice arenas. It can be deadly. At room temperature and atmospheric pressure, ammonia is a gas. It can be compressed into a liquid under pressure, or when cooled. This liquified ammonia is used as a refrigerant. It is classified as a B2 refrigerant (toxicity class B, flammability class 2) according to ASHRAE, the American Society of Heating, Refrigerating and Air Conditioning Engineers. The refrigerant is highly toxic, with inhalation potentially causing respiratory failure, unconsciousness, skin or eye irritation, freezing injuries or death. The physical effects are a result of anhydrous ammonia (NH₃) reacting with moisture in the mucous membranes to produce ammonium hydroxide (NH₄OH), a corrosive, alkaline compound. Liquid ammonia is a common cause of fish kills. Arenas use thousands of gallons, and the EAW specifically identifies ammonia as a refrigerant that UST intends to use in its ice rink. Fatal ammonia gas leaks have occurred in industrial uses and in ice arenas.⁴

To protect the community from potential chemical risks, including ammonia refrigeration system operations, the U.S. EPA region 1 (Minnesota is region 5) passed an “Emergency Planning and Right-to-Know Act.” Improper application or handling of liquid anhydrous ammonia can lead to ammonia volatilization (loss of ammonia gas to the atmosphere). Clouds of anhydrous ammonia are subject to air movement and will change direction with the breeze. The ammonia is heavier than air and will settle in low areas of surrounding landscape. Areas surrounding the leak would need to be evacuated. The Minnesota Department of Health, designates permanent rules for indoor ice arenas, Minnesota Rules Ch. 4620, but there is no system in place to notify the public of their risk of hazard exposure or safety procedures in the event of a chemical leak. Causes of leaks can include a broken weld, loose valve packing or compressor shaft seal failure. These failures are not infrequent in ice rink chiller systems. A Minnesota Department of Agriculture report states “ammonia is a strong base and will corrode galvanized metals, cast iron, copper brass or copper alloys.”

⁴ <https://www.mlive.com/public-interest/2023/04/ice-maker-arctic-glacier-fined-232k-over-michigan-ammonia-spill.html> (reporting second leak of Arctic Glacier ice packaging facility and one fatality in first leak; ISSUU North American Guide to Natural Refrigerants in Ice Arenas <https://www.dceew.gov.au/environment/protection/npi/substances/fact-sheets/ethylene-glycol-12-ethanediol>). See also <https://www.nts.gov/investigations/AccidentReports/Reports/RAR0401.pdf> (1 death, 11 serious injuries, and 322 minor injuries from railway anhydrous ammonia spill in Minot, ND).

With ammonia exposure being deadly and a high volume required by ice rinks, it is vital that the ammonia be properly contained. That is evidently easier said than done. The following are documented ammonia leaks at ice arenas:

- Oyster Bay Ice Skating Center, Nassau, NY, January 28, 2024
- Centennial Sports Arena, Circle Pines, MN, December 1, 2023, latest of “3-4” leaks
- Leddy Ice Arena, Burlington, VT, July 7, 2023
- Reno Ice, Reno, NV, April 10, 2023
- Falmouth Ice Arena, Falmouth, MA, November 18, 2022
- Tewksbury Ice Rink, Tewksbury, MA, August 30, 2022 (1 hospitalization, neighbors evacuated)
- Capital Clubhouse Ice Rink, Waldorf, MD, March 9, 2021
- Loring Arena, Framington, MA, March 2, 2021
- Fernie Memorial Arena, Fernie, B.C., October 18, 2017 (3 fatalities)
- Ashburn Ice House, Leesburg, VA, June 27, 2017
- Canal Park Ice Rink, Washington, D.C., January 6, 2016
- Prospect Park Ice Rink, New York, NY, October 15, 2015 (2 hospitalizations)
- Louis Astorino Ice Rink, Hamden, CT, August 25, 2015
- Pineville Ice House, Pineville, NC, April 22, 2015

The numerosity and severity of the documented leakage events indicate that this is a serious problem. Vague assurances that “we know what we are doing” do not constitute safeguards, particularly when uttered by an institution that has never owned a refrigerated ice rink. Chemical skills can be deadly to fish and wildlife. See <https://www.desmoinesregister.com/story/tech/science/environment/2024/03/29/fish-kill-in-nishnabotna-river-spill-said-to-exceed-750000-department-natural-resources-nitrogen/73125495007/> (750,000 fish dead due to fertilizer leak). Luckily, none of the arenas with documented leaks of ammonia or ethylene glycol are adjacent to a river bluff.

The UST’s EAW states (in section 12(b)(ii)) that the Grotto is a “linear aquatic feature that conveys stormwater runoff from impervious surfaces within the project site.” It also states that “2 acres of impervious surfaces drain into the grotto” and that the grotto “follows a drainage channel west towards the Mississippi River.” The EAW goes on to say that the remaining 2.8 acres of impervious surfaces drain southeast to an existing storm sewer tunnel which discharges to the Mississippi River.” Consequently, all chloride from salt use for 4.8 acres of deicing sidewalks and roads will drain into the Mississippi. Any hazardous material leaked and not contained would also likely drain into the Mississippi. The Minnesota Department of Agriculture report quoted above also stated that, “since ammonia is very soluble in water, there will be no layering effect when liquid ammonia is spilled into a surface water body. Brooms, pads, sweeps and pillows that are usually used to contain and recover petroleum are ineffective on spills of ammonia into surface water.”

The MRCCA chapter of the 2040 Minnesota Comprehensive Policy places the UST Multipurpose arena in districts CA-RN (river neighborhood), CA-RTC (river towns and crossings) and CA-ROS (rural and open space). It also places the proposed arena in the following primary conservation areas: shore impact zone, natural drainage ways, bluff and bluff impact zone, significant existing vegetative strand, and unstable soils area with areas of high erosion

susceptibility. As the arena has already been designated to be in an unstable soils area, there must be complete evaluation regarding the distinct possibility that the ground may shift during the arena's lifetime with cracking of equipment, pipes or coils and leak of hazardous waste.

When rinks are constructed, they use the newest technology to protect against toxic spills. Breakaway Ice Center in Tewksbury, MA boasts two "state of the art ice rinks." An ammonia leak there in 2022 sent one person to the hospital and led to an evacuation of the neighborhood. The Ralph Engelstad Arena in Grand Forks, ND has marble floors, leather seats, and a rink cooling system that leaked 500 gallons of ethylene glycol sixteen months ago. The nature of ice rinks that requires thousands of gallons of toxic chemicals is that they are reasonably likely to leak, even when the soils are stable and even when the rink staff has extensive experience. St. Thomas does not have those advantages, and it has no prevention plan other than optimism.

When the St. Paul Planning Commission and City Council were considering UST's site plan for the arena, ARD objected in part because UST had no safeguard in place approved by the Minnesota Pollution Control Agency as required by Leg. Code 68.233(d). Without safeguards approved by the MPCA, there is no means to prevent chemical spillage and water pollution. Page 38 of the Update mentions a prospective "Ammonia Plant Safety Program," but that does not meet the standard of MPCA approval and does not address ethylene glycol. It sounds like a made-up name that means nothing, similar to the Update's (at 49) vague statement, "There will be safety plans in place to handle the ammonia use appropriately." The EAW is the place to state what measures are in place and to mitigate effects that result in spite of those measures, not to state that plans will be devised later. The arena cannot be constructed unless it incorporates safeguards against leakage into its design. UST's claims that it knows what it is doing are meaningless (particularly in light of its inexperience) and do not meet the clearly stated legislated requirement of approved safeguards. The City would be arbitrary and capricious if it accepted an EAW without the legislatively mandated safeguards for the hazardous chemicals that UST plans to employ in the arena. An EIS is required to further investigate whether this project can move forward without an MPCA-approved safeguards. The risk of contamination of the water table 6 feet below the surface and the adjacent Grotto and Mississippi River is just too great.

7. THE EAW MUST BE REJECTED BECAUSE IT DOES NOT ADEQUATELY ANALYZE GREENHOUSE GASES (GHGs).

- a. The EAW does not analyze greenhouses gases for the phased project.

The EAW's analysis of greenhouse gases omits Schoenecker, the Microgrid Center, and the SPS parking lot. The Court of Appeals has already determined that the failure to include Schoenecker was arbitrary and capricious. Opinion at 9 ("By failing to consider the project as part of a phased action that included Schoenecker Center, the city overlooked 'an important aspect of the problem.'"). Now the City omits Schoenecker and the Microgrid Center, even though the EAW acknowledges that both are expansions of the facilities that they replaced. Update at 5, 7. Additionally, the EAW does not state that the former facilities are being razed, indicating that the addition of Schoenecker and the Microgrid Center represent complete 100% gains in facility space, rather than just moving programs and removing the old locations. Because they are 100% gains in space, their inclusion in the analysis of environmental effects, including GHGs, is

mandatory. The City may not accept an EAW that does not address the GHGs generated by Schoenecker and the Microgrid Center.

In 2019, the City adopted the Climate Action and Resiliency Plan (the “Climate Plan”). The goal of the Climate Plan is to achieve carbon neutrality in the city by 2050. The 2040 Comprehensive Plan Policy T-21 states, “Reduce vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles.” The City, the State of Minnesota, and the University of Saint Thomas all have plans to be carbon neutral. The Site Plan does not satisfy, or even adequately address, these goals; instead, it flies in the face of these public goals.

The Arena will produce a huge increase in greenhouse gases both because of the Arena itself and the traffic and parking problems it will generate. The mandatory Environmental Assessment Worksheet for the project found the Arena would triple greenhouse gases (GHG) from the building alone (despite the building’s planned LEED Silver status) but it did not measure many important aspects of GHG generation in the building and, notably, did not measure new vehicle trips generated into the city by the Arena.

Who in the city enforces City policies? Does anyone in the City government review projects for GHG reductions? The EAW contains no statement that the project meets the climate action plan goals or the 2040 Comprehensive Plan, because the Arena will not meet those goals.

The Arena EAW provided more GHG questions than answers. In response to a comment, it noted, “Evaluation of expected GHG emissions and potential impacts to climate change are required elements of an EAW process” (page 7). Although the state mandated the EAW process and the 2040 Comprehensive Plan require actions to move the City toward carbon neutrality, the only assessment is that the project is “generally consistent” with the Comprehensive Plan. How was this determination made? The response in the final EAW to a comment, on page 14, states “The subsequent permitting process will provide opportunities for further comment on the appropriateness of the project and compliance with the Comprehensive Plan.” However, the Site Plan is silent on the calculation of GHG from the Arena.

ARD has asked the City Department for Resilience and Sustainability, headed by Russ Stark, if that department weighed in on this project and the answer was that it had not. He said this is the job of the planning department. Who will make the determination to allow a facility that will be one of the largest generators of GHG in the City? We think it must be the City Council. The lack of clarity is important because, as we demonstrate below, the Arena will be a huge GHG generator.

Sports are a major contributor to GHGs. Even the United Nations has a program urging carbon reductions in sports. [United Nations Environment Program, Sports and the Environment <http://www.unenvironment.org/>]. In spite of the importance of the Arena, the EAW emissions (at Item 18) estimate omits many key contributors to GHG in the Arena, including refrigeration and A/C, chemical fire suppressants, industrial gases, employee commuting [UST has 138 sports employees], and travel of employees and teams to away games. The EAW failed Minnesota Environmental Quality Board guidance to provide project-specific emission sources, describe the methods used to quantify emissions, describe the process used to determine emissions and, most

importantly, to describe “any GHG emission sources not included in the total calculation.” The biggest omission, however, is GHGs generated by the fans it attracts to its games. The inclusion of fan visits in calculating GHG is a standard which has been endorsed and adopted by the Minnesota Court of Appeals in the 2003 case of City of Bloomfield v. City of Burnsville, 666 NW 2d 414.

On page 17, the EAW response to a comment about GHG emissions, states “The Project is in the early stages of design and the design details have not been finalized. The mitigation strategies identified in the EAW have not been incorporated into the operational emissions calculations as presented in the EAW.” If all of this information is incomplete, how could the City decide that this project is “generally consistent” with the Climate Plan? Was that work completed but not shared with the public? And if the EAW is incomplete on GHG, how can the planning department have approved a Site Plan which does not provide this information and provide clarity?

The Climate Plan states that transportation represents 31% of citywide greenhouse gas emissions. “Reducing transportation emissions is critical to achieving the goal of carbon neutrality by 2050” (Page 8) and “land use and urban form” is one of the three key influencers of transportation emissions. On November 9, 2023, the City of Saint Paul celebrated its success on its Climate Plan at an inaugural climate forum. Most of the projects highlighted sought to reduce auto usage. However, using the numbers St. Thomas provided in the EAW, the Arena will generate 59,000 NEW vehicle trips for sports alone—not including other events, which remain undetermined. The sports complex and the traffic it generates will emit greenhouse gases (GHGs). Even though their toxicity is well documented, even though there are federal, state and local governmental actions to reduce them, even though we are already experiencing their effects on our climate, even though St. Thomas claims it wants to be carbon neutral within a decade, UST nonetheless puts forward the least efficient Arena plan in the worst possible location. In this case, the GHGs are being emitted in a residential neighborhood and on the bluff of the Mississippi River.

St. Thomas is hoping that thousands of people come to the Arena but has not addressed in any way the pollution that will be generated by all those trips.⁵ The Minnesota Court of Appeals

⁵ Similarly, St. Thomas’s EAW avoided discussing the pollution that would be emitted by a 6,000-seat arena. It is intuitive that a facility that maintains two permanent ice rinks will have a large energy footprint. At times, the rink will be covered so a temporary basketball floor and seating can be placed atop it, but the fact remains that a facility that warms the basketball arena while simultaneously freezing the ice beneath is inherently energy-inefficient. The EAW states (at 32), “Emissions from cooling and refrigeration systems are not accounted for in this operational analysis as GHGs from refrigerants are approximately less than five percent of the total GHG emissions of a building.” The EAW then cites to a source that says *no such thing*, and has nothing to do with arenas or ice rinks. The cited source states, “There are typically refrigerants or coolants that inadvertently leak from HVAC or refrigeration equipment. Project Drawdown ranks refrigerants as the No. 1 solution for reversing global warming. Given the regulatory environment for the U.S. health care sector, most hospitals report that this is less than 5 percent of their overall GHG footprint, but it is still critical to confirm that is the case for each

recently noted that greenhouse gases from attendees *must* be analyzed in EAWs, *In re Mankato Motorsports*, No. A23-0091, *18 (Minn. App. 2023). In the case of UST’s Arena, this is a complicated subject because attendees will drive to campus and then will drive around and around the neighborhood looking for parking because UST admits its parking supply is many hundreds of spaces short, even after utilizing all of the on-street spaces adjacent to campus and making unrealistic assumptions to disguise the extent of the parking shortage. People will drive down residential street after street until they finally find a parking space far from campus. These neighborhood tours — undesired by fans and residents alike but favored by UST — will greatly increase the GHGs emitted, both by each vehicle and as a total.

Most large arenas are in downtown areas to take advantage of freeway and transit access, available evening parking, and the absence of adverse effects upon neighbors. UST has instead chosen to site an arena on a tight campus footprint, immediately adjacent on three sides to residential neighborhoods (and with the river on the fourth side). All of the pollutants emitted by the facility and the attendees’ vehicles will adversely affect those who live in this community.

UST’s imposition on the surrounding environment will be made worse by buses that deliver visiting teams and their equipment, youth teams, groups coming from bars or from campuses of visiting teams, and others arriving by chartered bus. The site plan does not include any place for those buses to park during games. The result is that they will park illegally on one of the nearby residential streets that does not allow parking without a permit (probably Summit Avenue, because the few other streets with 24/7 permit requirements will be impassible due to the problems described above) and will idle to stay warm because basketball and hockey are played in winter. With 66 home games per winter, this bus exhaust will impose a significant burden upon the residents and the wildlife along the river.

Arenas and stadiums, especially hockey rinks, are significant sources of GHG but the largest generator is fans’ transportation to these venues. [Triantafyllis, Ries and Kaplanidou. Carbon Dioxide Emissions of Spectators Transportation in Collegiate Sporting Events: Comparing On-Campus and Off-Campus Stadium Locations. *Sustainability*, 2018, 10, 241.] A study of professional hockey team in Finland found that 54% of total GHGs came from fans transportation to games. See Uusitala, V.; Halonen, V. In search of climate neutrality in ice hockey: A case of carbon footprint reduction in a Finnish professional team. *Journal of Environmental Management*. 2024, Vol. 355 120455. See Appendix A, page 12-A to this appeal. The location of stadiums and arenas can make a big difference in how much GHGs are produced. A recent study of two football stadiums compared GHG emissions in an urban on-campus venue to a suburban off-campus facility. The on-campus stadium “provided easy access for transportation and parking lots” and was served by several bus routes. The suburban off-campus stadium was 22 miles from its university, provided on-site parking for cars and chartered buses but had no public transportation. Despite the increased distance and lack of public transportation, the off-campus stadium produced significantly less transportation emissions per sports fan. The

hospital.” Yes, the *leakage* (not *usage*) of GHGs from *most hospitals* (given the applicable regulations) is less than 5% of their total GHG emissions. UST’s consultant, Kimley Horn, put that statement in the EAW to avoid disclosing of the arena’s energy use, and the city did not notice or question this deception.

difference is that when a car is idling from traffic and parking congestion, it produces much greater emissions than when it is moving. (U.S. Department of Energy 2015). These studies, and others like them, are significant in analyzing the Arena. Unlike the football stadiums studied above, UST’s campus is legendary for lack of parking, and this will be greatly aggravated by the new Arena. Under the Site Plan at Exhibit 6 (traffic demand), UST will not add new parking for the Arena but will remove a total of 264 parking spaces or more than 20% of the 1,317 on-campus total (EAW Transportation Study Table 5). When the Arena is complete, fans (and students and staff) will have to drive around searching for parking, and traffic will be highly congested in the area, which generates very high emissions. We believe the greenhouse gas emissions produced per fan would likely exceed any other arena in the metro area. The proposed Arena would likely double the number of cars that come to the campus during the sports season, with even more for non-sports events.⁶ Because these sports trips are more concentrated in time, and even less parking is provided, traffic congestion and searching for parking spaces will magnify GHG impacts. It is likely the new Arena will cause GHG from cars on campus to at least double. If other events at the Arena are counted (concerts, lectures, etc.), the consequences will be even more dire.

b. Emissions from trucks

Any gathering of 1,000-6,000 people is a major logistical event. People must arrive and depart, and they must have food and drink available. They will generate waste that needs to be removed. The EAW does not analyze any of these aspects of the Arena.

At a minimum, the following vehicles will be required:

Bus for visiting team	1
Buses for fans from visiting team, youth groups, etc. (assume 500 fans, coach capacity of 50, school bus capacity is 65)	4-11
Food truck (snack bar: hot dogs, popcorn, etc.) (Sysco/US Foods)	1
Beverage vendor truck (Coca-Cola/Pepsi)	1
Franchise food truck (e.g., Subway, Domino’s)	4
Dumpster hauler, trash	1

⁶ Total Parking spaces available on or adjacent to campus (from UST Traffic Study) =1,686. Number of class days from October 1 to March 31= 82. Campus parking spaces total 1,686 (minus 86 unoccupied per EAW Transportation Study) times 82 class days October 1 to March 31 equals 131,200 car trips. Using Transportation Study numbers we estimate NEW car trips to campus by fans during October 1 to March 31 as 59,124 or 31% of all trips to campus. In this estimate we excluded the fans currently attending campus basketball games.

All of those trucks will have to travel to the Arena and leave the Arena. The EAW does not designate a route, but it appears that these trucks and buses will enter the South Campus from Cretin Avenue, proceed west to the Arena, then depart to the north onto Summit Avenue.⁷ The disturbance of these vehicles to Summit Avenue is addressed further below. The relevant point for this discussion is that the EAW contains no analysis of the GHGs that the trucks will emit as they come to the Arena. The same can be said of the trucks that service Schoenecker (and its cafe) and the Microgrid Center.

c. Emissions from buses

The EAW states that it does not address team travel because visiting teams now come to campus for basketball games or go to St. Thomas Academy for hockey games. Update at 52. This is one example of the EAW's failure to consider environmental effects caused by the Arena.

Obviously, the suburban location of St. Thomas Academy (in Mendota Heights) is different than the urban location of UST. The STA rink overlooks a major freeway (Interstate 494) and is not near any houses. It is possible for a bus driver to arrive, keep the engine idling for hours, and depart without anyone noticing the exhaust from the bus. In an urban residential community, however, there may not be a place to park other than in front of a house — UST's site plan certainly provides no designated parking space for buses. Idling for hours in front of a house that may be 100 years old will certainly cause a disruption, and the exhaust will be palpable to any passing pedestrian. It is required that the EAW assess the impact of the Arena on the environment around the Arena, and this EAW fails to do so.

To be clear, the visiting team bus is only part of the problem. The Update discusses shuttle buses and buses bringing fans to and from restaurants. All of those buses have to park during the game, and UST has no off-street location for them to park. They will therefore park on residential streets. Most likely, they will discharge passengers on the west side of the Arena, drive straight north to Summit Avenue (there is no place to turn around), and will park on the north side of Summit Avenue. Why? The south side of Summit will be full of parked cars (no permit required) and the north side will have space available (permit required 24/7). There, the bus will idle until called to pick up passengers after the game. There will be no fear of being ticketed for not having a permit because the driver will be in the bus and can move it if parking enforcement were to arrive.

For those houses on the north side of Summit Avenue, a daily lineup of idling buses would be suffocating and would make life extremely unpleasant. Despite this prospect being described in public comments in 2023 to the EAW, UST's site plan still does not include off-street bus

⁷ The EAW's Transportation Study states (at 14), "It should be noted that the Summit Avenue / South Campus intersection is also expected to be modified to better accommodate larger vehicles, as the access is expected to be utilized by team buses and delivery vehicles." These modifications have already been made.

parking and the Update does not evaluate the GHGs emitted by buses. The City cannot accept an EAW that fails to address a major impact of the Arena, and must require an EIS.

d. Emissions from cars

The EAW did not discuss the effect that spectators arriving to and departing the Arena will have in producing greenhouse gases (GHGs). To the general public, GHGs constitute an environmental hazard from the reduction in ozone. But this section discusses a more direct hazard to the people who live among the nightly gridlock that would beset the neighborhood.

It would be problematic for each street surrounding UST's South Campus to add 50-100 cars driving through, looking for parking spaces. As described above, however, the problem is worse; vehicles will enter the street and sit idling for 17-28 minutes while waiting to turn onto Cretin Avenue. There is no parking on Cretin Avenue, so their journey will continue onto a different side street marginally further from the Arena, where they will again idle in line.

As they idle in front of the homes in the neighborhood, these vehicles expel exhaust into the air. That is the same air that is breathed by people who live in the neighborhood. With hundreds of them walking to the river or walking their dogs, this exhaust presents a noxious prohibition against going outside when the Arena is in use. For those with asthma or other respiratory conditions, the hazard is considerably more serious.

The EAW does not address the fact that these logjams of vehicles are on successive streets. The problem is not just that drivers on east-bound and west-bound Sargent will be unable to cross Cretin Avenue to continue to look for parking. The problem is that vehicles will set idling on Sargent, Princeton, Fairmount, Goodrich, and Lincoln Avenues, all successive uncontrolled intersections. The cumulative effect of this production of vehicle exhaust will permeate the neighborhood.

In sum, the site plan presents numerous hazards to pedestrians: crossing busy streets with no signals, crossing Grand Avenue at the same time as vehicles drive through, and walking in the driveway to APF when cars are using both lanes. The City Council should not approve a site plan that endangers pedestrians, motorists, and residents.

8. THE EAW MUST BE REJECTED BECAUSE IT IS UNSAFE FOR PEDESTRIANS, MOTORISTS, AND RESIDENTS.

Pedestrians

There are two types of pedestrians at issue: residents and Arena attendees. Residents already cross Cretin Avenue in large numbers to walk along the Mississippi River. Arena attendees would also cross Cretin, since some of the nearest on-street parking is east of Cretin and the Arena lies west of Cretin.

Residents typically cross at Goodrich, Fairmount, Princeton, and Sargent Avenues, consecutive streets that intersect with Cretin without any stop sign or signal. Crossing Cretin Avenue can be

difficult and is becoming more so as the Highland Bridge development south of UST continues to add thousands of residents. As described in UST's traffic study, these intersections will degrade to a level of service of E/F during Arena events. The delays experienced by vehicles unable to turn onto Cretin will be worse for pedestrians; vehicles are capable of rapid acceleration to take advantage of small gaps in traffic. Pedestrians generally lack that capability, particularly those with strollers or dogs.

Policy T-7 of the City's 2040 Comprehensive Plan provides the City will "Implement intersection safety improvements such as traffic signal confirmation lights, pedestrian countdown timers, and leading pedestrian signal intervals. Reduce pedestrian roadway exposure via median refuge islands, curb extensions, narrowed travel lanes, and other elements designed to lower motor vehicle speeds." In approving the Arena site plan, the City would move in an opposition direction: massively increased vehicle traffic that will make Cretin Avenue impossible to cross on foot at least 66 days out of the year.

The addition of curb bumpouts on Cretin Avenue at Goodrich Avenue demonstrates a recognition that this crossing will be perilous.⁸ With a continuous stream of attendee traffic, the bumpouts will be no substitute for a break in traffic.

One might think that Arena attendees will be able to avoid this danger by walking north to Grand Avenue, where a signalized crossing will help them cross Cretin Avenue. That will get them across Cretin, but that does not remove them from automobile traffic as they pass the Anderson Parking Facility ("APF") on their way to the Arena.

The entrance to the APF is just west of the intersection of Cretin and Grand Avenues. According to the EAW, that intersections functions with a "B" level of service today. The EAW predicts that the levels of service will be "E" before games and "F" after games. But UST has now changed its plan to make that intersection totally non-functional both before and after games. Although there is no doubt that the abysmal levels of service will cause gridlock on residential streets surrounding the Arena site, UST's design change escalates the risk of pedestrian collisions with vehicles.

The site plan submitted with the EAW included a skyway from the APF to the Arena, allowing all 1700+ predicted attendees who parked in the APF to enter the Arena without mixing with automobile traffic.

UST's subsequent submissions (Exhibits 11 and 12 to the administratively approved site plan) state that the skyway has been eliminated for cost reasons. The new pedestrian route from APF to the Arena is down a stairwell at the intersection of Cretin and Grand Avenues, across Grand Avenue, and then along a narrow sidewalk on the north side of Grand to the Arena.

⁸ The bumpouts are meant to benefit pedestrians, but a collateral effect is that they endanger bicyclists by forcing them from the curb into the main flow of traffic.

Ideally, the 1700+ pedestrians who parked in the APF will cross Grand Avenue when the light is green for north-south traffic. But that same green light is when the vehicles coming southbound from I-94 and northbound from Ford Parkway will want to turn into the APF. There will be two options available to drivers waiting for pedestrians: to try to drive through gaps in the pedestrian flow or just before the light turns red, or remain in place despite the lines of cars behind.

The site plan offers no alternative to this conflict. The pedestrians must walk north at the same location and same green light as vehicles must drive west to the APF. The pedestrians have no other route and the vehicles have no other route.

It should be further noted that the number of pedestrians is not just 1700+ from the APF. The thousands of spectators who parked in the neighborhood south of campus will also be crossing Grand Avenue at this same location. And once they all cross Grand, they will be met by all of the people who parked to the east of Cretin Avenue and crossed Cretin at Grand.

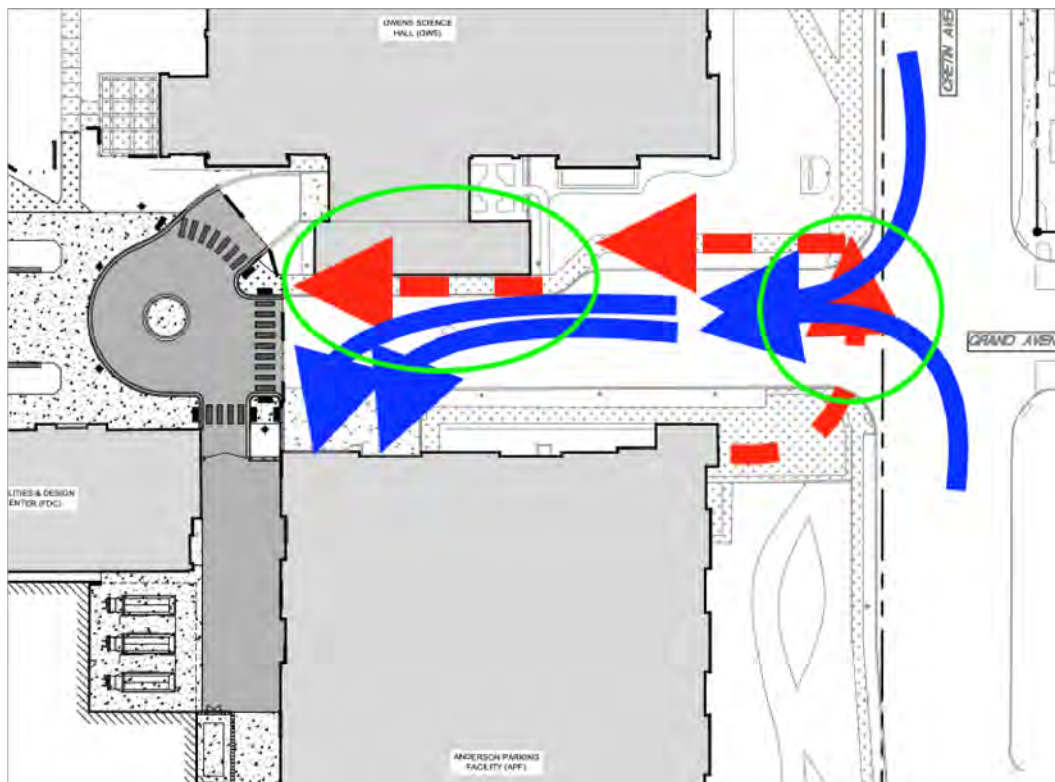


Fig. 1. Circled in green are the two new conflict areas UST has created between vehicles entering the ramp (blue arrows) and pedestrians (red arrows).

Source: Exhibit 7 of administratively approved site plan.

For those pedestrians who safely cross Grand Avenue, the danger does not end there. All of these combined flows of pedestrians will continue to conflict with traffic as they walk from Cretin Avenue toward the Arena. The sidewalk on the north side of Grand Avenue is only 8 feet

wide and cannot be widened because it abuts Owens Hall,⁹ so pedestrians will assuredly be walking in the street leading west to the APF. But UST's site plan calls for cars entering the APF to occupy two lanes, which means they will drive along the curb next to the sidewalk on the north side of Grand Avenue. See Fig. 1. This is inherently dangerous, with pedestrians walking in the street and cars driving up behind them on winter nights.

Motorists

Besides being a danger to pedestrians, UST's new traffic design would degrade the former predicted E/F levels of service to levels that would be below F if such a lower grade existed. That would affect not just Cretin and Grand, but all intersections into which this backup would extend — certainly to Summit and Grand (one block) and Goodrich and Grand (two blocks), but likely much further.

ARD's appeal memorandum included a section discussing how the EAW was inadequate. The above discussion shows how the traffic problems disclosed in the EAW, already forecast to be E/F, have now been downgraded further. This plan will affect not only Arena attendees, but everybody who lives along Cretin Avenue.

The increased risk of accidents involving motorists results not just from the high concentration of vehicles that the Arena would bring, although that is certainly a factor. The conflict of northbound and southbound cars on Cretin Avenue turning into the APF at the same time while pedestrians have the green light to cross in front of them is a certain recipe for disaster. Assuming that the cars yield, the backups caused up and down Cretin will increase congestion for the majority of cars, who do not have a reserved spot in the APF. With northbound Cretin's turn lane to the APF holding just a few cars, a small delay will quickly back up northbound Cretin.

The steady stream of cars on Cretin will encourage risky attempts to enter Cretin from the side streets, where dozens of cars will have found no parking spot and will seek to try on a different block. Cars that are parallel parked on Cretin near UST's stadium will attempt to pull into traffic, but will find a heavy flow of vehicles passing. Considering that all of these scenarios will occur in winter after nightfall, the risks mentioned here seem understated.

Residents

Because St. Thomas lacks parking for 1100-1600 vehicles (depending on game attendance and assumptions about how many people ride in each vehicle), these vehicles will drive around the neighborhood, looking for parking. This endangers the safety of surrounding residents because streets that are impassible to cars are also impassible to emergency vehicles.

St. Thomas's traffic study predicts that Cretin Avenue will be gridlocked (level of service = E/F) south of the Arena, which makes sense: the one-lane street cannot handle the addition of

⁹ This part of Owens Hall will be replaced by the Microgrid Center, but the design retains the narrow sidewalk immediately adjacent to the lanes of traffic.

hundreds of vehicles in a short period. It also predicts that vehicles on side streets will not be able to turn onto Cretin Avenue for up to 30 minutes before or after games due to the gridlock. If there are just 50 vehicles driving on each of these streets looking for parking, that is a backlog that will make each of these streets impassible.

Appendix A to this memorandum is an insightful analysis by Dr. Jerome Abrams that fully analyzes St. Thomas's model and shows that delays in exiting the side streets would exceed 17 minutes and would more likely be 28 minutes. Given the narrowed drive aisle caused by snowfalls that lead vehicles (especially those with passengers who must exit) to park a distance from the curb, it is impossible for an emergency vehicle to enter a side street during the time when vehicles backlogged from Cretin are clogging the side streets. Each time there is an Arena event, neighborhood residents would be left without assistance in case of fire or health emergency. By allowing the Arena to be constructed, the City would be imposing a perilous risk upon UST's neighbors, a risk that is reasonably foreseeable and has disastrous consequences.¹⁰

The Arena poses serious risks to pedestrians, bicyclists, motorists, and residents. Because the EAW does not analyze these environmental effects and provides no mitigation, it would be arbitrary and capricious for the City to accept the EAW. It must require an EIS that will address these issues.

9. THE EAW MUST BE REJECTED BECAUSE IT IS NOT BASED ON RELEVANT INFORMATION ABOUT PARKING DEMAND.

- a. UST's attendance in the Arena's main hall will likely be higher than 5,500

As described elsewhere herein, UST has a history of selling standing room tickets to increase attendance far beyond a venue's seated capacity. In the case of the Arena, UST's renderings show broad concourses and people standing behind the top row of seats (see the people in the #8 jersey and white shirt at left, below). There is ample room for standing room attendance.

¹⁰ The Minnesota United soccer team hosts 21 home games per year at Allianz Stadium, compared to UST's 66 home basketball and hockey games. The United play in the summer, so snow is no issue and bicycles can utilize the 400 bicycle parking spaces. Allianz has more than 1,000 available parking spaces on site plus dozens of commercial lots and ramps nearby. There is also a designated Lyft/Uber/Taxi zone at Allianz. Vehicles can access Allianz on the three major adjacent thoroughfares: Interstate 94, University Avenue, and Snelling Avenue. Most importantly, the stadium is on the A express bus line and has bus and light rail service on University Avenue. Even with these amenities, neighbors find the parking and traffic unbearable. In comparison, the UST arena has 691 parking spaces that are already occupied, no major thoroughfare, one bus line, and no zone for Lyft/Uber/Taxi.



The EAW and Update do not include any evaluation of standing room attendance. In fact, they do not even contain the phrase “standing room” or any reference to non-seated attendees. This lack of disclosure by UST prohibits the EAW from assessing the potential impact of Arena attendees on traffic and parking. If the Arena holds 1,000 more people than its seated capacity, *none* of those additional attendees will be parking in UST parking facilities, and *all* of them will create traffic problems in addition to the traffic problems already predicted in the EAW.

Because it is probable that UST will sell standing room tickets (see, for example, the discussion elsewhere in this comment that the average attendance in the NCHC exceeds the Arena’s capacity), the EAW does not and cannot adequately describe the impact of Arena attendees on the Arena’s environment. The City must require an EIS to investigate this probability.

b. The EAW does not contemplate the probability that people other than event attendees will be present at the Arena

The EAW generally states that UST players/coaches and event staff will park in the reconstructed Lot O south of the Arena, but that same lot is required to hold the vending trucks during events. Additionally, that 38-space lot could not possibly hold all of the trainers, security, box office and ticket takers, referees and scoring officials, vending staff, and maintenance workers required for an event (and each presumably driving individually).

More concerning is the prospect of two events occurring at the Arena at the same time. The Arena contains a main hall holding 4,000-6,000 depending on configuration. The Arena also contains a second ice rink with seating for approximately 1,000 attendees. Seating on both sides of the rink is shown on two UST renderings of the second rink:



Adding event participants, officials, and other support workers would boost the number of people at the second rink, and the drawing on the right also shows room for hundreds more to stand to watch the game.

Simultaneous use of both Arena spaces is probable. In 2024-25, there were 11 scheduled home basketball games on Saturdays and 15 scheduled home hockey games on Saturdays. The entire winter sports season only includes 17 Saturdays, so it is likely that a varsity hockey game will be occurring multiple times each winter while a varsity hockey or basketball game occurs simultaneously in the same building.¹¹ Needless to say, fitting a normal crowd into the second rink will require all of the standing room space available.

The EAW and Update do not address the likely simultaneous use of the two competition venues in the Arena and therefore do not accurately describe the Arena's impact on the environment. The City must require an EIS to provide an accurate assessment of the project's environmental effects.

c. The EAW does not contemplate the probability of multiple simultaneous events at UST.

The projections of available parking in the EAW and Update rely entirely on an unsupported assertion that UST will refrain from scheduling campus events when Arena events occur. This is an unrealistic assumption for a campus with 9,600 students, with UST misleadingly claiming that 1,000 will be at the Arena event.

For instance, the Anderson Student Center (ASC) contains the catered 1,000-seat James B. Woulfe Alumni Hall, a frequent site of large receptions on Friday and Saturday nights. ASC also contains restaurants and a bowling alley.

Schoenecker contains a musical rehearsal halls and a 195-seat performance hall; that number does not include the performers, who are shown in UST website photos to number at least 60. Larger still is the performance hall at Brady Education Center next to the Arena; the EAW does not disclose its size except to note that its capacity is larger than the Schoenecker performance hall. It is easily conceivable that a drama production occurs in Brady while the orchestra

¹¹ The same conflict will occur on Fridays, with 18 scheduled home basketball or hockey games in 2024-25.

performs in Schoenecker, likely on a Friday or Saturday night. It is probable that UST will not force its students to perform on (for example) Monday and Tuesday nights to avoid a conflict with a hockey or basketball game.

The EAW and Update pretend that no other events will occur on campus when it's "game time" for basketball and hockey. That is neither realistic nor believable. An EAW must examine the possible effects of the subject development, and this EAW ignores the probable occurrence of simultaneous events on campus. The EAW therefore does not provide an accurate description of the impacts that the phased project will have on the environment. The City may not accept this EAW and must require an EIS.

d. The EAW erroneously assumes a high number of passengers per vehicle

The Federal Highway Administration (FHWA) has studied travel data, including the number of passengers per car, per truck, per bus, and aggregate "per vehicle." The FHWA's calculations show that the average vehicle occupancy (AVO) for cars and aggregate per vehicle is 1.7. https://www.fhwa.dot.gov/tpm/guidance/avo_factors.pdf (accessed Nov. 7, 2024). This is a substantiated number that the EAW should incorporate into its assumptions regarding travel to the Arena.

In order to minimize its projected parking demand, UST's consultants assumed that an AVO of 2.75 people would arrive in every vehicle attending an event. According to the brief filed by UST in the case in which the Court of Appeals reversed the City's Negative Determination, the basis for the 2.75 AVO is an FHWA study. https://ops.fhwa.dot.gov/publications/fhwaop04010/chapter5_03.htm (accessed Nov. 6, 2024). That study provides a range of 2.2 to 2.8 people per vehicle, noting that 2.5 AVO is a common assumption. The study also notes that events that land high in the range would tend to be weekend events at a permanent venue due to families attending and groups of tailgaters. Basketball and hockey games are winter events (no tailgating) to which bringing the entire family would be unusual due to the expense. UST's basketball games also tend not to be on weekends. Given those factors, a factor of 2.2 or 2.25 AVO would be more appropriate; an AVO of 2.75 at the extreme high end of the FHWA study's range would not be supported by the study cited by UST.

Even using the 2.75 AVO, the EAW predicts that 4,250 Arena attendees will arrive by car (a minor percentage will arrive by bus). The number of vehicles utilized to bring 4,250 to the Arena depends on whether one assumes an AVO of 1.9 persons (2,237 cars), 2.25 persons (1,889 cars) or 2.75 persons (1,545 cars).

Using MNDOT average vehicle occupancy (AVO) of 1.9 persons per car means 2,237 cars arriving. UST revealed in its legal brief that it applied 2.75 AVO, which is at the extreme high end of a 2.2-2.8 AVO range derived from a study on baseball game attendance. A 2.75 AVO allows UST to claim that "only" 1,545 vehicles will arrive and that "only" 742 vehicles will have no place to park on campus or on streets adjacent to campus.

e. The EAW contains unrealistic assertions of student attendance.

St. Thomas unrealistically asserts that 1,200 students will attend games. But only 2,500 UST students live on campus. It is not realistic to predict that almost half of the on-campus population will walk to games on a consistent basis. The sole purpose of this inflated estimate is to understate UST's traffic and parking problems. The Update steps back marginally from the EAW's projection of student attendance (from 22% to 20% of the total), but not enough to make the projection realistic.¹²

f. The campus shuttle is limited during event times

The EAW points out that UST has a campus shuttle that would be additional to the Metro Transit bus lines that can bring attendees to events at the Arena. Update at 55. That is not really meaningful. The shuttle does not run on weekends, and on weekdays stops at each campus only once per hour after 5:30 p.m. Such infrequent service (similar to the Metro Transit line 87) make it an unlikely option for attendees.

10. THE EAW MUST BE REJECTED BECAUSE IT IS NOT BASED ON RELEVANT INFORMATION ABOUT AVAILABLE PARKING SUPPLY.

In the EAW, UST's consultants provided a count of available parking spaces at and around UST's campus. That count was not changed in the Update. An EIS is required because the parking count was intentionally skewed to undercount parking utilization and because it does not accurately reflect current usage due to enrollment increases and the opening of Schoenecker Center.

A. The 2023 parking count was intentionally skewed

Page 11 of the EAW's Transportation Study discusses a parking utilization count of the available on-street parking around UST's campus. The count was performed by UST's consultant, SRF. Page 11 states in relevant part as follows: "Parking utilization counts were collected by SRF from Thursday, March 30, 2023, to Saturday, April 1, 2023. The focus of the SRF parking counts was to collect data that was not captured by UST, such as on-street parking adjacent to campus (that do not require a city permit) and visitor lots on Friday and Saturday nights (i.e., 6 – 7 p.m.) that are expected to be utilized for events."

UST has argued that its decision to count vehicles on streets around campus on March 30-April 1 was not intended to undercount vehicles in order to minimize UST's parking shortage. Whether that is a truthful representation can be discerned from the following Department of

¹² For comparison, the University of Minnesota with its enrollment of 54,890 has two student sections for both basketball and hockey arenas: Williams Arena (basketball) has 45 sections total; 3M Arena at Mariucci has 24 sections plus upper-level seating. Student seating is less than 10% of both venues, while the Update asserts 20% student seating.

Natural Resources report of the storm that started early on March 30 and continued into April 1, 2023:

March 30 to April Fools' Day, 2023: Thunder, Slush, and Damaging Snow

An intense barrage of rain, sleet, thunderstorms, and very heavy snow blasted southern and central Minnesota from Thursday March 30 into Saturday April 1, 2023, resulting in widespread power outages, tree and limb damage, and new daily precipitation records.

By early morning on Saturday April 1, over 85 thousand households were without power—mostly in and around the Twin Cities Metropolitan Area.

[8.5 inches fell at the Twin Cities International Airport, starting Friday morning.]
<https://www.dnr.state.mn.us/climate/journal/damaging-winter-storm-march-30april-1-2023.html>

Given the weather, it is likely that most UST students decided not to attend classes on March 30 - April 1. Given that only about 2,500 of UST's 9,000 students live on campus, the result would dramatically change the demand on parking during that three-day storm. Between events at UST being cancelled¹³ and students choosing not to leave home,¹⁴ parking utilization would have been extremely low. In including this count in the EAW, UST's consultants vastly skewed the parking counts to misrepresent parking availability.

It would have been easy for SRF to count parking on days without a three-day storm — much easier than counting during the storm itself. Indeed, it would be difficult to think of a good reason to make *any* trip outside in the above-described weather when numerous events were no doubt being cancelled — unless one wanted to seize on the weather event and make a count of utilized parking that was intended to suggest parking availability where normally none normally existed. The 2023 parking count must be discarded because it was intentionally skewed.

B. The 2023 parking count is irrelevant to today's parking demand.

It would have been easy for SRF to do a new parking count in 2024. The results would be different, and not just because the 2023 count was done during a storm. UST has increased its incoming class size to its second-largest ever, “helping propel St. Thomas’ total student population to a four-year high of 9,445.” <https://news.stthomas.edu/st-thomas-celebrates-second-largest-undergraduate-class-in-20-years/> (accessed November 6, 2024). According to that announcement, graduate student enrollment also rose. This is contrary to the assumptions of the EAW Update, which states (at 2): “While the University aims for gradual expansion going

¹³ While it is difficult to tell from publicly available sources how many events were cancelled, it appears that UST's track meet on April 1, 2023 was cancelled. <https://tommiesports.com/sports/mtrack/schedule/2023> (accessed November 6, 2024).

¹⁴ Students may have missed class, but St. Thomas offers hybrid options for many classes that allow students the option of attending in person or virtually.

forward, enrollment in classes held on campus is expected to remain relatively consistent through the analysis period (2025), therefore, vehicular demand is expected to remain similar to existing conditions.” Increasing suddenly to the second-largest class is not the same as “gradual expansion.” Because UST has not expanded its on-campus housing stock (instead, it razed the Cretin Hall dormitory), more students are currently commuting to campus. The 2023 parking counts do not capture the 2024 demand for parking spaces, and must be discarded.

C. The 2024 parking count must be discarded because it does not include the effect that the opening of Schoenecker Center had on parking utilization — nor the effects of razing Cretin Hall and opening the Microgrid Center.

In its Opinion remanding this environmental study to the City, the Court of Appeals stated (at 13), “[T]he transportation study does not consider what impact, if any, events at Schoenecker Center would have on the parking-deficit analysis. This shortcoming must be addressed on remand.” Despite this clear directive, the Update does not include any analysis of the impact of Schoenecker, which is now open and occupied. If the EAW included a new count of parking utilization, an analysis would be possible to see if the hundreds of open parking spaces claimed in the 2023 EAW Transportation Study exist in 2024 when conditions have changed.

Of course, the opening of Schoenecker is not the only major change on the South Campus since April 1, 2023. In May 2024, UST demolished Cretin Hall, which housed 90 students. <https://www.stthomas.edu/residence-life/halls/cretin/> (accessed November 6, 2024). No new housing was added. The elimination of that dormitory resulted in 90 new commuting students and created new demands on parking supply at and around UST. This change must be taken into account as well.

Recently, UST announced that it is building a new microgrid research center adjacent to the Frey Science and Engineering Center on the South Campus. In 2023, UST received \$18.5 million in state and federal grants to expand its microgrid research capability. <https://energynews.us/2023/09/20/state-federal-funding-fuels-expansion-of-minnesota-microgrid-research-center/> (accessed Nov. 6, 2024). Don Weinkauff, UST’s dean of engineering, said the funding “will allow the center to expand both the program and the microgrid system itself.” <https://news.stthomas.edu/in-the-news-university-of-st-thomas-center-for-microgrid-research-to-expand-following-funding/> (accessed November 6, 2024). The expanded program will move to the South Campus, with construction of the new center expected by the end of 2025. The EAW does not address how many additional faculty, students, and support personnel will be present in the new Microgrid Center on the South Campus. Without including those numbers in the parking analysis, it is impossible to analyze the environmental effects of this phased development.

Because the Update does not provide information from which the City can assess the impact of elements of UST’s developments on the South Campus, it would be arbitrary and capricious for the City to accept the EAW; the City must require an EIS to provide a full analysis.

D. There is no such thing as "Relocated Parking"

The Update claims that UST will "reallocate" parking permits to clear parking for Arena events. Deprivation of parking permits to UST faculty and students only moves those vehicles from campus parking to on-street parking. It is the reason that the ring of permit-only parking continues to expand around campus. Instead of the possibility that Arena attendees will park on the street when an event occurs, intentionally emptying UST's parking lots only ensures that the on-street parking occurs. The environmental effect of the Arena still includes the effect on the neighborhood of UST's parking policies that are, in the end, a result of the Arena's use.

For the same reason, the "smart" parking touted in the Update is a farce. Overlooking for a moment the fundamental flow that UST does not control the adjacent on-street parking on which it claims to rely even though it is, in fact, completely unavailable, the "smart" parking system would only affect some Arena attendees. The other users of the UST campus, including those who already park on the street and those to be displaced by "reallocation," would be circling the neighborhood, looking for parking. "Smart" parking does not solve the zero-sum game; UST can move cars around from campus lots to the street, but the effect is the same: the Arena would create demand for parking that would greatly exceed available supply.

E. The potential construction of a parking lot by the St. Paul Seminary does not affect UST's parking count.

The Update claims that St. Paul Seminary is going to construct a parking lot on SPS's land, and that this parking lot will remove up to 70 vehicles from UST's parking facilities. This is disingenuous and exaggerated for several reasons.

First, SPS has not constructed a parking lot. It may do so, but funding and engineering concerns add uncertainty to the project. Even if it is built, however, its effects on UST will be small. It should be noted that UST provides parking to SPS because UST is contractually obligated to provide parking to SPS. This obligation is contained in an "Affiliation Agreement" between UST and SPS dated May 3, 1987 and stems from UST's acquisition of most of the Block (the entirety was SPS's campus) in 1987. The part acquired by UST included most of SPS's parking. There is no indication in the Update that this obligation will be diminished when and if SPS constructs a parking lot.

Second, SPS has only 100 seminarians. <https://saintpaulseminary.org/general/saint-paul-seminary-bucks-national-trend-with-100-seminarians-in-23-24/> (accessed Nov. 6, 2024). Its campus includes 68 outdoor parking spaces, plus indoor parking beneath the dormitory where the seminarians live.¹⁵ The Seminary just does not have the parking need that would cause it to need many parking spaces provided by UST, and certainly not 70. Seventy is a large number of

¹⁵ Retired priests living at the Byrne Residence have their own separate indoor parking facilities in the Byrne Residence.

vehicles, and the Update's false reliance on SPS's plans is an unjustifiable basis for UST to claim that it can accommodate 70 additional vehicles.

Indeed, the main impetus for SPS's construction of a parking lot is to accommodate a new building and welcome center that SPS plans to construct west of its existing buildings. The welcome center would re-orient the seminary toward the Mississippi River Boulevard; its original orientation was toward the Grand Avenue extension that brought arrivals to its administration building, designed by Cass Gilbert. If the EAW Update is going to consider SPS's parking lot as part of the phased development, then it must also consider the planned welcome center. An EIS is necessary to determine what effect, if any, the anticipated developments at SPS will have on UST's South Campus and the environmental effects of UST's new projects.

11. AN EIS IS REQUIRED TO ANALYZE THE FULL IMPACT OF THE YEAR-ROUND USE OF THE ARENA.

St. Thomas argues that community and the planning commission should ignore the public representations of UST's administrator that UST expects 35 sell-out events each winter. UST instead suggests that the representations of its traffic consultants should be believed, namely that UST expects 1-2 sellouts per year.



UST's depiction of its planned full Arena on its website (source: <https://news.stthomas.edu/publication-article/making-a-big-impact/>) (accessed May 20, 2024)



To the City, UST describes its intent to design its facility so that its teams will play in a half-empty arena

ARD notes that this gives the City three alternatives. UST favors the alternative that the City should believe that UST is wasting tens of millions of dollars building an arena that will make its teams look hapless, playing in a mostly empty arena. This, while UST lays off dozens of staff to trim non-athletic programs. UST pushes this narrative to downplay its net loss of 265 parking

spaces and the lack of infrastructure in this residential neighborhood to handle traffic and parking.¹⁶

The second alternative is that the UST administrator was accurate and reflected the efforts of UST to build winning basketball and hockey programs through recruitment and enhanced facilities so that UST can fill this Arena. This alternative would mean that the traffic study in the EAW does not accurately reflect the traffic and parking problems this Arena will cause. An EIS is therefore required.

In that scenario, it is important to note that a 5,500-seat arena does not cap attendance at 5,500 spectators. St. Thomas currently plays football in O'Shaughnessy Stadium, which has 5,000 seats. Football attendance often ranges as high as 6,500 spectators (presumably with many standing), EAW, App. D at 19, and the stadium's record attendance was 12,483. <https://tommiessports.com/sports/2020/7/23/facilities-O-Shaughnessy-Stadium.aspx> (accessed Nov. 7, 2024). The EAW must address the predictable situation in which 1,000 or more standing room tickets are sold for the new Arena.

This second alternative is consistent with UST's announcement, just days after the Planning Commission approved the Arena site plan, that UST would be leaving the Central Collegiate Hockey Association (CCHA) and joining the Northern Collegiate Hockey Conference (NCHC). The traffic and parking projections in the EAW were based on St. Thomas's membership in the CCHA. Among CCHA teams, average home game attendance was 2,464 in 2023-24. <https://www.uscho.com/stats/attendance/division-i-men/> (accessed May 20, 2024). Only one CCHA team (Minnesota State) has any appreciable fan base in the Twin Cities. In the NCHC, average home game attendance is 5,467, *id.*, and three teams (UM-Duluth, North Dakota, and St. Cloud State) would bring Twin Cities fan bases to games at UST. Those attendance figures are more than double the assumptions on which the EAW was based; if UST's attendance was just 75% of the average attendance in the NCHC, every home game would be a sell-out with standing room only (SRO) crowds. It should be added that UST now plays non-conference games against the University of Minnesota and the University of Wisconsin, and those games would be SRO as well.

A third alternative, which is not mutually exclusive to the second, is that UST is building this Arena as a midsize venue for rental. UST's Senior Associate Athletic Director Ben Fraser notes, "The new arena will also generate revenue through use for commencements, concerts and rentals

¹⁶ UST's argument naturally raises questions by analogy. Could any college or university in St. Paul erect a 50,000-seat stadium for its intercollegiate teams under the guise of building an "athletic facility" while admitting that it does not need such a large facility, and then rent it out for concerts by touring musicians, monster truck shows, political rallies, and other users who have no relationship to the athletic or academic programs at the college or university? The answer is "No" — the rental of the arena is a commercial activity. The South Campus is zoned H2, a housing zoning district that does not permit such commercial activities. St. Paul Leg. Code § 66.221. Yet the EAW and Update are silent on the fact that much of UST's planned usage is not permitted by the St. Paul Zoning Code.

of the arena's second sheet of ice."¹⁷ This arena size is where many of the musical acts perform in Minnesota. For example:

- In Mankato's 4,800-seat arena (home to the Minnesota State Mavericks hockey teams), the following artists have performed: Aerosmith, Tom Petty, Brooks & Dunn, Styx, Kiss, Def Leppard, REO Speedwagon, Poison, Sammy Hagar, Bob Dylan, ZZ Top, John Fogerty, Kenny Rogers, John Denver, Steve Miller, John Mellencamp, Miranda Lambert, Sugarland, Alan Jackson, Eric Church and Elton John.
- In the 5,500-seat Minneapolis Armory, the following artists have performed: The Chainsmokers, Henry Connick Jr., Trampled by Turtles, Wiz Khalifa, Lewis Capaldi, Macklemore, H.E.R., Lorde, Olivia Rodrigo, Judas Priest, Kesha, Machine Gun Kelly, Lizzo, Wu-Tang Clan, Tyler the Creator, Billie Eilish, Halsey, Alice in Chains, Jonas Brothers, and Dua Lipa.
- In St. Paul's 5,500-seat Roy Wilkins Auditorium, performing artists include Shawn Mendes, Hozier, Annie Lennox, Sam Smith, Imagine Dragons, Alice in Chains, Smashing Pumpkins, Kesha, Bruno Mars, Janelle Monáe, Foo Fighters, Snoop Dogg, Green Day, Alanis Morissette, R.E.M., Sting, Cyndi Lauper, Alice Cooper, Jethro Tull, Ozzy Osbourne, David Bowie, Bruce Springsteen, Bob Dylan, and The Grateful Dead.

Concert tickets sell for hundreds of dollars, while hockey and basketball tickets sell for tens of dollars. It seems probable that UST's plan to finance its arena will include frequent rentals for maximum-capacity crowds. At a public meeting on April 30, 2024, UST chief of staff Amy McDonough acknowledged that UST plans to rent out the arena to generate revenue. If the city assumes that St. Thomas has a rational plan to derive revenue to pay for a \$175 million arena, only alternative #2 and alternative #3 — or most likely, both — are possible.

Because UST has not fully disclosed the full extent of its planned use of the Arena, the City should assume that UST will be using the facility as often and as fully as it is allowed to use it. This means assuming full attendance for every event, and for maximum year-round use for large events. Once it is assumed that UST will fully utilize the Arena, it is even clearer that locating the Arena on the South Campus is inappropriate for multiple reasons: parking, traffic congestion, danger to pedestrians, motorists, and residents.

The EAW and Update are silent on UST's planned year-round use of the Arena as a rental venue, even though that use could easily eclipse the Arena's use for 66 home sporting events. By discussing only the sporting events, the EAW and Update fail to adequately describe and investigate the impact that the Arena will have on its environment. The City must require an EIS to encompass the entirety of the Arena's impact.

¹⁷ <https://www.tommiemedia.com/anderson-arena-funding-nears-completion-as-st-thomasadjusts-to-d1-costs/> (accessed May 20, 2024).

12. THE EAW MUST BE REJECTED BECAUSE IT DOES NOT ADEQUATELY INVESTIGATE OR MITIGATE EFFECTS ON WILDLIFE.

A. The rusty patched bumble bee

The EAW identifies the rusty patched bumble bee as a species that may be affected by the Arena's construction. In 2017, the U.S. Fish and Wildlife Service designated the rusty patched bumble bee as a federally endangered species. <https://www.fws.gov/species/rusty-patched-bumble-bee-bombus-affinis> (accessed November 7, 2024). In the Endangered Species Act, 16 U.S.C. §§ 1531 et seq., Congress found and declared that:

- (1) various species of fish, wildlife, and plants in the United States have been rendered extinct as a consequence of economic growth and development untempered by adequate concern and conservation;
- (2) other species of fish, wildlife, and plants have been so depleted in numbers that they are in danger of or threatened with extinction; and
- (3) these species of fish, wildlife, and plants are of esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people.

Although the EAW claims (at 42-43) that “the disturbed nature of the project site is not likely to provide suitable habitat,” it nonetheless discloses that there are eleven records of the bee's existence within this so-called “disturbed” site. Either the site is not as “disturbed” as the EAW claims or the bees exist despite it being a disturbed site.

The objective facts are that the rusty patched bumble bee exists within the project site and that the EAW does not address how the project may affect this bee. An EIS is required to investigate how UST's project (and SPS's parking lot, since these bees burrow underground) could affect the rusty patched bumble bee and its habitat.

B. Species of “Special Concern”

The EAW also discloses (at 41) that Kentucky Coffee Tree and Swamp White Oak, both designated by the U.S. Fish and Wildlife Service as species of “Special Concern”, exist within the project site. Although species of “Special Concern” receive lesser protection than endangered species, the EAW is still required to investigate the environmental effects of the development on these species. The EAW contains no such analysis, and an EIS is therefore required.

C. Bird species

The EAW acknowledges that the South Campus is within an Important Bird Area designated by the Audubon Society, but contains no analysis of how UST's buildings will affect birds.

It is estimated that 365 and 988 million birds die annually due to window collisions in the United States alone. Loss, Scott R., Tom Will, Sara S. Loss, and Peter P. Marra. “Bird–Building Collisions in the United States: Estimates of Annual Mortality and Species Vulnerability.” *The Condor* 116, no. 1 (2014): 8–23. Birds have little depth perception and contrast sensitivity,

making it difficult for them to distinguish a reflection from reality.

<https://birdsconnectsea.org/our-work/urban-conservation/bird-safe-cities/preventing-bird-window-collisions/> (accessed Nov. 47, 2024). The result is that they fly into windows, thinking they are flying into open sky. St. Paul is among the ten most dangerous cities for migratory birds (6th in spring migration, 7th in fall migration). https://www.stpaul.gov/sites/default/files/2023-02/Bird%20Safety_0.pdf (accessed Nov. 7, 2024). With North American bird populations having declined 29% since 1970, *id.*, it is especially important that we protect birds where they are known to amass.

UST's Arena design (seen below, from <https://tommiesports.com/feature/lee-and-penny-anderson-arena> (accessed Nov. 7, 2024) shows three stories of an all-glass facade. This would face north, so that birds flying south, whether they live on campus or are migrating along the course of the Mississippi River, would be endangered by this tall glass facade. Despite its location in the migratory pathway and the obvious hazard that three stories of glass present in that particular location, the EAW makes no attempt to analyze any effects that the Arena may have on the bird population. The City may not accept an EAW that so seriously fails in its central function. An EIS is required to study the effects of the UST projects on bird populations.



D. Coyotes, foxes, waterfowl, turkeys, and raptors

The South Campus constitutes part of the habitat of a variety of species that live in the community near the Mississippi River. These species include one or more coyotes frequently seen along the Mississippi River between Shadow Falls (just north of Summit Avenue) and the Grotto, foxes, waterfowl, and raptors. A family of turkeys (seven hatched in the spring of 2024, grew into adults, and now travel with their parents along Mississippi River Boulevard) are also part of the wild species that call the South Campus home. The EAW does not identify them, let alone analyze what effects UST's projects may have on them. This is a serious shortcoming that must be remedied through an EIS.

Although the EAW and Update acknowledge that some of the above wildlife exist on the project site, they fail to investigate the impacts that development of the project site will have on the wildlife and do not provide any mitigation measures. The City would be arbitrary and capricious if it accepted the EAW and must require an EIS.

13. THE EAW DOES NOT ADDRESS THE IMPACTS ON SUMMIT AVENUE AND THE WEST SUMMIT AVENUE HISTORICAL PRESERVATION DISTRICT.

Summit Avenue is part of the West Summit Avenue Heritage Preservation District. That district was established in 1980 to preserve the historical nature of Summit Avenue west of Lexington Avenue. With an Arena, Summit would carry traffic from neighborhoods east of UST, particularly as a means of avoiding the backlog on Cretin Avenue as thousands of cars drive from Interstate 94 toward campus. The conversion of Summit Avenue as a conduit for stadium traffic would destroy the residential and historical character of the avenue.

The burden on Summit is compounded by the fact that the Arena's service road connects directly to Summit. All trucks and buses servicing the Arena will enter on Cretin Avenue and exit on Summit (there is no place for such large vehicles to turn around and go back to Cretin Avenue). That means all of the food vendor trucks (e.g., Sysco), beer trucks, soda trucks, equipment trucks, garbage trucks, recycling trucks, and team buses will travel on Summit Avenue. Summit will deteriorate into a private commercial drive for UST heavy traffic.

Smaller vehicles will also use Summit Avenue. The only conceivable location where taxi/Uber/Lyft vehicles would discharge and pick up customers near the Arena is through the entrance from Summit Avenue, which goes to the Arena and has a turn-around circle. The Cretin Avenue and Mississippi River Boulevard entrances to the Block will be gated, so the Summit entrance is the only available option. The EAW predicts that 335 event attendees will arrive and depart by ride share, but each vehicle must arrive twice (once before and once after the game) and depart twice (same), making four trips down Summit for every use of ride share. That is, at a minimum, hundreds of additional trips down Summit (if 335 people crammed into 100 taxis, that would result in 400 trips down Summit per event; if they rode solo it would result in 1,340 trips per event). Summit Avenue would become a very busy street for each Arena event, night after night.

Event traffic is not the only impact that UST's site plan would bring to Summit Avenue. The site plan calls for changes in the traffic patterns inside the South Campus, most notably the elimination of direct access from Cretin Avenue (at Grand Avenue) to every part of the South Campus other than Owens Science Hall and Anderson Parking Ramp. Other buildings on the South Campus (Anderson Arena, Grace Hall, Binz Refectory, Brady Education Center, O'Shaughnessy Science Hall, and the new Schoenecker Hall) will have their access to Grand

Avenue eliminated.¹⁸ Access will instead be through the Summit Entrance. All cars, delivery vans, service vehicles, garbage trucks, and other vehicles that previously entered from Cretin would be required to drive down Summit Avenue and into the Summit Entrance.

Summit Avenue's parkway exists because property owners west of Lexington Avenue donated 50 feet of land on both sides of the avenue to create the space for the entire city to enjoy. But Summit remains a residential street, and a well-known one at that. Its architecture has inspired books and drawn tourists to St. Paul. If Mitchell Hamline Law School or Macalester College (both are on Summit) were to decide to build a 6,000-seat arena and use Summit Avenue as a connecting street to the arena, the city would not allow it because it would destroy the avenue and make it unlivable. Both are in residential settings, and the arena would be incompatible. The same should be true for St. Thomas. Turning Summit into UST's service drive presents the same problems (the sight, vibration, sound, and smelly emissions of buses and trucks) for residents as for bicyclists and pedestrians. But residents must live through it all the time. Feeding 6,000 people per event takes a fleet of trucks, and each truck must pass every house as it accelerates, drives, and stops. Because the basketball and hockey seasons are in winter when dusk is earlier, the headlights from trucks coming from the Arena will be a constant annoyance to residents (see photo to the right of vehicle leaving UST toward Summit Avenue). It would be bad enough if Arena-related traffic only affected those who live or drive on Summit Avenue. But Summit is a destination for bicyclists and pedestrians who travel to the river and either turn around or connect to the Mississippi River Boulevard to travel north or south. The presence of the trucks and buses and ride share vehicles will have an adverse impact on one of St. Paul's most heavily used recreational routes.

Headlight Effect: Because basketball and hockey are winter sports, the headlights of trucks and buses leaving through the Summit Entrance will be on and aimed straight at residential properties

¹⁸ A service drive will extend from the arena to Cretin Avenue, but would be gated so that only arena traffic could use it.

on the north side of Summit Avenue. Below is an illustration of the effects of the headlights (taken from south side of Summit Avenue) and from inside the affected house.



The effect of up to 24 buses leaving the Summit Entrance *per game* (once to drop off, once to pick up) would add to the impact described above. Adding the food, beverage, trash and recycling trucks would further compound the effect. The site plan also includes 38 parking spaces for cars, meaning within a few hours for every game, more than 60 vehicles would aim their headlights directly across the street at residential properties (the figure shows the house directly across from the Summit Entrance, but as the vehicles turn onto Summit Avenue, their light would be shared with the neighboring residences as well).

Any analysis of the environmental impact of a Division I sports arena should discuss the basic requirements for such an arena to function successfully. Without including the totality of those who need to access the arena, any discussion would be misleading and could vastly understate the impact on the arena's environment. This is a fundamental flaw of the EAW, which does not include such a discussion. Using comparisons to other arenas (adjusted for different seating capacities, where appropriate), the nominal requirements for a 4,000-5,500 seat hockey and basketball arena would be as follows:

	# per game (range of 3,000- 5,500 spectators)	Gross Vehicle Weight
Bus for visiting team*	1	20,000
Buses for fans from visiting team, youth groups, etc. (assume 500 fans, coach capacity of 50, school bus capacity is 65)	4-11	20,000
Food truck (snack bar: hot dogs, popcorn, etc.) (Sysco/US Foods)*	1	30,000

	# per game (range of 3,000- 5,500 spectators)	Gross Vehicle Weight
Beverage vendor truck (Coca-Cola/Pepsi)*	1	22,000
Franchise food truck (e.g., Subway, Domino's)*	4	15,000
Dumpster hauler, trash*	1	28,000
Dumpster hauler, recycling*	1	28,000
Cars (using EAW's 2.75 fans per car)	900-1,650	6,000 or less
Pedestrians (assume 500 students from north campus, remainder walking from cars parking in neighborhood)	2,750-5,000	N/A

* This number will apply to all games, regardless of attendance.

Trucks using the South Campus's drive to Summit will cross both a sidewalk and a bicycle path, endangering both pedestrians and bikers. For each of UST's 66 home games, one would expect a Pepsi truck, a beer truck, several food semi trucks (e.g., Sysco) smaller food vendor trucks (e.g., Papa John's, Subway), and garbage and recycling trucks — it takes a lot to provide food and drinks to an arena full of people.

The example of the Pepsi truck maneuvering across the Summit Avenue sidewalk and bicycle path illustrates the danger posed to those who traverse Summit.



Parkway Restrictions: The St. Paul City Council has designated Summit Avenue a “parkway.” Vehicles driving on parkways may not exceed 9,000 pounds. St. Paul Leg. Code §§145.02, 170.07. All of the various trucks and buses accessing the Arena through the Summit Entrance vastly exceed the parkway limit of 9,000 pounds. Their use of the parkway is contrary to the City’s aim to achieve “the maximum enjoyment by all persons and protect[] the natural resources therein.” St. Paul Leg. Code §170.10. The EAW is completely silent on the impact of bus and truck traffic that will not only violate the City’s protections placed on designated parkways, but will severely impact the residential and historical character of Summit Avenue.

Parking: The site plan includes space for bus parking. Because they will not be able to park at the Arena, they will have to exit the South Campus, leaving out the Summit Entrance and re-entering Summit Avenue. Many will likely park (illegally, due to full-time permit parking restrictions) on westbound Summit Avenue west of the median break to the Summit Entrance. There — or any other place in the neighborhood they can find parking — they will idle to keep

the bus warm during the winter hockey and basketball games. This would be true no matter where fans loaded and unloaded, because the site plan lacks bus parking.

The entire neighborhood — including the entire UST campus — is zoned residential. Although the zoning district permits some institutional uses, the use proposed by the EAW changes the character of the entire neighborhood to an institutional use. This is most impactful on Summit Avenue due to the site plan’s addition of car, bus, and truck traffic to the Summit entrance. At the same time, Summit Avenue has been designated as a protected parkway and has its own historic preservation district. The EAW does not investigate how UST’s projects will impact Summit Avenue and its historic district, and therefore offers no mitigation to the development’s effect on Summit Avenue. It would be arbitrary and capricious of the City to accept an EAW that does not address these environmental impacts, and the City must require an EIS.

14. THE EAW MUST BE REJECTED BECAUSE IT LACKS EFFECTIVE MITIGATION STRATEGIES.

The mitigation strategies relating to greenhouse gases are described in Item 18.b.i on page 50 of the Update, but where the EAW form directs the City to “[d]escribe and quantify reductions from selected mitigation” and “[e]xplain why the selected mitigation was preferred,” the EAW does neither, stating only “The proposed mitigation listed in Item 18.b.i includes the best management practices for new construction and reducing GHG emissions where practicable during operations.”

A large part of the EAW’s failure to provide effective mitigation strategies is that the effect of the development on the environment is not fully described. UST has withheld damaging information about the size of other venues on campus (including the second ice rink but including other venues holding hundreds or even 1,000 people).

A larger part of the problem is that no mitigation strategy can be effective unless it is binding. The EAW does not propose any binding measures, like because UST’s consultants wrote the EAW. The UST campus is subject to a CUP and inclusion of a mitigation measure in the CUP would create a binding obligation, but the EAW does not propose any changes to the CUP. Like the 2023 Negative Declaration that was rejected on appeal, the EAW and Update lack any meaningful mitigation strategies.

CONCLUSION

“An EIS shall be ordered for projects that have the potential for significant environmental effects.” Minn. R. 4410.1700, subp. 1. One way to discern whether this potential exists is to thoroughly investigate the possible environmental impacts and discuss them in an EAW. This EAW and the Update fail to address such a wide and deep list of environmental impacts that it is impossible to determine that the Arena and related projects will not have significant environmental effects. The EAW and Update are based on assertions of minimal use that are inconsistent with UST’s past use of its athletic facilities and with UST’s own athletic aspirations. There is certainly a potential for UST’s assertions to be wrong and for the minimized environmental effects to be correspondingly much greater than asserted.

The City has a responsibility to its citizens to ensure that private development projects conform to the legal standards set forth in state law for environmental review. In 2023, the City failed in that endeavor, and the Court of Appeals ruled in favor of Advocates for Responsible Development in almost all of ARD's arguments. ARD simply asks that the City fulfill its duty by determining that the EAW drafted and provided by UST's consultants does not demonstrate that there is no potential for significant environmental effects. The City must require an EIS.

Advocates for Responsible Development
2239 Fairmount Avenue
St. Paul, MN 55105

Contact:
Daniel L. M. Kennedy
(612) 728-8080
dan@lakestreetlaw.com

Appendix to Appeal filed by Advocates for Responsible Development

Safety Risks of the Planned University of St. Thomas Arena

Executive Summary

The current plan for the University of St. Thomas (UST) arena has failed to adequately evaluate safety risks. Part I of the following discussion will examine the risks to neighborhood residents that result from obstruction to arrival of emergency vehicles during arena events. Part II will identify more general risks. The plan states that neighborhood streets will be used for parking during (UST) arena events. The plan does not include data or estimates of parking density, width of streets with two-sided parking during winter snow, or the time for parked cars to exit the neighborhood streets such that emergency vehicles have neighborhood access. The following discussion assumes an event capacity of 5500 attendees. A UST spokesperson stated in the EQ Monitor that events having 5500 attendees will occur 35 times a year. Making the reasonable assumption that individuals will park as close to the arena as possible and will park at the same density as currently measured with UST students and staff parking on the north side of Goodrich Avenue, the neighborhood bordered by Goodrich Avenue, Princeton Avenue, Mississippi River Boulevard, and Cretin Avenue can accommodate over 300 cars. With two-sided parking and narrowing of the streets by snow left at the curbs during winter, measured width of the streets ranges from 15 ft 8 in to 16 ft 5 in. With two-sided parking and travel in one direction, the width was measured at 8 ft 5 in. First responder emergency vehicles are 10 ft wide and require a lane wider than 10 ft when in motion. Cretin Avenue is the likely choice of exit from the neighborhood. Exit time to Cretin Avenue from, for example Fairmount Avenue, was measured at 2 minute intervals from 4:36 PM to 5:30 PM. Average delay for cars to enter the traffic flow on Cretin Avenue was 41.4 seconds. Assuming one way traffic and no pedestrian traffic, emergency vehicle access to the neighborhood will be delayed 41 minutes. With two-way traffic, the delay time is likely to be increased. American Heart Association guidelines state that for, heart attack, door to treatment time goal is less than 30 minutes. For stroke, door to treatment time goal is less than 60 minutes. These guidelines will be impossible to meet under these conditions. The obstruction to emergency vehicle access to the neighborhood as a result of the arena events risks the lives and health of neighborhood residents. Please see Part I for details of the model.

Part I Neighborhood-specific risk features

A neighborhood adjacent to the UST South Campus arena is that area bordered by Cretin Avenue, Goodrich Avenue, Princeton Avenue, and Mississippi River Boulevard. We assume that people will choose to park as close to the arena as possible without paying, even if more distant off-street parking is available. This assumption is reasonable, given that hockey and basketball are primarily winter sports, and arena attendees will likely choose to walk no further than necessary in the cold and snow. Distance from the curb to the curbside of parked cars and the residual width of the streets with two-sided parking was measured 3/26/2024 following a snowfall. The average width of the remaining width for driving was 17 ft 4 in. With a car in the driving lane and two-sided parking, the remaining width was reduced to 8 ft. 5 in. A first responder emergency vehicle is 10 ft wide and, consequently, cannot pass. When in motion, the

emergency vehicle requires a lane greater than 10 ft wide. The measurement did not include the width of parked pick-up trucks and their extended side mirrors.

- A. Determination of the number of cars exceeding the capacity of the Anderson parking ramp and needing parking.

For an event of 5500 attendees, 2.7 passengers per car, and using the UST estimate of 22% arriving by non-motorized means, 1589 cars will seek parking. For the same capacity, 1.7 passengers per car, and 22% arriving by non-motorized means, 2523 cars will seek parking. The figure of 1.7 passengers per car is used in FHA traffic analyses.

- B. Determination of parked car capacity in the neighborhood adjacent to the arena area bordered by Cretin Avenue, Goodrich Avenue, Princeton Avenue, and Mississippi River Boulevard.

This neighborhood was chosen for analysis because of its proximity to the proposed arena. The parked car capacity of the neighborhood was calibrated as follows. UST students and staff park on the north side of Goodrich Avenue, when school is in session. The number of cars parked between Cretin Avenue and Mississippi River Boulevard was counted and averaged 54 vehicles. This value was used as a measure of number of vehicles per street unit length. Capacity of the neighborhood is 330 cars. The number of cars seeking parking is in excess of 330 cars. Consequently, the adjacent neighborhood streets are likely to be used for parking. Fairmount Avenue, as an example, has a capacity of 84 cars parking on both sides of the street from Woodlawn Avenue to Cretin Avenue.

- C. Calculation of delay in exit of parked cars

The issue is the delay that will occur when the arena event concludes, the attendees attempt to leave the streets where their cars are parked, and a neighborhood resident has an emergency. Again, we use Fairmount Avenue as an example. The argument will apply to other neighborhood streets. The model employed is that used by Mao et. al. (Mao, X et al., Optimal Evacuation Strategy for Parking Lots Considering the Dynamic Background Traffic Flows, Intl J Environ Res and Public Health, 2019,16:2194) The model assumes no left turn, no non-motorized or pedestrian traffic, and one car can exit at a time.

Let Q_r = the background traffic flow. Please see appendix for determination of Q_r
 τ_r = minimum time for background traffic to allow exiting vehicle to merge into background traffic. Please see appendix for determination of τ_r
 T_r = average time for two consecutive intervals for car to exit.
 μ_r = average time of arrival in queue. Please see appendix for determination of μ_r .

$T_r = 1 / (Q_r * \exp(-Q_r * \tau_r)) - 1 / Q_r - \tau_r$. $T_r = 6.05$ minutes.

Since the vehicle at the front of the queue can only leave and merge in to the background traffic flow when vehicle headway is greater than the minimum time for background traffic to allow vehicle to exit into background traffic flow, the average time between the intervals is the service time of queueing system.

Let d_r = average queueing time per car.
 $d_r = T_r / (\mu_r T_r - 1) = 41$ minutes.

Numerical simulation, by Mao and colleagues, of evacuation of a parking lot with two exits similar to the exits from the neighborhood streets to Cretin Avenue had average queueing times of 17 minutes and 28 minutes. The simulation assumed no left turns, background traffic flow, and no non-motorized traffic. (Mao et al, op. cit.). With left turns and two way traffic, delays in excess of 28 minutes are reasonable. An analogous situation is that of exiting the Lawson parking ramp at the conclusion of a Minnesota Wild hockey game, an Ordway event, or both. With one way traffic and an adequate driving lane, I have personally experienced exit times of 25 to 35 minutes.

Part II General risk features

A review of literature studying traffic safety identifies several risk features for death and serious injuries. Speeding, reduced visibility, neighborhood environment, human behavior, and congestion are all associated with increased risk for accidents.

The AAA Foundation for Traffic Safety reported that 60% of all fatalities on urban streets occurred at dawn, dusk, or in darkness. Rain and snow were identified as risk features by Andreescu et. al. (Clin Res 1988,9:225). Reduced visibility and adverse weather conditions are common in Minnesota winters. The arena is designated to serve hockey and basketball, primarily winter sports, which will be held during these adverse weather conditions. The current plan identifies on street parking as required to manage the parking demand for events. On street parking increased risk to pedestrians 1.8 times. (Congiu, T. et.al., Sustainability, 2019,11:1014) Greater than 50% of crashes on a college campus were associated with crosswalk signs, pedestrian signals, public transit, and at least 3 location and branding signs at intersections (Dai, D. The Impact of Built Environment on Pedestrian Crashes and the Identification of Crash Clusters on an Urban Campus, W J Emerg Med, 2010, 11: 294). The neighborhood selected by UST has many homes that are nearly or greater than 100 years old. Many of these homes house elderly residents, a population identified as having increased risk. Neighborhoods built before 1970 were associated with a higher frequency of crashes. Higher density of residential homes and minor roads were associated with higher crash frequency of all types. (Asadi, Accident and Prevention, 2022,17:9) In a study of pedestrian crashes, intersections with 4 or more legs were identified as having an increased likelihood of crashes. Please note that the Summit-Cretin and Marshall-Cretin intersections have 4 legs. (Dumbaugh, E. and Li, W., Designing for the Safety of Pedestrians, Cyclists, and Motorists in Urban Environments, J Am Planning Assoc, 2011, 77:1). As reported by Wood, et al. (J Consumer Res, 2011,38:611), "Heavy social drinking is a common and deeply ingrained tradition for both professional and college games that often occurs before the game, during the game (although only in stadiums that sell alcoholic beverages), and after the game. Unfortunately, heavy drinking is associated with many types of risky behavior, perhaps most notably, impaired driving. Game-day drinking, especially, has been shown to lead to increased driving danger." Congestion is linked to speeding and aggressive driving behavior. A pedestrian vehicle crash at 30 mph has a 45% mortality, while a crash at 40 mph has an 85% mortality. (National Center for Health Statistics)

Summary and Conclusions

The proposed arena presents neighborhood specific and general safety concerns. Obstruction of emergency vehicle access to the neighborhood with maximum capacity events is calculated at 41 minutes. American Heart Association guidelines state that for heart attack, door to treatment time goal is less than 30 minutes. For stroke, door to treatment time goal is less than 60 minutes. These guidelines will be impossible to meet under these conditions. The obstruction of emergency vehicle access to the neighborhood as a result of the arena events risks the lives and health of neighborhood residents. General risks include poor driving conditions especially in winter, elderly residents in the older adjacent neighborhoods, traffic congestion, speeding, and alcohol consumption.

The residents of St. Paul can reasonably demand that the City of St. Paul government protect the lives, health, and safety of its residents. Please note that the EAW identified 1 recent death and 3 serious crashes without an arena event. The question that needs an explicit answer is how many deaths, serious injuries, and serious crashes will the City of St. Paul endorse as an acceptable price for an entertainment center in a site without adequate infrastructure to support it. The attendees of arena events may willingly accept the increased risks of the current plan. The residents of the adjacent neighborhoods refuse to accept these additional risks.

Respectfully submitted,
Jerome H. Abrams

Appendix

Determination of Q_r

Calculation of Q_r

Road width ft	30
car speed mph	25
	36.6666
speed ft/sec	7
Sec to traverse road	0.81818
	2
	1.22222
Cars/sec across road= Q_r	2

Determination of τ_r

minimum time of the background traffic to allow vehicle at exit to merge into background traffic was estimated at 5 seconds

Determination of μ_r

Average time to exit Fairmount Avenue to Cretin Avenue was measured on 4/9/2024 from 4:36 PM to 5:30 PM every 1 to 2 minutes. Average time for a left turn was 41.4 seconds. Average time for a right turn was 12.9 sec. An average of 27.1 seconds was used. Data available on request.

$\mu r = \text{average time for individual car to exit} / \text{number of cars parked}$
 $= 0.0369 \text{ sec}$

From: Tom Alf <tompops42@gmail.com>

Sent: Sunday, November 3, 2024 3:43 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: Karen Alf <karen.alf294@gmail.com>; Craig Roen <craig.roen@icloud.com>

Subject: Comment re: Updated EAW (Sept 2024) for UST arena

You don't often get email from tompops42@gmail.com. [Learn why this is important](#)

To: Josh Williams, City of St. Paul, Lead Planner for UST Arena

From: Tom and Karen Alf, 2252 Fairmount Ave, St Paul MN 55105

Date: November 3, 2024

Karen and I wish to support the Comment dated October 30, 2024 related to the Sept 2024 Updated EAW for the UST arena, (see attached document) submitted by Craig Roen, 183 Mount Curve Blvd, St Paul. We encourage the adoption of the attached 3 proposed measures for any game with an expected attendance greater than 1,500 attendees. Fans want free,easy in/out parking.

We respectfully ask the City and St Thomas to add the mitigation strategy or a similar one as outlined in Craig's attached comment.

From: [Michelle Basham](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Cc: [Michelle Basham](#); [Mark Goldberg](#)
Subject: St. Thomas Arena Comment
Date: Wednesday, October 23, 2024 8:29:16 PM

You don't often get email from mbash58a@gmail.com. [Learn why this is important](#)

Greetings,

I am writing to express my strong opposition to St. Thomas' continued efforts to build a large stadium in the middle of our residential community.

This proposal will result in an overwhelming amount of traffic, noise and activity to our community.

Furthermore, I am curious why is the city allowing them to continue construction despite multiple court orders requiring them to stop construction?

Michelle Basham, MPA/ESQ
1887 Montreal Avenue
St. Paul, MN 55116

-----Original Message-----

From: Gayle Breutzman <gayle151pa-c@comcast.net>

Sent: Thursday, October 31, 2024 2:08 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Subject: UST Multipurpose Arena 2024 EAW Update

[You don't often get email from gayle151pa-c@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Gayle Breutzman
151 Woodlawn Ave
St. Paul, MN 55105
gayle151pa-c@comcast.net

October 31, 2024

Mr. Williams,

An Environmental Assessment Worksheet (EAW) was published for public comment July 2023. The Responsible Governmental Unit (RGU) for the project is The City of Saint Paul. The RGU declared September 26, 2023 that the proposed arena did not require an Environmental Impact Statement (EIS). That EAW was appealed to the Minnesota Court of Appeals which found the EQW deficient in several areas (see below). The University of St. Thomas then petitioned the Minnesota Supreme Court re: The City of St. Paul's Decision on the Need for an Environmental Impact Statement for the Proposed University of St. Thomas Multipurpose Arena. On October 15, 2024 the State of Minnesota in Supreme Court "Based upon all the files, records, and proceedings herein," denied further review of the petition in case A23-1656.

The Minnesota Court of Appeals stated in No. A23-1656 Re: City of Saint Paul's Decision on the Need for an Environmental Impact Statement for the Proposed University of St. Thomas Multi-Purpose Arena:

"Yes, the negative declaration (on the need for an Environmental Impact Statement) was arbitrary and capricious and not supported by substantial evidence."

Specifically, the Decision stated:

- I. The EAW is legally deficient because its analysis of potential environmental effects addresses only the construction of the proposed Arena and fails to even consider the "cumulative impact" and "cumulative potential effects" of the ongoing and proposed development on the University's South Campus, as required by law.
- II. The City's negative declaration on the need for an Environmental Impact Statement was arbitrary and capricious and is not supported by substantial evidence because the record demonstrates the project has the potential for significant environmental effects.
- III. The City's proposed mitigation is insufficient as it is not specific, targeted, and certain to be able to mitigate the environmental effects.

As stated by the Environmental Quality Board (EQB) in its 2010 Guide To Minnesota Environmental Review Rules: "The EIS is reserved for projects with the potential for significant environmental effects." As per the 2024 EAW Update, the project now encompasses an area of 11.7 acres in the Mississippi River Corridor Critical Area (MRCCA) whereas the 2023 EAW site was only 6 acres. The Total Project Acreage listed in Table 1(Project Magnitude) of the 2024 EQW Update does not include the proposed St. Paul Seminary Parking Lot. If the parking lot acreage is not included in the project magnitude, have the the effects of the site actually been evaluated? The 2024 EAW Worksheet Update for the UST Arena and phased projects is arbitrary and capricious. Without question, he phased projects now require an Environmental Impact Statement as defined by the EQB.

As a project located in the Mississippi River Corridor Critical Area, there will be extensive environmental impacts including soil erodibility, heat island effect, use of hazardous materials with potential for leakage, increased greenhouse gasses (GHG), decreased number and maturity of trees, and drainage of chloride into the Mississippi River. All of these factors will negatively affect the environments of the wildlife, plants and people in the surrounding area.

Chemicals released into water move downstream and affect aquatic life in distant areas. Air from increased GHG's moves with air currents and affects entire neighborhoods and cities. The environmental effects of the St. Thomas Arena are many. As in the 2023 EAW, the September 2024 University of St. Thomas Multipurpose Arena Environmental Assessment Worksheet Update (as required by the Minnesota Court of Appeals) does not sufficiently address the environmental risks inherent in the phased project and, in some cases, is in error. An Environmental Impact Statement needs to be provided to address the significant environmental effects of the proposed arena.

ENVIRONMENTAL

1. Urban Heat Island

The Arena and the proposed SPS parking lot will act as an urban heat island as, per the updated worksheet: Surfaces and structures such as roads, parking lots and buildings absorb and reemit more heat from the sun than natural landscapes. During a heatwave (not precisely defined in the worksheet), the site is susceptible to extreme heat. As the temperatures of the climate continue to rise, the Urban Heat Island effect will become more frequent and pronounced, causing increased electricity demand for air conditioning by 1-9% for every two degree increase in temperature (per the EPA. The EPA also states that “during extreme heat events, which are exacerbated by heat islands, the increased demand for air conditioning can overload systems.” Companies that supply electricity typically rely on fossil fuel power plants to meet this demand, which in turn leads to an increase in air pollutant and greenhouse gas emissions such as ground-level ozone, fine particulate matter, acid rain, and carbon dioxide (which contributes to global climate change).

High temperatures of pavement and rooftop surfaces can heat up stormwater runoff, which drains into storm sewers and raises water temperatures as it is released into rivers (the Mississippi River). Page 35 of the 2024 EAW Update states that the plan is to “Discharge building roof water to the Grotto in lieu of surface parking lot, since building roof water is relatively clean compared to site water which often contains salts and sediments.” It may be cleaner, but it will also be warmer. Rapid temperature changes in aquatic ecosystems resulting from warm stormwater runoff can be stressful or fatal to aquatic life.

In Table 2: Climate Considerations and Adaptations; landscaping via shade trees is listed as one of the mitigation solutions UST will employ. In Table 5: From all phases of development, 193 trees will be removed and 127 planted. The addition of the Schoenecker Center phased development has changed the number of trees removed by 65.

This drastic loss of mature trees has significant environmental effects, because trees improve air quality through three key impacts:

- Altering the concentration of pollutants by reducing air temperatures.

Reducing energy consumption of buildings (particularly for temperature control), which in turn reduces the consumption of energy from polluting sources (such as fossil fuels).

- Directly removing sulfur dioxide, nitrous oxide, carbon monoxide, ozone and particulate matter.

With the extensive addition of the phased project acreage, the fact is that fewer trees can be planted secondary to the extensive hardscape (the Ryan Company Site Plan of the arena lists concrete pavement 60,696 square feet). That square footage does not include the arena building, the Schoenecker Center, the St. Paul Seminary (SPS) Parking Lot, and the additional sidewalks and roadways. The hardscape will exacerbate the heat island effect, which is barely mentioned in the 2024 EAW Update for the phased arena project.

The updated worksheet states that the stormwater facilities will improve water quality and stormwater runoff. How? What will be filtered from the water before it flows back into the Mississippi? Will it cool the runoff or remove the chloride from the salting of the sidewalks, roads and parking lots? And now there will be an additional parking lot on the Mississippi River Boulevard. How will that drain? It will likely drain into the Mississippi River through existing storm drains. Why aren't all of the paved areas in the project permeable? The updated EAW worksheet inadequately mitigates the heat island effect of the phased development. An Environmental Impact Statement is required.

Chloride (salt/deicing) Reduction

Per the MPCA Chloride Reduction Model Ordinance (Language) from, 2019, chloride is easily transmitted into lakes, streams and groundwater, and threatens drinking water supplies, as well as the health of freshwater fish and other aquatic life. There are several chloride-based deicers used roads and walkways, notably sodium chloride (NaCl), magnesium chloride (MgCl₂) and calcium chloride (CaCl₂). These deicers are sometimes generally referred to as "salt". It takes only one teaspoon of salt to permanently pollute five gallons of drinking water. Once in the water, there is no easy way to remove the chloride.

The impacts of chloride contamination include:

1. Drinking water: 75% of Minnesotans rely on groundwater for drinking water. 27% of monitoring wells in the Twin Cities metro area had chloride concentrations that exceeded EPA drinking water guidelines.
2. Fish and aquatic bugs: High amounts of chloride are toxic to fish, aquatic bugs and amphibians. Even at lower levels chloride can cause negative effects.
3. Increased corrosivity in drinking waters: elevated chloride can increase corrosion in distribution systems and can increase the rate of release of lead into water.
4. Plants: Chloride in streams, lakes and wetlands harms aquatic vegetation and can change the plant community structure.
5. Soil: Soil concentrated with salt can lose its ability to retain water and store nutrients which can result in an increased risk of erosion and sediment runoff (which also harms water quality).
6. Wildlife: Some birds (finches and house sparrows) can die from ingesting deicing salt.

The 2019 Statewide Chloride Management Plan states that winter maintenance activities are a primary source of chloride discharges into lakes, streams, wetlands and groundwater. The UST arena development, alone, will have 60696 square feet of concrete pavement. Again this square footage does not include the additional concrete pavement of the phased project buildings, sidewalks and roadways.

The current EAW has not addressed the deicing (chloride) protocol regarding the proposed arena. As a phased project, the Schoenecker Center must be included. Areas to be addressed include:

1. Occupational Licensure for Winter Maintenance Professionals (certification in MPCA's Smart Salting program in order to operate within their jurisdiction).
2. Deicer Bulk Storage Facility Regulations.
 - Provide indoor operations for storage of deicing materials to prevent such materials from being affected by rain, snow and melt water.

- Storage facility must be located outside of floodplains and (distance to be decided) from lakes, rivers, streams, ditches, storm drains, manholes, catch basins, wetlands and any other areas likely to absorb runoff. A facility must not be located in significant proximity to surface water features, water supplies, wells or dry wells. The Mississippi River is 1/4 mile from the arena site.
 - The property slope must be away from the facility's salt, deicer and sand storage area.
 - Salt vulnerable/intolerant natural areas should be avoided as storage facilities to the extent possible. Where they cannot be avoided, specific measures should be instituted to prevent damage natural areas including (but not limited to):
 - * Areas with salt sensitive vegetation.
 - * Areas serving as a source of drinking water (surface and ground water).
 - * Areas with bodies of water with low dilution, low volume or salt sensitive species.
 - * Areas associated with ground water recharge zones or shallow water table, with medium to high permeable soils.
3. An applicant for a permit for land-disturbing activity on property other than individual single-family home sites must provide a plan for post-construction management of chloride use on the site (see MPCA smart salting requirements). This permit is not requested in the Updated EAW worksheet.

With the proposed project in an Minnesota River Critical Corridor, surrounded by neighborhoods, with liquid runoff into the Mississippi River via direct runoff, storm sewers or the grotto, the amended UST arena EAW must address the issue of deicing (chloride use). Currently, the arena will be utilized during winter and spring months, when the most deicer will be used. The amended EAW must include:

1. What deicer will be used?
2. How and where will the salt/deicer be stored?
3. What specific mitigation practices will be used to protect the plants, animals and water that will be exposed?
4. Who will monitor chloride levels in soil and water? How will it be reported and to whom?
5. What specific actions will be taken if chloride levels are above safe levels?
6. Will soil and water samples be tested before the arena opens?

Contamination/Hazardous Materials/Wastes

The updated EAW Worksheet states that glycol will be used in the chiller cooling coils and ammonia will be used for refrigeration for the ice rinks. Both ethylene glycol and anhydrous ammonia are hazardous and toxic substances and are listed as such with (among other federal agencies) DOT, NIOSH and the EPA. Both are on the Right to Know Hazardous Substance List.

On Page 38 the worksheet states that there will be a 500 ton chiller that will hold "approximately 800 pounds of refrigerant and a 112 ton chiller that will hold ~137 pounds of refrigerant. The chilled water piping system will have approximately 4000 gallons of a fluid that is 30% ethylene glycol and 70% water. For the ice rink cooling system there is to be approximately 1,200 pounds of ammonia and ~6,000 gallons of fluid that is 40% glycol and 60% water. "

Anhydrous ammonia is highly toxic to humans, with inhalation potentially causing respiratory failure, skin or eye irritation, freezing injuries, unconsciousness and death. Ammonia reacts with moisture in mucous membranes to produce ammonium hydroxide, a corrosive alkaline compound. Failures in welds valves, piping, hoses or compressor shaft seals are not infrequent in ice rink chiller systems, as many parts of the refrigeration system contain ammonia liquified

under pressure (anhydrous ammonia). Ammonia is a strong base and will corrode galvanized metals, cast iron, copper brass or copper alloys.

The Emergency Planning and Community Right-to-know Act (EPCRA) was passed in 1986 in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. Chris Parnell, CHMM/ EPCRA Program Administrator for Homeland Security and Emergency Management at the Minnesota Department of Public Safety provided information that places the ammonia quantity of 1200 pounds for the ice rink cooling system in the EPCRA Section 302, 312, 304 and release reporting categories. This requires UST to notify its state emergency response commission and also requires participation, as necessary with the local emergency planning committee in the local emergency planning process. These legal requirements are not noted in the updated EAW Worksheet. They must be included, specifically, for public knowledge and safety.

Marnie L. Prochniak, Supervisor for Workplace Safety Consultation at the Minnesota Department of Labor and Industry stated that the university of St. Thomas is required by Minnesota OSHA statutes 182.653 to develop and use a formal safety and health program, known as an Employee Right to Know program along with documented training on both for all employees exposed to anhydrous ammonia and ethylene glycol. These specifics are not included in the new EAW Worksheet, but must be in writing to insure that the University will comply with Minnesota State Statutes for the safety of their staff and the many neighborhood residents and students that could be affected if an accident or leak with either of these chemicals occurs.

Visual

MRCCA Plan Policy CA-10: Regulate building height, placement and design consistent with the intent of the MRCCA rules to protect, enhance and minimize impacts to public river corridor views (PRVC's).

MRCCA Plan Policy CA-11: Protect and minimize impacts to public river corridor views from public development activities.

The revised EAW worksheet for the arena notes the changes in views from the arena site to be "most noticeable from portions of Goodrich Avenue and from the Grand Avenue right of way." The concrete walls of the arena now obliterate any view of the MRCCA from view when driving west on Grand Avenue. The view from Goodrich Avenue is, again, the view of a concrete wall. The spaces that used to exist between buildings that provided some view of trees and landscape have been razed. The views now are sterile and cold. The dramatic changes in the views from the arena could have only been foreseen by an architect, not by a layperson who now sees the tall, stark walls of the concrete arena when they walk or drive north on Goodrich or west on Grand. The trees native to the site were removed and will not be replaced in the same numbers because of the endless asphalt. Also, because of the increased parking demand, there is a parking lot proposed to be built on the east side of the Mississippi River Boulevard. Another area of asphalt (not listed in Table 1: Project Magnitude) that will remove natural vegetation and degrade the scenic view to any person driving, walking or bicycling along the Mississippi River Boulevard. The EAW language attempts to downplay the change to the views, but the changes are absolutely NOT in character with the Mississippi River Corridor Critical Area intentions to protect the areas natural, cultural and scenic resources.

Traffic, Parking and Mitigation Strategies

1. Parking

As in the original UST Arena EAW, the parking facts have been underestimated and were misrepresented. The updated EAW notes the 365 parking spaces were removed for arena construction and adds 73 parking spaces “if the Saint Paul Seminary (SPS) Parking Lot project is completed”. As the SPS parking lot would be on seminary property and is owned by the St. Paul Seminary (as stated on page 7 of the current updated EAW Worksheet) those 73 parking spaces cannot be included in the arena parking estimates as they are for the seminarians. Limiting seminarians and students or staff that have paid for parking in the SPS or Morris Parking Lots to make room for arena attendees is inequitable. The updated EAW Worksheet states that the “total pre-event peak hour generates approximately 1,498 trips and post-event peak generated approximately 1581 trips.”

A vehicle trip is defined as “a movement by one or more person in a motor vehicle that begins or ends at a particular location.” The 2023 SRS Transportation study used an auto-occupancy of 2.7. The Federal Highway Administration uses an Average Vehicle Occupancy (AVO) of 1.7.

Number of Vehicles by Attendance and Average Vehicle Occupancy (AVO) (including 20 percent reduction for pedestrians, bicyclists)

<u>Attendance Range</u>	<u>Number of Cars, AVO=2.7</u>	<u>Number of cars, AVO-1.7</u>
5500-4500	1630-1333	2588-2118
4500-3500.	1333-1037	2118-1647
3500-2500	1037-741	1647-1176
2500-1000	741-296	1176-471
<1000	<296	<471

If the AVO of 2.7 is used to determine parking need (per Table 3 in the Transportation Addendum), any Thursday/Weeknight event with an attendance above 2450 persons will have a parking deficit. Friday Night events with over 3475 attendees will have a parking shortage. Saturday Night events with over 3620 attendees will have a parking deficit. In total, there will be 20-21 events per season with a parking deficit (in contradiction to the EAW Update Addendum which states that there will be 12 games with a parking deficit per season).

If the AVO of 1.7 is used, any Thursday/Weeknight event with an attendance over 1212 persons will have a parking deficit, as will Friday Night events with attendances over 1553 persons and Saturday Night events with attendances over 1619 persons. Parking deficits using the FHA average vehicle occupancy value of 1.7 would show a parking deficit for at least 31 games per season (conservative estimate). Again, this contradicts the 12 games per season with a parking deficit stated in the 2024 Transportation Addendum to EAW for the arena.

Table1: Available Parking Supply Comparison on Page 3 of the 2024 EAW Transportation Analysis Update Addendum shows 1084 total unrestricted parking spaces on the UST Campus. The surrounding neighborhood is designated for 369 total unrestricted parking spaces weekly (page 55 of the 2024 EAW Update states “Since on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum, the review was focused on the visitor parking facilities, as these are the facilities expected to be used for events held in the Arena.”) If that is true, why does Table 3 (Available Parking Supply Before Events) in the 2024 Transportation Addendum include unrestricted neighborhood spaces?

Furthermore, if on-street parking utilization was not collected for the update, the Transportation Addendum for parking is not complete, or accurate. How did the study arrive at 369 unrestricted residential spaces? The total of 1453 parking spaces cannot be confirmed. It must be noted, in addition, that many of the neighborhood parking spaces are restricted until 8:00 PM on weekdays. Events on weekday and on Friday or Saturday evenings start earlier than 8:00 PM. Unless UST is condoning their event attendees to park illegally, this must be factored into the parking availability numbers. Currently, for women's soccer events (with minimal attendance numbers), there has been considerable illegal parking on neighborhood streets. Why? Because the residential parking spaces are closer to the event location. In cold Winter and Spring months this illegal parking increases as attendees want to walk the shortest distance possible in the cold to attend their event. Illegal parking on residential neighborhood streets with permit parking restrictions is pervasive and has little to no enforcement by UST or non-emergency police parking enforcement. This has not been addressed in the 2024 Arena EAW Addendum. Illegal parking in the residential neighborhoods surrounding the University of St. Thomas must be addressed with **specific** mitigation measures, including ticketing and towing in a specified period of time. As this mitigation issue is not specifically addressed in the 2024 EAW Update Addendum, the EAW is not complete.

2. Parking Mitigation

The mitigation strategies in the 2024 EAW Update are, again, suggestions. The EAW must have mitigation strategies completed. The 2024 Worksheet Update states that, "When purchasing an event ticket, attendees would also select their choice of transportation to an the event. That is not a specific mitigation strategy. The "Estimated Parking Demand Reduction" numbers are estimates, as stated, not fact. None of the following mitigation strategies are specific:

- "Work with Metro Transit will offer free transit pass options with the purchase of event tickets." How many attendees will use this option? Are extra busses running around arena event schedules? At what frequency do the buses run?
- "Pursue a partnership with a ride share company to provide discounted rates for event ticket holders." What ride share company has been enlisted to provide discounted rates for ticket holders? What is be the discounted rate?
- "Pursue a collaborative partnership with one or two restaurants and/or bars to offer shuttle services." What restaurants are providing shuttles to events? How many attendees use restaurant shuttles? What size will the "shuttle" be?
- What are the event thresholds for off-site parking/shuttle services? Where will the off-site parking and shuttles be located? How frequently will they run and what will be the times of service? Will the shuttle service be included in the price of a ticket? Will buses be used? A typical coach bus can seat 44-49 people.

One of the listed mitigation solutions in the 2024 EQW Transportation Analysis Update Addendum is the plan "to reduce resident parking permits for first and second-year students in Level 2 of the Morrison Hall Parking Ramp. UST **anticipates** that when these permits are reduced, students without permits will refrain from bringing their vehicles to campus; however, this will need to be monitored." Again, another suggestion by UST that is not specific mitigation. Who will monitor the student parking in residential areas? Students already use residential streets as parking for cars and homeowners are unable to get these cars removed by UST or the police. UST has no specific mitigation plan to address student parking in permitted residential areas, a problem that will only increase as UST uses parking ramp spaces for arena attendees instead of students. The students and employees of UST should be

prioritized for UST on-campus parking, as education of students is a part of UST's designation as a nonprofit.

Appropriate Mitigation Procedures would include:

-It is acknowledged that there is a probability that some attendees may attempt to park for free in the surrounding neighborhoods and walk to the arena. As a part of the Traffic Management Plan (TMP), a traffic monitoring program would be developed that would include surveys of on-street parking spaces in the surrounding residential neighborhood during different types of events and on non-event days. If it is determined that project-generated vehicles are parking off-site in the surrounding neighborhoods on a recurrent basis, Saint Paul area police must coordinate with areas from being impacted any parking demand generated by arena events. Potential mitigation measures would include strict enforcement of existing parking regulation by ticketing and/or towing illegally parked vehicles, or by implementing new parking regulations on the streets in the surrounding areas.

-Pre-paid parking assignments must be sold with tickets and enforced, until lots are full, otherwise event attendees will park as close to their destination as possible (the neighborhood streets) for free.

-Reserved parking permits can be issued based on the amount tickets purchased (e.g., one parking space per every four tickets purchased). Discounts could be provided for arena attendees that arrive and park on-site early, with additional discounts for large carpools. This would also reduce attendee confusion and greenhouse gas emissions by guaranteeing a parking spot in a specific location.

-Recommended driving directions and parking locations could be given to attendees when purchasing tickets, helping to minimize congestion and circulation in trying to find parking spaces, reducing greenhouse gases.

-Increase bus services to accommodate bus rider trips made by arena patrons. Increases in service would be coordinated with the MTC as a part of the Traffic Management Plan(TMP) For the arena.

-Increase frequency of UST inter-campus shuttles, especially on weekends and evenings of events. Designate parking for patrons using the inter-campus shuttles.

-For major events with high expected attendance levels, social media services such as Facebook and Twitter/X could be used to recommend that arena patrons carpool, arrive early and/or use public transportation.

3. Traffic Management Plan (TMP)

As a part of the proposed project, a comprehensive Traffic Management Plan (TMP) must be developed that would include a traffic monitoring program that could be used to determine the extent to which traffic diversions may occur as a result of traffic congestion caused by project-generated vehicle trips. Before the opening of the arena, the scope of work for the program must be developed. The scope of work must include collecting several types of field data (e.g., Automatic Traffic Recorder (ATR) counts along Cretin Avenue and at major roadways in the local street network, turning movement counts and field observations at key intersections, vehicle occupancies, on- and offsite parking utilization and/or transit ridership. Surveys of arena patrons to understand their origins, and destinations and the travel characteristics used by attendees in traveling to and from different types of events must be conducted. The TMP would help identify the transportation demand management measures and operational strategies that would be most effective and those that are not, thus enabling continued improvement for the TMP on a regular basis and allowing it to adapt to reflect actual conditions. If it is determined that such traffic diversions are occurring on a recurrent basis at unacceptable levels, potential mitigation measures to address such impacts would involve refinements to the TMP. The TMP would be reevaluated by the University of Saint Thomas on an annual basis in conjunction with community advisory councils, the Minnesota Department of

Transportation, St. Paul Police, and parking enforcement personnel and surveys, including residents of neighborhoods within 0.5 miles of UST.

4. An on-site event transportation coordinator must be included as a part of the arena project to coordinate and manage the TMP. The transportation coordinator would be responsible for coordinating traffic, parking, transit, pedestrian and/or shuttle bus operations on or around the site. This person would also coordinate with transportation agencies, public safety organizations, parking and shuttle bus operators, and/or ride share operators to ensure the effective implementation of the TMP. In addition, the on-site event transportation coordinator would be responsible for daily monitoring of other key local streets of concern to the community with regard to volume changes and congestion.

Since the original 2023 EAW, the University of St. Thomas has joined the National Collegiate Hockey Conference (NCHC) and will be a full-time member beginning with the 2026-27 season. The NCHC Website states that, in 2026, the NCHC will move its playoffs to a three-week tournament held entirely on campus sites. The NCHC Website states that the Anderson Arena will be “state-of-the-art” and will have three visiting team locker rooms and full student-athlete support services. It must be expected that UST plans to host (at least a part of) this tournament at the arena. As NCHC Commissioner Heather Weems was quoted in the 5/15/24 NCHC Website article as stating, “The window of opportunity arose quickly, and we worked efficiently with our Board of Directors, Athletics Council, and the University of St. Thomas to achieve expansion.” She goes on to thank St. Thomas President Rob Vischer and Vice President and Director of Athletics Phil Estes “for their vision and investment in hockey.” The Transportation Addendum includes 6-9 additional Men’s Hockey games with attendance assumed to be maximum capacity. This additional data, in itself, makes the 2023 EAW Transportation Study and, therefore, the 2024 addendum invalid. New traffic and transportation studies need to be mandated to address the updated numbers of what will be year-round use of the arena, with more events and higher attendance numbers. The 2024 Transportation Analysis Update Addendum lists events that were not listed in the 2023 EAW including six USTj Commencement sessions in May (maximum attendance), High School Commencements May and June, external events and Club Room rentals. Keeping a list of events, including non-sporting events (which have barely been mentioned), and notifying residents is not mitigation.

The UST arena phased project is creating an ever-increasing number of environmental and social effects that will have longstanding ramifications on UST students, neighborhood residents and, most importantly, the MRCCA. The number of events and attendees, square footage of asphalt, number of mature trees removed, chloride usage, greenhouse gas pollution and heat island effects will be increased, and the environmental effects have not been addressed completely in this 2024 EAW Worksheet Update. The 2024 EAW Addendum is incomplete in addressing the effects of known (and probable) future events. The University of St. Thomas is arbitrary and capricious in its 2024 EAW Worksheet Update for the University of St. Thomas Multipurpose Arena. An Environmental Impact Statement, including new transportation and traffic studies are required to factually and completely address environmental impacts of the phased project.

Respectfully Submitted,

Gayle Breutzman

From: [Kathy Brudevold](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: University of St Thomas Arena EAW comments
Date: Thursday, November 7, 2024 12:19:57 PM

You don't often get email from kathy@brudevold.com. [Learn why this is important](#)

Josh Williams, Principal Planner
25 West Fourth Street
StThomasArena_EAW@ci.stpaul.mn.us

We are writing to voice our concern about the University of St Thomas arena construction. We live in the neighborhood and are concerned that the arena with its projected parking and traffic impacts is too big for our small neighborhood. We are additionally concerned that the UST EAW submission does not sufficiently describe the issues nor does it provide convincing solutions.

Our main concerns:

- 1) It appears that the UST arena does not meet the height and setback limitations. Permits should not have been approved.
- 2) Construction should not be allowed to continue until there is an approved EAW and EIS, if also required.
- 3) Traffic and Parking

We live at 2208 Sargent Ave, 3 blocks directly south of the south campus. At present, street traffic reaches maximum capacity regularly. Cretin Ave is not built for the capacity it currently carries. How can one reasonably expect it to accommodate up to 5500 event attendees arriving either by vehicle or on foot. The intersection of Cretin and Grand is totally inadequate to process the quantity of vehicles and foot traffic projected. Emergency vehicles will have no chance to navigate – there is absolutely no space to allow them emergency access.

Student parking on neighborhood streets continues to increase as less housing is available on campus. Additionally, the trend toward duplexes and other dwellings that can house up to 12 occupants fills streets with cars on a daily basis. (example— Goodrich Ave from Cretin to Finn) Many streets have resorted to permit parking in order to park near their homes, and there are more permit parking requests to come.

EAW traffic and parking projections appear not to recognize the Arena traffic and parking to be an added burden to already existing traffic and parking. Vendors, arena staff, and additionally campus employees and staff when asked to move out of ramp parking, etc will need to access neighborhood parking. All traffic and parking must be included in mitigation projections. Mitigation plans must provide for maximum capacity scenarios.

EAW does not include a projection of number of events to be hosted in the Arena. Rental use of the Arena has the same traffic and parking impacts on the

neighborhood.

The annual Halloween Block trick or treating event on Sargent Ave is a good example of the realities of event parking. Parking is crazy as vehicles navigate narrow streets to find parking. Oncoming cars cannot pass each other on the narrow streets with parked vehicles on either side. Cars are parked across street facing driveways. Add snow and you have an impossible situation. This is a fun once a year event but too much to ask of a neighborhood on a regular basis.

Impact on neighborhood quality of life is not recognized in the EAW. Traffic and parking for UST students are already issues for the neighborhood. And now UST is handing to the neighborhood the burden of parking that they are failing to provide for their own event attendees. And the events are bringing in a level of traffic and parking that our neighborhood is not designed to handle.

Kathy and Dave Brudevold
2208 Sargent Ave
St Paul, MN 55105

From: Terrance Brueck <terry.brueck@gmail.com>
Sent: Friday, November 1, 2024 10:59 AM
To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>
Cc: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>; #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>
Subject: UST Arena EAW: incomplete and insufficient in addressing environmental impacts

To whom it may concern:

The impacts of the arena stated in the EAW are incomplete and insufficient to address the full environmental impacts and an Environmental Impact Statement (EIS) is required. The impacts are not just theoretical or hypothetical, they are real as shown by the impacts of fall weekend football games at the nearby UST stadium of similar capacity to the arena.

I live on Summit Avenue across from the arena site and witness the current safety hazards on Mississippi River Boulevard (MRB) on Saturday football game days. Parked cars on MRB between Summit and Cretin Avenues required traffic going north on MRB to cross the yellow lines into oncoming traffic. This requires cars to swerve into the bike lane on the river-side of MRB in order to pass each other. The result is no room for cyclists in either direction without halting traffic flow or causing deadly collisions! Even without bicycle riders on the road, other large vehicles, trucks and buses cause traffic gridlock and/or collisions. The risk to human life is also significant with people (attending the games) getting into and out of parked vehicles with the restricted traffic lanes.

The impact of the arena on this currently known safety hazard will be no different or worse! The arena is just as close to this traffic congestion area as the football stadium, meaning parked cars for arena events will cause similar or worse outcomes. With wintertime snow conditions of curb pile-ups causing even more restrictions on road traffic lanes, the impact on vehicle traffic and pedestrian safety will be more extreme!

The environmental impacts from wintertime conditions (due to more vehicle emissions with idling cars warming their occupants), as well as the pedestrian safety impacts **have not been addressed at all in the previous or new EAW**. Similar issues will undoubtedly be present in other adjacent or nearby streets to the arena site. Snow and ice mitigation around and near the arena site will also increase the use of road salt that impacts runoff to the Mississippi River environment. Snow conditions will also cause less availability of on-street parking, which will worsen the environmental impact of cars cruising the nearby neighborhood streets to find parking for arena events. No traffic management plan will lessen the desire to drop off event attendees and drive around nearby streets in search of parking spots. These seasonal variations will cause additional environmental impacts with snow and ice removal (added emissions of trucks, snowblowers, etc), as well as the salt runoff of snow melt to the river bluff and river gorge.

These significant environmental impacts of the arena as well as many others must be addressed

in a full EIS.

Thank you for your attention and actions,

Terrance M. Brueck
2279 Summit Avenue

From: Terrance Brueck <terry.brueck@gmail.com>

Sent: Wednesday, November 13, 2024 4:03 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>; #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>

Subject: Re: UST Arena EAW: incomplete and insufficient in addressing environmental impacts

Some people who received this message don't often get email from terry.brueck@gmail.com. [Learn why this is important](#)

UST football parking on MRB last Saturday....





From: [John Cavanaugh](#)
To: [*Cl-StPaul_StThomasArena_EAW](#)
Cc: [Melvin Carter](#); [#Cl-StPaul_Ward4](#); [#Cl-StPaul_Ward3](#)
Subject: St. Thomas Arena EAW by City of St. Paul
Date: Thursday, November 7, 2024 3:32:52 PM

[Some people who received this message don't often get email from jjosephcavanaugh@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Greetings,

I was a resident of the Merriam Park neighborhood for over 10 years before moving to Maplewood and in those years living near the University of St. Thomas, I considered the institution an asset to the area. The concern raised by ARD and the immediate neighborhood around the University of St. Thomas has generated much ado about the Lee and Penny Anderson Arena over issues about parking and pollution by increased traffic, environmental harm, pedestrian crossing issues etc. After reading through the amended EAW, I do not see any further concern over the issues raised by ARD for the following reasons:

1. Air Pollution caused by increased car traffic: the MPCA has a standard of how much traffic results in significant air pollution and the proposed traffic does not rise to the level of concern.

2. Environmental concerns: the building is working toward LEED Silver Certification like its newest dormitory and will not impugn the environment.

3. Attendance figures: Much concern was raised about the arena's capacity and the parking issues to accommodate any crowd that meets full capacity. The university has made plans for that. The basketball arena will hold around 5,000. In the last two years, the current Schoenecker gymnasium has not reached maximum capacity of 1,800 and the possibility of reaching the proposed capacity of 5,000 may only occur a few times and UST has made arrangements to handle that occasion if it arises. The projected attendance for hockey (4,000) is below the number of fans that attend the university's football games and there has been no opposition to those numbers. The Summit League is spread across the Midwest and game rivalries do not exist to the extent that will be a regular likelihood.

I believe the ARD's complaints are rooted in NYMBYism and they have been throwing any concern opposed to the construction in their lawsuit in an attempt to find something that will stick. I believe the amended EAW addresses all the concerns adequately.

John Cavanaugh, Maplewood MN

From: [Joel Clemmer](mailto:Joel.Clemmer)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: University of St Thomas arena EAW
Date: Thursday, November 7, 2024 12:48:05 PM

You don't often get email from joel@joelclemmer.org. [Learn why this is important](#)

November 7, 2024

Dear Sir or Madam:

The revised Environmental Worksheet for the University of St Thomas's arena project is inadequate and a full Environmental Impact Statement is required.

The Court of Appeals stated that UST must provide "specific, targeted, and certain" mitigations to the environmental issues. The Court also demanded that UST address all parts of the phased South Campus development.

Just looking at traffic considerations alone reveals numerous inadequacies. UST:

- has not considered traffic from the new Schoenecker performance space;
- has not considered daily use of other new buildings on South Campus nor other development in the area, such as Highland Bridge;
- has never produced the promised Event Traffic Management Plan yet refers to it as a mitigation;
- provides no prevention nor mitigation for the admitted 505 parking space shortage for maximum capacity arena events other than parking in our neighborhood;
- vaguely points to an off-site parking capability in reference to the above, in spite of no such capability having been developed after two years.

Similar inadequacies are found in other areas under consideration.

Clearly, the University of Saint Thomas's revised EAW fails to meet the specifications of the Court and so an Environmental Impact Statement is needed.

Sincerely,

Joel Clemmer
2154 Fairmount Avenue
Saint Paul, MN 55105
joel@joelclemmer.org
651 442 7639

From: Flannery Delaney <flannerydelaney@hotmail.com>

Sent: Friday, November 1, 2024 10:50 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>

Subject: UST arena

Some people who received this message don't often get email from flannerydelaney@hotmail.com. [Learn why this is important](#)

Josh Williams,

There is so much to say about why the EAW is inadequate and so many reasons that an EIS should be required of this project. I know you will get a lot of thoughtful feedback that will consider the inadequacies of the EAW with detail to back this up. I am just going to say too big, wrong location, not enough parking. We are

Pleading with you to reconsider what this arena will do to our neighborhood. As neighbors with UST we are asking for a compromise that strikes a balance with a healthy, vibrant neighborhood and D1 athletics.

Please pause the construction until an EIS is completed so that we can all be confident that the carbon emissions, traffic, Mississippi River, and the neighborhood were considered. What does the city have to lose by requiring an EIS?

Thank you for your consideration.

Flannery Delaney
2126 Lincoln Avenue

Get [Outlook for iOS](#)

From: [JOHN D DELL](#)
To: [*Cl-StPaul_StThomasArena_EAW](#)
Cc: [Melvin Carter](#); [#Cl-StPaul_Ward4](#); info@advocates4rd.org
Subject: Comment to the updated environmental assessment worksheet for St. Thomas's arena.
Date: Wednesday, November 6, 2024 2:03:48 PM

Some people who received this message don't often get email from johndelljohndell4518@msn.com. [Learn why this is important](#)

John and Virginia Dell are long-term residents at 2248 Goodrich Avenue, St. Paul, MN 565105. We offer the following comments on St Thomas' EAW:

Living directly across from the arena, a major concern is the use of toxic refrigerants for the cooling system and the large ice rinks. The Current EAW does not adequately address the refrigerant and possible spills or leaks from the miles of piping for ethylene glycol to keep the rinks frozen (No PCA-approved safeguards). The other refrigerant is not identified so one questions how the environmental assessment can be done without specifying the chemical that will be used.

The current analysis is for parking for basketball and hockey only, Analysis does not include concerts conventions or other arena uses. An EAW is needed to include the full extent of UST's usage throughout the year.

Parking, traffic, pollution have all been under estimated.

For these and many more factors, we consider **EAW is incomplete and insufficient in addressing the environmental impacts of UST's construction, and that an EIS is therefore required.**

John and Virginia Dell
2248 Goodrich Avenue
St. Paul, MN 55105

From: [John Dittberner](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: UST Arena Revised EAW Public Comment
Date: Thursday, October 24, 2024 9:05:01 PM

[You don't often get email from john.dittberner.1@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To Whom It May Concern,

I believe the revised EAW for the new UST arena in St. Paul still falls short of satisfying the best interest of the residents of the city and skirts the intent of requiring an EAW in the first place. It is heavily and unreasonably skewed in favor of UST, and the changes are generally reworded vagaries from the original EAW with very little meaningful or substantive change. The mitigation measures suggested are not adequate nor is there any mechanism for accountability against UST if the EAW fails to reasonably assess all potential impacts.

I believe construction should be suspended until an adequate EAW is developed and executed. The burden of inadequate foresight regarding the EAW will be borne by the residents of the adjoining areas and the taxpayers of St. Paul, not by UST or its patrons.

Sincerely,
John Dittberner
1630 Beechwood Ave
St Paul

From: [Julia Stein Dittberner](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: UST Arena
Date: Thursday, October 24, 2024 5:17:33 PM

[You don't often get email from jsdittberner22@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To Whom It May Concern,

I have grave concerns about moving forward with construction on the UST Arena without completing an environmental study. I fear if we wait much longer even if the study comes back against proceeding with the arena as planned UST will have come so far on construction that demolition/revision will cause greater negative impact than halting/amending construction. Thus, the study will become moot. It seems delay falls in favor of UST proceeding with construction so time is of the essence in determining the environmental impact of this arena.

Sincerely,
Julia Stein Dittberner
1630 Beechwood Ave
St Paul

From: Lynette Sikora <lynette@designguys.com>

Sent: Sunday, November 3, 2024 3:28 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>;
#CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>

Subject: UST Revised EAW Comments

You don't often get email from lynette@designguys.com. [Learn why this is important](#)

Josh Williams, Mayor Carter and councilpersons,

Please see the attached document containing Revised EAW comments on UST's Anderson Arena.

Regards,

Lynette Erickson-Sikora

Comments on the Update for University of St. Thomas Multipurpose Arena Environmental Assessment Worksheet (EAW)

Lynette Erickson-Sikora, 173 Montrose Place, St. Paul, MN 55104 – November 3, 2024

The Minnesota Court of Appeals determined that the University of St. Thomas Anderson Arena is part of an extensive **stepped development** on UST's south campus. It cannot be viewed in isolation.

By order from the Court the Environmental Assessment Worksheet for the St. Thomas Multiuse Arena was determined to be a **stepped development**, based on the yet incomplete Schoenecker Center at the time the Anderson Arena was already underway. Since groundbreaking at the arena site other simultaneous south campus projects were announced by UST. The scope of the **stepped development** must now include a Microgrid project expansion to Owens Hall and a new Seminary parking lot. These are not reflected in the EAW though planning for them was underway before the revised 2024 EAW was drafted. The revised EAW does not include a replacement for the demolished Cretin Hall, though its removal was part of the arena project. It does not include plans for what is now the Binz Refectory or for a new Welcome Center for the Seminary. UST's master plan should be a guide for what needs to be included in the **stepped development**.

The EAW says, "the site is susceptible to extreme heat" and a dense concentration of roads, parking lots, and buildings "can significantly raise air temperature and overall extreme heat vulnerability." Yet the EAW does not address what effect this dense concentration of paved surfaces and buildings will have on the environment. We must now include the footprint and paved areas around Schoenecker Center, the newly paved areas at the Seminary and the 59-space parking lot (as reported in MyVillager October 1, 2024) being built for the Seminary in the **stepped development** and all climate calculations.

The 2024 update to the EAW says that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect," but UST is eliminating 66 mature trees, and is piping stormwater, which would naturally refresh the soil, into the river. Neither mitigates the heat island effect. There is no mention of the dozens of trees that will be lost when the Seminary lot is paved, nor does it mention the high water table on the Seminary lot site that keeps surface soil so wet year-round that it squishes underfoot and barely supports the growth of grass. The net loss of the many mature trees cannot be offset with a few young seedlings, nor can any new trees be planting in a manner that will shade the newly asphalt-paved areas. A total of 193 will be removed for the Anderson Arena, Schoenecker Center, Microgrid expansion, and

Seminary parking. 127 will be replanted, although not necessarily on south campus. Only the south campus is in the Important Bird Area and the Mississippi River Corridor Critical Area, so elimination of trees here and planting them elsewhere on a UST campus poses a serious impact on an ecologically fragile site. The effect of this loss of habitat has not been studied. The city should not accept any environmental review that does not analyze the effect of this habitat loss of 193 trees on migratory and non-migratory species.

Noted as of “special concern” are the Kentucky Coffee and Swamp White Oak trees onsite yet no mitigation for them is planned.

The high water table noted in the EAW does not address the displaced ground water flowing toward the river, or where is it displaced to, with the addition of each new structure placed on the south campus. For example, the swampy conditions on the plot of land identified for the Seminary parking lot did not exist prior to the construction of the Schoenecker Center. It does not mention where water from the DNR-mapped natural spring near the arena has been diverted to. Only surface runoff has been addressed. A complete hydrology study must be done when considering the campus-wide scope of the **stepped development**.

Though a net gain of suitable habitat for wildlife is claimed on page 17 of the EAW only 0.3 acre of permeable ground will exist on the arena site. Hardly an invitation to wildlife.

The EAW claims "There are no surface waters located within the project site." However, this must now be considered a **stepped development** which includes the entire south campus. The stream in the grotto is surface water. It will be surrounded by paving and subject to surface runoff. Increased runoff in the grotto creates a greater potential for erosion. Primary flow will be fed through a drainpipe rather than infiltrating over and through soils to support vegetation and wildlife and prevent surface erosion. Erosion in the grotto endangers the Mississippi River Boulevard bridge over the grotto.

The Minnesota Court of Appeals ordered a revised EAW to address all impacts of the arena project as a phase of a **stepped development**. But the Anderson Arena, Schoenecker Center, Microgrid expansion to Owens Hall, and Seminary parking lot were not included in analysis of GHG emissions, particularly as it relates to commuting vehicles.

The Schoenecker Center has a gallery and performance spaces. Both the Schoenecker Center and the Microgrid expansion allow for growth of faculty and student populations, and represent a significant new presence on the south campus. The Court of Appeals required new EAW to address all parts of this **stepped development**.

When viewed as a **stepped development**, the huge net loss of parking on the UST south campus becomes clear. The Anderson Arena eliminated 247 spaces. The Schoenecker Center eliminated 118 spaces. None of these spaces have been replaced. The Seminary lot

will add 59 new spaces but there is no mention of how many parking spaces will be used by Seminarians, despite the fact that these new spaces figure into UST's arena parking strategy. The EAW also states that with the Seminarians no longer need to park in the Anderson Ramp which will free up 73 spaces. The math does not work if they are adding 59. In any case, Seminary usage was not called out in 2023 EAW; UST did not disclose that the Seminary was using available visitor spaces, further limiting UST's ability to provide parking for the arena. Without an actual count of how many Seminary vehicles use the UST lots, it is speculation to say that the new Seminary lot will free up space in UST lots; the Seminary does not have other indoor and outdoor parking facilities.

On-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum. The effects of the Schoenecker Center on street parking cannot be analyzed without collecting on-street parking utilization. The Court of Appeals required that the effects of the Schoenecker Center be studied as a **stepped development**, but Schoenecker was not open at the time the 2023 on-street parking counts were conducted. No updated study has been done.

Available campus parking at UST is a significant enough issue that it needs to be counted, verified and analyzed by an independent party, not subject to the distortions put forth by UST.

Level of Service traffic analysis in the Revised EAW is incomplete. It has not been updated to include other aspects of the **stepped development**. The Revised EAW uses the same study as used in 2023 EAW. Because the EAW has not been updated, it does not reflect (a) the added traffic caused by the opening of the Schoenecker Center; (b) the added traffic from the continued development of Highland Bridge; and (c) the dramatically increased attendance due to UST moving from the CCHA to NCHC conference. (d) Nor does it in any way demonstrate winter (hockey and basketball) season road and parking conditions. The city cannot accept an EAW based on an analysis that no longer applies. An EIS is required.

Traffic Level of Service (LOS) was not considered for neighborhood residential streets and has not been updated to include the **stepped development**. At peak events, Goodrich and Cretin rated as LOS A/C, would go to F for Goodrich caused by cruising cars seeking a space. The Traffic Study does not account for cars driving up and down, seeking parking; a car that looks for parking on three streets will triple its impact.

UST claims no incompatibility with nearby land uses. As a result, the EAW specifically states that no measures are incorporated into the project to mitigate any incompatibility or any risk potential. An EIS is needed to study the scope of the **stepped development** that now encompasses most of the UST south campus. The arena will have spill-over effects

that conflict substantially with the adjacent residential uses. UST acknowledges that the traffic and parking will not be limited to the campus itself, but will affect mobility and parking in the surrounding residential community. Addressing the risk potential would include addressing an analysis on emergency vehicle access both pre and post events.

Because UST continues to plan, replace, build and expand on the south campus, all planned developments should be considered in the stepped development. The EAW does not discuss UST's and the Seminary's future plans for the south campus. And it is known that UST's plans include the replacement of Brady Education Center, Binz Refectory and Grace Hall, effectively rebuilding the entire south campus. Besides a new surface lot the Seminary plans a Welcome Center facing the Mississippi River Boulevard. These works-in-progress should all be part of this EAW as phases in a **stepped development**.

The EAW states Arena events will occur in evenings and will therefore not conflict with peak class periods. However, students live on campus. There is no basis for assumption that students will leave campus after classes and not remain for study sessions, research, library use, social gatherings, etc. The EAW also notes that the Schoenecker Center includes "an art gallery, and choral and instrumental rehearsal and performance spaces" all of which would be utilized primarily in the evening. Use and impacts of the Schoenecker Center must be included in the EAW as part of a **stepped development** per the Minnesota Court of Appeals ruling.

The EAW says no mitigation is needed for 2,499 visitors to the arena (50% capacity). Even excluding day-to-day scholastic uses of the south campus and new uses at the Schoenecker Center. UST does not have a surplus of parking to use. Those 2,499 people will have to park somewhere, and UST does not have the spaces. Again, an EAW reflecting a **stepped development** needs to look at the impacts of all development with a cold eye, not just the minimized assumptions put forth by UST.

The Court of Appeals specifically called out two major flaws in the 2023 EAW. One was that the arena should be considered as part of a **stepped development**. This was not accomplished in the Revised EAW. The other was the utter lack of a mitigation plan. Part of arena event mitigation is an Event Traffic Management Plan (ETMP). A complete Event Traffic Management Plan is required to be developed on consultation with St. Paul PED and Public Works Departments. A thorough ETMP should have been developed and incorporated into the EAW so that its environmental effects can be considered. It would be arbitrary and capricious for the city to accept an EAW without analyzing the environmental effects of an ETMP. The revised EAW fails on both counts cited by the Court of Appeals. It needs to be corrected with a comprehensive Environmental Impact Statement.

Dear Sir or Madam:

I am writing in support of requiring a *full* Environmental Impact Statement for the arena currently under construction at the University of St. Thomas.

I am deeply concerned about the environmental impact of building such a facility at this location when we are in the midst of a devastating climate crisis. As you know, this summer we experienced higher than normal temperatures and a drought. The hottest summer on record in MN was in 2021. As climate scientists tell us, rising temperatures and drought will only get worse in the future.

To quote the EAW ""the site is susceptible to 'extreme heat' and a dense concentration of roads, parking lots, and buildings 'can significantly raise air temperature and overall extreme heat vulnerability'". The 2024 update to the EAW says that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect", but UST is eliminating 66 trees net, and simply piping stormwater into the river.

Building an arena at a location encircled by pavement and almost entirely dependent on cars for transportation -- even *with* adequate parking -- is a health hazard to the neighbors, staff and students at St. Thomas, and wildlife. It is an egregious example of climate catastrophe denial in the service of status and money.

Please protect the health of those who will be directly affected by this building and help save, rather than destroy, the planet by requiring a full Environmental Impact Statement.

Thank you.

Jean Walstrom Haley
2154 Fairmount Avenue
St. Paul, MN 55105
jeanhaley@gmail.com
612-702-5910

From: [Daniel Kennedy](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Fwd: comment on revised EAW for St. Thomas multipurpose arena
Date: Thursday, November 7, 2024 3:44:59 PM
Attachments: [Housum comment on EAW 11-6-24.pdf](#)

You don't often get email from info@advocates4rd.org. [Learn why this is important](#)

This was intended to be sent to the stthomasarena_eaw@ci.stpaul.mn.us email address.

----- Forwarded message -----

From: **Virginia Housum** <ginny.housum@gmail.com>

Date: Wed, Nov 6, 2024 at 4:02 PM

Subject: comment on revised EAW for St. Thomas multipurpose arena

To: Josh Williams <josh.williams@ci.stpaul.mn.us>

Cc: <melvin.carter@ci.stpaul.mn.us>, <ward4@ci.stpaul.mn.us>, Daniel Kennedy <info@advocates4rd.org>

Attached is my comment on the revised EAW pertaining to the St. Thomas multipurpose arena. I would call it the "proposed arena" but since the city has allowed construction to continue, illegally in my view, perhaps it is better to refer to it as the incipient arena. Please consider my comments, which are submitted after a careful review of the revised EAW. I note that the revised EAW also does not satisfy the requirements of the decision made by the Minnesota Court of Appeals in July. In addition to commenting on the arena, I reject the city's implicit conclusion that it is not subject to decisions of the appellate court.

--

Virginia Anne Housum
ginny.housum@gmail.com

VIRGINIA ANNE HOUSUM
2229 FAIRMOUNT AVENUE
SAINT PAUL, MINNESOTA 55105

November 6, 2024

TO THE CITY OF SAINT PAUL PLANNING OFFICE:

RE: Environmental assessment worksheet concerning the St. Thomas multipurpose arena

Introduction

On the morning of November 4, 2024, I was driving north on Cretin Avenue from Ford Parkway. I was struck by a sign on that corner which said "not a truck route." Since I was following a large dump truck which proved to be headed to the St. Thomas campus and there were two other large dump trucks headed south, I considered the template represented by the sign: a city rule widely ignored, just as the normal rules governing the University of St. Thomas' multiuse arena on the university's south campus have been ignored by the city of Saint Paul. I submit these comments on the second and amended environmental assessment worksheet ("EAW") in frustration and incomprehension of the city's apparent determination to benefit an institution which uses an exorbitant amount of city resources and yet pays no taxes, or even a small payment in lieu of taxes. I hope my cynicism about this process is mistaken. I am confident that in future years the city and UST both will regret the approval of an EAW which enables a decision to permit the Arena to be built as proposed on the south campus. I submit these comments as a neighbor who will be immediately affected by the Arena to be built on the south campus of the University of Saint Thomas ("UST").

Flawed process

Preliminarily, this EAW was not the subject of a single public meeting at which comments would be solicited, notwithstanding promises by city staff that the review of this amended and restated EAW would be a "full process" with public meetings to present it. The city's first EAW was rejected by the Minnesota Court of Appeals, and the city embarks again on a failed process with procedural flaws which exacerbate the problems in the review process for the previous EAW. I note that when I tried to contact city planning staff suggesting various mechanisms for the city to obtain input from its neighbors to see if a compromise could be reached, not only was the suggestion rejected, but the city attorney's office told a lawyer representing a nonprofit to tell me not to contact city staff again. [See attachment 1 to this comment.] The Arena proposal could have been improved with neighborhood input.

Failure to comply with opinion of the Court of Appeals noting that the city failed completely at insuring mitigation would be “specific, targeted, and certain.”

The new EAW again fails to meet the statutory standards for mitigation addressed by the Court of Appeals, which found such efforts must be “specific, targeted, and certain.” In fact, the Court of Appeals found that the city’s failure was “arbitrary and capricious,” a stunning rejection of the management of the process by a municipality. Courts rarely found municipal actions arbitrary and capricious. But the city’s failure was understandable, since UST cannot even predict how many events it will host per year at the Arena. The city should have told UST to figure out all the intended uses of the Arena, and then the city would consider the EAW. Although the EAW noted that “[i]t is anticipated that the Arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs [EAW, page iii], the EAW does not identify how many such events are anticipated, much less certain to occur, and the EAW is totally silent on the extent UST intends to rent out the Arena for other non-university events. Given the lack of information about the intended usage of the Arena, the EAW is inherently flawed in analyzing the environmental effects of such usage. In the following section of this comment, I have made suggestions for steps the city and UST should undertake to seek to mitigate the damage which can be expected from the Arena, but note that this steps likely would themselves be inadequate if UST uses the Arena to an extent exceeding the uses specifically referenced in the EAW, as seems likely.

Recommended mitigation

In light of the Minnesota statutory requirement for mitigation which is “specific, targeted, and certain,” which must be met BEFORE the EAW can be approved and must last far longer than the two year monitoring window previously suggested by the city, it is essential that there be far more specificity about the realistic plans for mitigation of harm. Since the EAW no longer contains a section on mitigation, it is clear that UST has decided that since it cannot meet the requirements set by the Court of Appeals, it will simply try to bury the issue. In the absence of any attention to specific, targeted, and certain mitigation, here are several ideas for meaningful mitigation measures which could actually reduce the environmental damage which will be caused by the Arena.

1. Eliminate the merge lane on southbound Cretin Avenue between Grand Avenue and Goodrich Avenue. At Grand Avenue, Cretin Avenue has a right turn lane to enter the south campus of UST. South of that intersection, Cretin Avenue has a “merge lane” for vehicles which intend to continue going south on Cretin Avenue. The effect of the merge lane is to encourage cars to speed in a race course-like fashion, to insure they can continue proceeding south on

Cretin Avenue. By the time vehicles reach Goodrich Avenue, many are traveling at 40 miles per hour, and are unwilling, or perhaps unable, to stop for the crosswalk at Goodrich and Cretin. Cretin Avenue is not I-94, or even Highway 5, neither of which has pedestrian crossings. The merge lane is absolutely inconsistent with pedestrian and bicyclist safety on the cross streets south of the campus and should be permanently eliminated.

2. Build bumpouts on Cretin Avenue for all cross streets between Lincoln Avenue and Randolph Avenue. Speeding drivers make Cretin Avenue exceedingly dangerous for pedestrians, bicyclists, and other users of the streets. To mitigate the increased traffic caused by the Arena, additional steps are needed to make street crossings safe. The city has proposed bumpouts at Goodrich Avenue, but pedestrians cross at many other streets south of Goodrich. Only Jefferson Avenue has an appropriate pedestrian activated signal to slow drivers. Jefferson Avenue is too far south of the northern traffic signal at St. Clair, and the traffic signal at St. Clair (currently inactive) is too far south to compel vehicles to slow at the crosswalks between Grand Avenue and St. Clair Avenue.

3. Add a pedestrian activated signal (like the one at Jefferson Avenue and Cretin) at the intersection of Goodrich and Cretin. Many pedestrians and bicyclists cross Cretin Avenue at Goodrich, because it is one of the few streets which allows direct access to the Mississippi River and the trails along East Mississippi River Road. That intersection will experience even greater usage as guests of the university try to reach the Arena, especially in light of the growth in attendance at UST, evidenced by the public announcement by UST which appears below at the section of this comment on page 9, at comment number 16. A pedestrian activated sign is a plausible mechanism to assist pedestrians seeking to cross Cretin Avenue, even though it will not be a full proof safety measure.

4. Demand increased bus service in the area. Although UST promise to work with MetroTransit on improved transit services, the results of its efforts in the last two years is that the neighborhood in fact has **lost** bus service during the exact time when UST ostensibly was meeting with MetroTransit about improving transit service, and notwithstanding the growth in student enrollment. The 21D bus, which used to travel south from Marshall Avenue to Summit and Finn has been cancelled. The popular route 87, which formerly served Cretin Avenue going north to Roseville, now runs only on Cleveland Avenue. Bus route 74, which used to run on St. Clair Avenue, no longer runs there. The effect of UST's efforts at improving mass transit have failed miserably to date. This fact shows that no confidence can be placed in UST's efforts at "specific, targeted, and certain" mitigation. For this reason alone, the EAW fails on this test, just as the previous EAW failed.

Errors, misrepresentations and omissions of essential data from the EAW.

1. The EAW suffers greatly by its continuing limitation of analysis to the 6 acre site where the Arena will be built. The EAW could be made meaningful by a serious review of the effects of the Arena on its surroundings. But even looking at the wider south campus, rather than simply the Arena site, the EAW demonstrates serious and unacceptable environmental damage. At pages 16 through 18, UST documents the destruction of 193 trees on the site for the construction of the Arena. No effort has been made to calculate the loss of carbon sequestration from those trees, nor the temperature and heating consequences from the loss of shade. In terms of efforts to mitigate the harm to the south campus alone, and on the neighborhood, UST now shockingly admits that it does not intend to replace a single tree on the south campus! Any new trees will be planted on the north campus. In previous iterations of the Arena story, prior to commencement of construction, UST informed the community at public meetings that approximately 75 trees on the site would be replaced in the vicinity of the Arena, but they would be young, small trees for years to come. Adding insult to its illusory promise, UST said it would use acorns and seeds from the mature trees willfully destroyed. As disclosed in the EAW, UST intends to destroy a sensitive ecological area close to the river, and then add trees at a great distance from the river. In this way, UST is damaging the Mississippi River flyway, which is a federal crime, and hurting the many thousands of birds who are dependent on the bluff site for survival. The city must require UST to agree in writing to replace the trees which will be destroyed, on a ratio of at least 4:1, to compensate for the loss of the air filtration and carbon sequestration trees provide. Further, the new trees should be planted on the south campus, where the greatest damage from the new Arena is going to occur.

2. UST is in violation of its contractual obligations under its existing conditional use permit (the "CUP"), which constitutes a contract between UST and the city, which is enforceable by the city. The Arena is being built to be 75 feet high, far in excess of the height limit set out in the applicable zoning ordinances, which limit height on the site to 40 feet. As a result of violating the CUP, UST can no longer claim the benefits of the greater height provisions set out in the CUP, and must be held to building no higher than 40 feet on the site. The EAW cannot be accepted in order to permit the Arena to be built as proposed, because it exceeds the 40 foot height limit.

3. On pages 23 and 24 of the EAW, UST represents that the Arena will be compatible with nearby land uses. This is completely untrue. In fact, the neighborhood is almost entirely composed of single family homes, with a few duplexes in the mix. It is a

residential neighborhood. The construction of a massive sports arena in a single family neighborhood is unprecedented in the Twin Cities. The arena could have been constructed without disruption to family neighborhoods in another location, in particular, the site west of the Target store on Hamline and University Avenues. The EAW fails in failing to assess the better, less disruptive locations on which the Arena should be built.

4. The massive amount of additional paved surface area will increase runoff into the grotto and the Mississippi River, and it is likely the water will be contaminated by the chemicals used to make ice at the Arena. The river provides drinking water to millions of people (including the entire population of the City of Saint Paul), and supports an aquatic environment for countless fish and other animals, including endangered turtles. Residents of the city expect the city government to act as a steward of the river. By approving the EAW and this Arena, the city will have thrown its support behind forces for polluting and damaging the Mississippi River, one of the most important environments on the continent. This action cannot be tolerated by an electorate committed to preventing adverse climate impacts.

5. Activities at UST have generated countless noise complaints resulting from athletic events and practices on the campus. The EAW fails to address the consequences of the use of external speakers and other sound amplification systems. So far, UST has chosen to treat even minor athletic events like they are monster truck rallies, resulting in excessive noise which can be heard as far away as the intersection of Prior and Goodrich Avenues. This issue must be studied in order for the EAW to satisfy its statutory purpose.

Traffic implications

Even without pedestrian accidents and consideration of construction disruptions, the Arena project is going to have a very significant deleterious effect on traffic along Cretin Avenue, especially at the intersections with Goodrich, Fairmount, Princeton, and Sargent Avenues, north of St Clair. The defects in the EAW I have identified in the discussion of traffic implications of the arena include the following:

1. The EAW includes no improvement in its analysis or revised traffic counts from the failed effort made in the earlier version of the EAW. It is fatally flawed in failing to consider the future growth in traffic on Cretin Avenue from the continuing buildout of the Highland Bridge development as cumulative with the additional pressure from the Arena. The number of events at the Arena remains uncertain, and is not addressed in the EAW. Therefore, the growth in traffic on Cretin Avenue and other streets in the area is inadequate. Traffic calming is already desperately needed. With attendees at games in the winter at night, the need becomes much more urgent.

2. The EAW does not even consider the traffic impact on Marshall Avenue from the Arena, despite the fact that traffic is often backed up on Marshall Avenue.

3. On street parking utilization data was not collected for the most recent EAW. If it had been, it would have found increasing numbers of cars parked on nearby residential streets. Parking is not *per se* a problem on public streets, but increased parking which is already occurring implies that before and during events at the Arena, there will be cars on the nearby residential streets searching for parking. This will mean an unacceptable amount of greenhouse gas (“GHG”) emissions from cars left running while drivers search for parking spaces.

4. I personally have contacted UST about team buses left running for hours at a time along Goodrich Avenue at all hours of the day and night. On occasion, I have confronted bus drivers. In response, UST has told me that it is legal for team buses to be left running while the drivers are in them, although it has not cited any authority for this proposition. Nowhere in the EAW are the effects of particulates and GHG unnecessarily allowed in the neighborhood from this source explained or accounted for.

5. On page 56, the EAW states that events with parking deficits of over 100 cars are only expected to occur up to three times a year. When UST cannot say how many events will occur from the Arena being leased for non-university events, this is a misrepresentation, as UST has no basis for projecting how many events with large parking deficits can be anticipated. Prudent analysis means that the city must evaluate the EAW assuming a far greater number of events and parking deficits than UST projects, so the city can plan accordingly for dealing with problems being created.

6. The traffic signal configuration at Grand Avenue and Cretin for access to the Arena disclosed in the EAW will endanger pedestrians. Further, it will result in a requirement for all non-arena traffic to have to stop for extended periods. There is only one block north of Grand before the double traffic light on Summit and Cretin; as a result traffic on Summit Avenue will likely be blocked frequently, and east-west traffic will come to a complete standstill. Many drivers will use alternative routes on Mississippi River Boulevard or Cleveland Avenue to avoid the traffic jams. In addition to creating a traffic nightmare, this scenario also will result in more GHG in the immediate area. Of even greater importance, it appears UST has only considered solutions to access problems for attendees at events at the Arena. The city must analyze the EAW in the interest of all citizens of Saint Paul. It cannot allow itself to be a partner to UST in solving the traffic problems created for visitors from other parts of the metro area coming to UST events. The city must address problems being created for the average Saint Paul resident who is not attending an event at the Arena, but simply trying to go about his or her normal daily affairs.

7. On page 59 of the EAW, UST says it will produce a traffic management plan “designed to minimize transportation impacts and enhance safety and efficiency during events.” UST has had two years to develop its traffic management plan, and has not yet made even a proposal. The reason for this is obvious: the traffic and transportation problems which will be created by the Arena whenever it is in use are not susceptible to resolution. Perhaps they can be partially mitigated, but there is no explanation for why the city would approve an EAW which cannot and does not solve the problems to be created. The city should not tolerate another intractable problem in the neighborhood in order to accommodate an entity which is an excessive user of city services and provides literally no financial or other benefit to the city.

8. The EAW itself states that a normal traffic study should provide for a 15% margin to accommodate unanticipated issues which arise, but never explains how any of the actions UST may take will address the need for a 15% margin of flexibility.

9. On page 60, the EAW indicates that UST will schedule “no park” days on campus. But UST does not control the surrounding streets. “No park” days on campus will simply mean more cruising in the neighborhoods for parking spaces.

10. In the analysis of parking needs, the EAW never considers the needs of residents. It should take into account the likelihood of residents wanting to have birthday parties for children, celebrations of other family milestones, or a simple family holiday. From the point of view of UST, inherently but unacceptably endorsed by the EAW, the needs of everyone else who lives in the vicinity must give way to the desire of UST to have fans attend games without inconvenience.

11. Although on page 60 of the EAW, UST dangles the possibility of providing shuttles for game attendees from other local establishments, this is totally unrealistic. For one thing, the site plan for the Arena does not provide pickup and drop off sites for these shuttles, or even for Uber or Lyft drivers. For another, there is already a history of buses sitting and idling illegally on neighborhood streets. The city traffic enforcement office isn’t operative in the evenings or on weekends when games often will be played. So even if neighbors try to assist in enforcement of existing parking restrictions, there is no mechanism by which parking restrictions can be enforced. The EAW fails to address how these problems will be addressed.

12. On pages 62 and 63 of the EAW, UST acknowledges that it may be forced to close the driveway at the Binz Refectory. Somehow, UST seems to think that it should accept the benefits of the CUP it holds at the same time that it refuses to comply with its contractual

obligation to perform its agreements under the CUP. The EAW is inadequate because it should address directly the inability of UST to continue to use the driveway at the Binz Refectory.

13. In Appendix C, the EAW's analysis of GHG does not take into account vehicles owned and used by students, and uses the same minimal numbers of vehicle trips and overstates passengers per vehicle in order to back into a conclusion that the Arena does not create an unacceptable level of GHG. The city should not tolerate such shoddy work in determining whether the amount of GHG generated by use of the Arena (as opposed to its construction) is consistent with LU-54. The city should insist on insuring that the Arena does not produce excessive GHG in the city. But the EAW fails to meet even minimum standards for such an analysis, because the result of a serious study would show that the Arena will produce unacceptable deleterious effects on the health of its residents.

14. In Appendix D-1, the EAW should state the number of people who will be coming to the Schoenecker Center for practice space and performances, and the consequences of those events must be aggregated with the reported results of the analysis of the Arena on a stand alone basis.

15. UST's "smart parking system" fails to address the obvious lack of data UST will suffer in attempting implementation. UST may be able to identify empty parking spaces in its lots and garages, but it has no control over the surrounding streets, and at best, will be directing drivers to cruise neighborhoods looking for legal areas for them to park. The astute reader of the EAW would assume that part of having a "smart parking system" will take into account the needs of neighbors, and that UST will support the expansion of permit parking sought by nearby residents to control street usage from the anticipated flood of people seeking parking after the lots and garages on campus are full. Even without the Arena being constructed and in use, there are serious illegal and dangerous parking practices occurring¹; it can only be expected that such occurrences will be more frequent in light of the growth in enrollment announced by UST, when added to the increase in visitors to the Arena.

16. In Appendix D-2, the EAW contemplates a different understanding of "gradual expansion" in enrollment than is appropriate. It is impossible to square this representation with the following announcement by the university on November 4, 2024:


¹ For example, cars with out of state license plates park about 3 feet from the fire hydrant at Finn and Grand every single day, which will make it difficult for Saint Paul firefighters to access the hydrant when needed. This is a serious traffic violation which should be penalized.

St. Thomas Celebrates Second-Largest Undergraduate Class in 20 Years

Posted about 22 hours ago in University of St. Thomas News .



The University of St. Thomas welcomed 1,591 first-time, first-year students to campus this fall, the second-largest undergraduate class in two decades at Minnesota's largest private university. The total represents a 4% year-over-year increase, helping to propel St. Thomas' total student population to a four-year high of 9,445.

 Graphic detailing University of St. Thomas Fall 2024 Enrollment Highlights, including total enrollment of 9445, graduate student enrollment of 3,140, undergraduate enrollment at 6,063 and enrollment at Dougherty Family College at 242.

Graduate student enrollment also rose, with a 2% boost year over year to 3,140 total students. Graduate student credits are up 4% compared to last fall and include significant increases for the College of Arts and Sciences, School of Education and School of Engineering.

"The increase in new students joining our undergraduate and graduate programs compared to last fall exemplifies the dynamic appeal of our diverse academic portfolio and the trust placed in our institution," Vice President of Strategic Enrollment Management Omar Correa said. "This balanced expansion is a testament to our faculty's excellence and our institution's capacity to meet the evolving needs of students at all stages of their academic journey."

The 2024-25 enrollment data shows St. Thomas' overall student population is more diverse than any time in its history. A record-setting 31% of students at the university now identify as BIPOC (Black, Indigenous, and people of color).

"We are excited by the growth and diversity of our student body, which enriches the learning experience for all and prepares our graduates to thrive in a diverse world," Correa said.

Conclusions

The city and UST have both squandered an opportunity to improve the Arena and its environs by engaging UST's neighbors in developing creative solutions to the consequences of the decision to proceed with an oversize Arena on the south campus. UST should not be permitted to encumber the neighborhood unnecessarily, as it proposes. Throughout the EAW, UST minimizes the numerous detrimental impacts the Arena will have on the area, only some of which have been addressed in this comment. UST should convene a group of neighbors who will work with it to help it find meaningful mitigation opportunities.

At some point in the recent past, the city abandoned its old slogan of being "the most livable city in America." If this EAW is approved, it will be clear that the old slogan no longer applies. By that decision, the city would make clear its indifference to the well being of its residents and protection of the environment.

Respectfully submitted,

Virginia Anne Housum

Virginia Anne Housum

Ginny.Housum@umb.com

Telephone: 612-384-6452

ATTACHMENT 1

----- Forwarded message -----

From: **James C. Kovacs** <JKovacs@bassford.com>

Date: Fri, Jul 12, 2024 at 8:21 PM

Subject: Fwd: [EXTERNAL] Voicemail message from "MINNESOTA CALL (+16512668710)" [00:03:18]

To: Virginia Housum <ginny.housum@gmail.com>, Donn Waage <Waage58@outlook.com>, Alan I. Silver <ASILVER@bassford.com>

Ginny and Donn:

See the voicemail I received from Dan Stahley.

Thanks.

Get [Outlook for iOS](#)

From: Cloud PBX Voicemail <voicemail@serverdata.net>

Sent: Friday, July 12, 2024 4:34:47 PM

To: James C. Kovacs <JKovacs@bassford.com>

Subject: [EXTERNAL] Voicemail message from "MINNESOTA CALL (+16512668710)" [00:03:18]

Voicemail Message Received

Dear **James Kovacs**,

A new voicemail message from MINNESOTA CALL (+16512668710) was received in your voicemail box.

Date/Time Received: 07/12/2024, 03:33:24 PM (CST)

Duration: 00:03:18

Voice mail transcript:

To hey, Jim, dan staley, calling you from the St. Paul city attorney's office. Just kind of responding to the letter that you sent to us yesterday evening and you wanted a response by the end of the day today. Kind of, in addition to what I spoke to you about yesterday about it not being a final judgment on the merits, because it's, it's my understanding that st. Thomas doesn't tend to appeal the decision. So it's still kind of a pending opinion of at this point, additional that I did speak to the building official today and who would be the person who's responsible for issuing a stop for a quarter. And he did not believe that he had authority to issue a stop work order at this time. So basically the minnesota rules are \$1300.00. 110 is the building official has the authority to, to interpret building code and rules. And he has the authority to issue a stop for a quarter under 1300 dot 0170. But he's only able to do so under circumstances the 1st of on safe work being done, or if it's dangerous and kind of a, his practice. Some policy is that he or she will stop work order. If there is a, if there's a danger to life or property and a for and was directed to do so by a court, his interpretation of the court of appeals opinion last month. But it was not an order telling us that we have to stop working on. So in order telling us to have additional process to do additional study and analysis, that must be done. And so he believes that he doesn't have authority to issue stop poor quarter. So even if you wanted to, he couldn't, and the extent that he did issue a stop work order and there would have to be a lot of work done after that of for instance, he would probably said you'd probably have to instruct the contractors to finish the foundation because he can issue, you can issue a stop or quarter of doing so it'd be dangerous. So he believed that it would be dangerous to kinda leave the site as it is today. They would probably have to finish back feeling great in the foundation and just to leave it in a safe and in a safe manner, which is kind of, you know, additional construction going forward. So I'll be around for a little bit longer today. If you want to chat, i just, I was kind of wondering what your thoughts were on that respond to kind of knowing that there's kind of additional reasoning here and kind of a just being building official believing and not having a 40 to issue a stop recruiter at this of this moment because it'd be dangerous to do so to the condition of the site as it says today. So give me a call here. If you wanna talk about it, I'll probably be here for about another half hour or so. But.

The attached voicemail message can be listened to on your computer, or forwarded to another email address.

To delete the message from your voicemail box, please access it from your phone, or mobile application, and delete it from there.



Make calls via a single click, receive calls anywhere, listen to your voicemail messages and access many other features of your Elevate Unified Communications service. Download the free [Windows](#), [MAC](#), [iOS](#) or [Android](#) Elevate app for your environment and boost your productivity! Please contact your system administrator for more details.

Thank you for being a valued customer!

--
Virginia Anne Housum
ginny.housum@gmail.com

From: jjohns007@icloud.com
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: comments on revised St. Thomas Arena EAW
Date: Thursday, October 24, 2024 6:25:56 AM
Attachments: [Revised EAW comments.docx](#)

You don't often get email from jjohns007@icloud.com. [Learn why this is important](#)

Mr. Williams,

I live near St. Thomas University in St. Paul, so have been following the arena plans with interest.

Below and attached are my thoughts regarding the Transportation section of the revised EAW.

Respectfully,

-JJ

James Johnson
jjohns007@icloud.com
2224 Dayton Ave, 55104

Comments on Revised EAW, Transportation Section
Jim J 10.23.2024

The projected congestion at the Cretin-Selby and Cretin-Goodrich intersections (a rating of F for the cross streets, even with mitigation: Table 14) is highly concerning. No mitigation plan is described for the Cretin-Selby intersection, which already is a big problem for pedestrians, including users of the route 63 bus line, which the EAW mentions as an access pathway to the proposed arena. Notably, most drivers on Cretin currently don't stop for pedestrians at that intersection, which has no painted crosswalks, despite the presence of bus stops on either side of Cretin.

Increased vehicle congestion up and down Cretin is anticipated, which is very bad, given that Cretin is already dangerously congested and fast. No increases should be tolerated. Vehicle throughput may even decrease in the not-too-distant future if the proposed 4-3 lane conversion occurs, as a traffic-calming measure to increase driver, pedestrian, and cyclist safety on this dangerous, way-too-fast "stroad" (street-road). This was not considered in the EAW, but should be.

The anticipated need during some peak events for on-street parking in adjacent residential neighborhoods remains problematic, given the uncertain availability of such parking spots, especially in winter (snow blockage along curbs and in alleys) and if permit parking is enforced, which it should be to give local residents preferential access. Arena users searching for parking

in nearby neighborhoods would create added congestion (with its associated hazards) on those side streets. The drivers likely would not be adequately alert for cyclists and pedestrians (including children), given their likely fixation on rapidly finding a parking spot, and would likely exceed the 20 mph speed limit, given that they've just turned off a high-speed "stroad", where speeds often exceed 40 mph. The added engine and roadway noise, exhaust pollution, and headlight pollution from added vehicles circling around on residential streets must be considered in the EAW. It predictably will degrade the quality of life for residents, and pose some health risks.

Listing the route 87 bus as a third public transit option is a bit of a stretch, given how infrequently that bus runs on evenings and weekends. Few arena attendees are likely to find it useful for evening and weekend games.

It is not clear that the projected number of events takes into account the likely future use of the arena by non-St. Thomas entities, e.g., area schools. This should be clarified, and the impact of such events on congestion and parking availability should be addressed.

November 5, 2024

Attn:

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102
[StThomasArena EAW@ci.stpaul.mn.us](mailto:EAW@ci.stpaul.mn.us)

Re: St. Thomas Arena EAW comments

As a resident of the Macalester Groveland neighborhood, within 3 blocks of the proposed arena, I am submitting this response to the updated EAW for the St. Thomas Arena. I have reviewed the many detailed and excellent review comments in response to the original EAW and I wholeheartedly concur with the following statement:

The 2023 Environmental Assessment Worksheet is incomplete and insufficient in addressing the environmental impacts of UST's South Campus construction and an Environmental Impact Statement is necessary to determine a more accurate and realistic calculation of the cumulative impact.

Of the numerous concerns that have been documented in earlier comments, I would emphasize:

Accurate attendance & parking demands:

The projected seated attendance of 5,500 for Basketball and 4,000 for Hockey do not include standing room, participants, referees, food service, custodial, security, box office/ticket takers, medical, trainers or other users of the building, including a second hockey rink.

Additionally, the parking demands need to analyze the overlap of other campus events – especially the overlap of the football, hockey & basketball seasons. Per the UST athletics website:

- 2024 football game schedule: **August 29 – November 23**
- 2024/25 Hockey game schedule: **October 5 – March 1**
- 2024/25 Basketball game schedule: **November 4 – March 5**

These schedules do not account for the additional overlap if UST has post-season tournament play with the potential for a football and hockey or basketball game at the same time.

Impact to recreational & historic infrastructure:

The EAW does not mention the Mississippi River Boulevard or Summit Avenue and the effects that UST development will have on them. Mississippi River Blvd. and Summit Ave. traffic will greatly increase, diminishing their use for recreation and historic presence. The maximum gross vehicle weight of trucks and buses will exceed the 9,000 lb. maximum established by the City Council for parkways in St. Paul. The site plan shows that trucks and buses entering from Cretin Avenue will exit on Summit Avenue; there is no turnaround location for all of the shuttle buses and visiting team buses that will discharge on the west side of the arena, so they will drive straight out to Summit Ave.

Violation and lack of respect to the terminus of Summit Avenue by using it for idling buses and exiting of service vehicles needs further review from the St. Paul HPC. In its previous review, the SPHPC was split on approval and needed the chair to act as tie-breaker. Additionally, the Summit Avenue Residential Preservation Association (SARPA) is opposed to the use of the existing driveway off of Summit Avenue for vehicle access to the arena. SARPA noted that the driveway is within the Summit Avenue West Historic District. Construction vehicles, large buses and delivery trucks that would use Summit to get to the arena could weigh as much as 20,000 pounds. SARPA would like arena traffic rerouted to Cretin Avenue.

- 1) Summit Avenue is known for being the longest avenue of Victorian homes in the country, having a number of historic houses, churches, synagogues, and schools. The street is four and a half miles long and while other cities have similar streets, Summit Avenue is notable for having preserved its historic character and mix of buildings. It has been described as "the best preserved example of the Victorian monumental residential boulevard."^[2]
- 2) Summit Avenue is part of two National Historic Districts and two City of Saint Paul Heritage Preservation Districts and was named one of 10 "great streets" nationally by the American Planning Association in 2008.^[2]

Compatibility with adjacent land uses:

The EAW specifically states that no measures were incorporated into the project to mitigate any incompatibility of adjacent land uses or any risk potential. We need an EIS to determine if the arena will have spill-over effects that conflict substantially with the adjacent residential uses. UST acknowledges that the traffic and parking will not be limited to the campus itself, but will affect mobility and parking in the surrounding residential community. Analysis addressing the risk potential of emergency vehicle access is also needed. The UST south campus and supporting street infrastructure are not adequate to support all the automobile and service vehicle needs of the arena and will put an unfortunate demand onto the neighboring residential streets.

In the past 100 years, UST has undergone considerable development and expansion, which has increased dramatically in the last 50 years. It is anticipated there will be further development beyond the multi-use complex currently under review. Regardless of whether or not plans have been board approved, UST representatives have stated that the east and west blocks will soon be developed and that all athletic facilities will be upgraded to meet best practice standards for Division I athletics. The EAW is not sufficient in assessing the broad impact that UST has imposed on the surrounding community. The cumulative potential effects of UST development should be assessed in total, rather than in a project-by-project, piecemeal fashion. An Environmental Impact Statement (EIS) would be a more appropriate means of assessment.

In closing:

The City should reject the current EAW and require an Environmental Impact Statement which properly defines the project; identifies all of the negative potential environmental effects; and complies with Minnesota law. The June 2023 EAW fails to properly define the project; fails to appropriately consider connected actions and phased actions; improperly minimizes the cumulative potential effects of all elements for the University's South Campus Quadrangle and related construction. The parking and congestion analyses omit necessary information, and strongly suggest that the University's acknowledged parking shortage should be solved by forcing the neighborhood to bear the negative consequences of insufficient parking on campus.

Respectfully submitted by:

Linda Kane
2132 Fairmount Ave.

CC:

Mayor Melvin Carter
melvin.carter@ci.stpaul.mn.us

Council Members

Mitra Jalali (ward4@ci.stpaul.mn.us)
Saura Jost (ward3@ci.stpaul.mn.us)

From: [Riley Kane](#)
To: [*CI-StPaul StThomasArena EAW](#)
Subject: UST Environmental Assessment Worksheet feedback
Date: Thursday, November 7, 2024 12:54:07 PM

You don't often get email from rileyrkane@gmail.com. [Learn why this is important](#)

Hello,

There are so many issues with the stadium here that are problematic (impact on the river, parking scarcity, trash, safety of pedestrians) but I will focus on one that is particularly concerning to us, and that is its impact on trees in the area.

It seems like taking down so many healthy mature trees (especially in light of the ash borer infestation that has decimated our neighborhoods) is always countered by UST with, "well we'll be planting new trees."

To equate saplings that could take well over a decade to reach decent growth is little consolation.

I believe that UST needs to do a much better job of mitigating tree loss.

Thank you,
Riley and Sarah Kane

2149 Fairmount Ave.

From: [Pete Keith](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Arena concerns
Date: Monday, October 28, 2024 2:05:58 PM

You don't often get email from pete_keith@hotmail.com. [Learn why this is important](#)

As a close neighbor, I am extremely concerned about the peripheral impact that this size of an arena will have on the neighborhood, particularly with parking. St. Thomas has made zero provisions to facilitate parking. In fact, they have reduced spaces, and in response the St. Paul Seminary is now further reducing green space, cutting down large trees in order to provide for their own parking! The solution is as plain as day--St. Thomas needs to add to their parking ramp. I've heard all the nonsense about how this "opens up the CUP" and is a can of worms. That is not my problem to solve, it is theirs. And it is absolutely solvable in short term. Then need to be good neighbors and try to live within their footprint. Add to the parking ramp, whatever the process needs to be. Thank you,

Pete Keith

50 N Mississippi River Blvd

St. Paul, MN 55014

From: [John Kingrey](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Cc: [Melvin Carter](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward3](#)
Subject: UST Arena EAW
Date: Thursday, November 7, 2024 2:56:32 PM
Attachments: [EAW.docx](#)

Some people who received this message don't often get email from jkingrey6849@gmail.com. [Learn why this is important](#)

Attached please find our comments regarding the revised UST Arena EAW.

Thank you,

John Kingrey and Karen James

2258 Fairmount Avenue, Saint Paul

TO: Josh Williams, Principal Planner

FR: John Kingrey and Karen James

2258 Fairmount Avenue, Saint Paul

RE: UST Arena EAW

Please accept our comments regarding the revised EAW for the proposed UST Arena. In our opinion, the revised EAW differs only slightly from the original plan and does not address the significant issues raised by the Minnesota Court of Appeals and confirmed by the Minnesota Supreme Court.

- The use "next-generation" refrigerants Anhydrous ammonia and Ethylene glycol are not "next-generation." The revised EAW does not address the dangers of using these toxins and the risk to the environment. Need EIS.
- The revised EAW references Important Bird Area but offers no protective measures regarding the height of building and expansive glass which will harm birds. The Mississippi flyway is one of the largest in the country.
- Idling cars do not appear to be counted because UST will use "smart parking system." UST does not have parking supply to provide "smart parking system." Moreover, idling cars are the primary producers of GHGs in the area around the arena due to the cycling of vehicles through the residential neighborhoods. The revised EAW does not include the impact of team and media buses at events.
- Updated on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Addendum. Effects of Schoenecker on on-street parking cannot be analyzed without collecting on-street parking utilization. The Court of Appeals required that the effects of Schoenecker be studied, but Schoenecker was not open at the time the 2023 on-street parking counts were conducted.
- On weekends, parking for 1,300 additional attendees will be available in the neighborhood. The revised EAW does not analyze the effects of parking in the neighborhood other than to say it will happen. It is our belief that the purpose of an EAW is to analyze the environmental effects, not just to say they will occur.
- Level of Service traffic analysis appears to be the same as in 2023 EAW. Because the EAW has not been updated, it does not reflect (a) the added traffic caused by the opening of Schoenecker Hall; (b) the added traffic from the continued development of Highland Bridge; (c) the new Microgrid building; and (d) other developments that

may have impacted traffic. The city should not accept an EAW based on an analysis that no longer applies.

- 5500 BB/4000 Hockey seated attendance does not include: standing room, participants, referees, food service, custodial, security, box office/ticket takers, medical, trainers, other users of the building, including hockey rink. The EAW does not disclose seating capacity of the second hockey rink. Any analysis of GHG should include an assumption on the impact of these additional attendees.
- Analysis is for parking for basketball and hockey only. The analysis does not include concerts, conventions. EAW is needed to include full extent of UST's usage throughout the year.
- A new traffic signal at Cretin and Grand is identified as a mitigation measure. The signal has green turn-only lights for cars turning (1) northbound left from Cretin into arena; (2) eastbound left from arena to Cretin. Those signals will require conflicting traffic to stop, causing backups. Pedestrians will be routed to cross Cretin in conflict with left turn light from arena to northbound Cretin, meaning that all non-arena traffic will halt for extended periods. With only one block to back up to Summit Avenue, traffic on Summit will be unable to pass due to backup.
- Apparently, there have been preliminary discussions with Metro Transit about free transit, as well as preliminary discussions with rideshare services about discounts. Currently, only one bus line comes to the arena area (which will be impacted by the traffic and pedestrian congestion). The site plan has no space for arena drop-off and pick-up. There should be more detail rather than simply a preliminary discussion.
- The sidewalk south of the UST greenhouse is less than 8 feet wide. Although UST is replacing this structure with a new Microgrid addition to Owens Hall, it is not widening this sidewalk to accommodate arena foot traffic. With thousands of pedestrians newly routed to this sidewalk together with the thousands that the 2023 already showed using this sidewalk, the backlog of pedestrians will back up onto Cretin Avenue, creating dangerous situations for pedestrians but also invalidating the assumptions made in describing traffic delays and LOS decreases caused by arena traffic.
- Currently, UST has approximately 6,200-6,300 students on the St. Paul campus but "aims for gradual expansion going forward." EAW does not disclose the extent of its plan to increase undergraduate enrollment. For discussion purposes, assuming an increase in enrollment by 1,000, the environmental effects of traffic and parking analyses should be included. With UST not disclosing any increase in dorm spaces, it reasonable to assume that 1,000 more people (plus the faculty and staff to support that increase) will be commuting to campus daily or, in the alternative, residing in "private dormitories" that are being built in increasing frequency.

Thank you for the opportunity to share our views.

From: [Jokich, Alexandra](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: KSTP Request -- urgent (today!)
Date: Thursday, October 17, 2024 11:45:53 AM
Attachments: [Response - Petition for Review.pdf](#)
[Order - PFR - Deny.pdf](#)

Good morning,

This is Alex Jokich, reporter at KSTP. We are covering the Minnesota Supreme Court decision this week on construction of the St. Thomas arena. I'm attaching the court documents from this week for your reference.

The folks at St. Thomas shared all of the background on this project and the legal battle with neighbors – along with how the city's been involved, with the site plan approvals, environmental assessment worksheet, etc.

I was hoping for a quick statement (and/or interview) from the city on this situation today. The courts seem to be saying the city's EAW was not sufficient. Do you have a response to that? And what is being done to address it? Where does this major project currently stand? Is it at risk of not being completed, despite construction already being underway?

We are working on deadline (as always!) and hoping to interview before 1:30pm today – although the sooner the better for us The interview will only take about 10 minutes. We can meet you wherever is most convenient or do it via Zoom if that's easier. Otherwise, a written response will suffice.

Let me know what may work on your end!

Thanks in advance for your help,



STATE OF MINNESOTA
SUPREME COURT

FILED

August 27, 2024

OFFICE OF
APPELLATE COURTS

Case No. A23-1656

In Re: City of Saint Paul's Decision on the
Need for an Environmental Impact
Statement for the Proposed University of
St. Thomas Multi-Purpose Arena

Date of Filing of
Court of Appeals Decision:

July 8, 2024

**RELATOR ADVOCATES FOR RESPONSIBLE DEVELOPMENT'S RESPONSE
TO UST'S PETITION FOR FURTHER REVIEW**

Alan I. Silver (#101023)
James C. Kovacs (#397536)
Michael J. Pfau (#402787)
Bassford Remele, P.A.
100 South 5th Street, Suite 1500
Minneapolis, MN 55402
612-333-3000

Thomas H. Boyd (#200517)
Elizabeth H. Schmiesing (#229258)
Kyle R. Kroll (#398433)
Christopher J. Cerny (#403524)
Winthrop & Weinstine, P.A.
225 South Sixth Street, Suite 3500
Minneapolis, MN 55402
612-604-6400

*Attorneys for Relator Association for
Responsible Development*

*Attorneys for Petitioner
University of St. Thomas*

Daniel J. Stahley (#387208)
Assistant Saint Paul City Attorney
15 West Kellogg Boulevard, Suite 400
St. Paul, MN 55102
651-266-8722

*Attorneys for Respondent
City of St. Paul*

INTRODUCTION

Petitioner University of St. Thomas (“UST”) seeks further review of a unanimous, nonprecedential Court of Appeals decision that correctly applies and enforces the Minnesota Environmental Policy Act (“MEPA”). There are no novel legal principles involved, matters of statewide impact, or questions that are likely to reoccur. To the contrary, by enforcing the plain language of MEPA, the Court of Appeals applied the law as it is, administering justice in the normal course and fulfilling its function as an error correcting court. Indeed, the City of St. Paul (the “City”) – the Responsible Governmental Unit (“RGU”) charged with deciding the need for an Environmental Impact Statement (“EIS”) – has chosen not to seek further review, but instead has accepted the Court of Appeals decision and is already in the process of preparing a supplemental Environmental Awareness Worksheet (“EAW”).¹

Because none of the criteria set forth in Minn. R. Civ. App. P. 117 are present here, the petition should be denied.

¹ By not seeking further review, the City has effectively accepted the reversal of its negative declaration. In fact, the City is treating the case as if it has already been remanded. And the City will likely complete its supplemental EAW before this Court could make any decision on the merits. Therefore, it is likely that UST’s Petition is entirely moot – merely a tactic to delay the entry of judgment so that UST can continue construction before judgment is entered.

ISSUES PRESENTED FOR REVIEW

1. Did the Court of Appeals correctly apply the plain text of Minn. R. 4410.1000, which unambiguously requires that phased actions must be considered “in total” when determining the need for an EIS, where the City failed to consider the environmental effects of the Schoenecker Center?

Short Answer: Yes.

The proposed Arena and Schoenecker Center are “phased actions.” Minn. R. 4410.0200, subp. 60. The law requires that “phased actions” “**must** be considered in total when determining . . . the need for an EIS.” Minn. R. 4410.1000, subp. 4 (emphasis added); *see also* Minn. R. 4410.1700, subp. 9 (“**phased actions shall be considered a single project** for purposes of the determination of need for an EIS.”) (emphasis added).

Despite acknowledging that the Schoenecker Center is a “phased action,” the EAW fails to address the environmental effects of the proposed arena and Schoenecker Center “in total.” Therefore, the Court of Appeals correctly reversed and remanded “for a new EAW that considers the project and Schoenecker Center to be a phased action.” (Op. at 11.)

2. Did the Court of Appeals correctly determine that the City “failed to address an important aspect of the problem,” by “overlooking how spectator travel would impact the project’s GHG emissions.”

Short Answer: Yes.

The Court of Appeals held that the EAW’s analysis of GHG emissions was insufficient. Both the City and UST readily acknowledge that the GHG analysis contained in the EAW **does not** include spectator transportation. Despite both the City and UST having goals of becoming carbon neutral, UST argues that it should not have to consider

such GHG emissions. But by failing to consider the cumulative effects of spectator travel – both to the proposed arena and the Schoenecker Center – the Court of Appeals correctly determined that the City “entirely fail[ed] to address an important aspect of the problem.” (Op. at 16).

3. Did the Court of Appeals correctly apply this Court’s standard for mitigation, which requires mitigation be “specific, targeted, and [] certain to be able to mitigate the environmental effects.”

Short Answer: Yes.

In *Citizens Advocating Responsible Dev. v. Kandiyohi Cnty. Bd. of Com’rs* (“CARD”), this Court held that, “[w]hen an RGU considers mitigation measures as offsetting the potential for significant environmental effects under Minn. R. 4410.1700, it may reasonably do so only if those measures are specific, targeted, and are certain to be able to mitigate the environmental effects.” 713 N.W.2d 817, 835 (Minn. 2006). Applying this exact standard, the Court of Appeals correctly found that the mitigation measures identified in the EAW were insufficient because they “are not specific, targeted, and certain.” (Op. at 21.)

Additionally, the City and UST argued that the environmental effects will be mitigated through the City’s regulatory oversight in that the City will not issue a certificate of occupancy unless UST agrees to its mitigation measures. The Court of Appeals correctly noted that tying mitigation to the issuance of a certificate of occupancy is insufficient because once the certificate is issued, the City has no authority to require performance of mitigation measure on an ongoing basis.

STATEMENT OF THE CRITERIA REPLIED UPON

None of the criteria set forth in Minn. R. Civ. App. P. 117, subd. 2, are present here. This case does not present any new, important, or novel concepts. Certainly, the requirement that the environmental effects of phased actions must be considered “in total” under Minn. R. 4410.1000 and 4410.1700 is clear and unambiguous.

The Court of Appeals issued a unanimous decision, which is nonprecedential and will only affect Petitioner. Further review of this case will not aid to develop, clarify, or harmonize the law; nor does it present a question with the potential to have statewide impact, or which is likely to reoccur. This case relates solely to UST’s proposed arena. That is it.

STATEMENT OF THE CASE

On September 26, 2023, the City issued Findings of Fact, determining that the EAW was adequate, that the proposed Arena does not have the potential for significant environmental effects, and that an EIS was not needed. ARD timely filed a certiorari appeal pursuant to Minn. Stat. § 116D.04, subd. 10.

On July 8, 2024, the Court of Appeals issued its opinion, reversing the City’s negative declaration, and remanding the case to the City for a revised EAW. (Op. at 2.) The Court of Appeals reversed because the EAW did not analyze the proposed arena and the adjacent Schoenecker Center as phased actions, as required under Minn. R. 4410.1000, subp. 4 and Minn. R. 4410.1700, subp. 9. (Op. at 11.) Additionally, although not a basis for reversal, the Court of Appeals noted that the EAW “failed to address an important aspect of the problem” by “overlooking how spectator travel would impact the project’s

GHG emissions,” and that the mitigation measures identified in the EAW were insufficient because they “are not specific, targeted, and certain.” (Op. at 16–21.)

Notwithstanding the Court of Appeals’ reversal of the negative declaration, UST continues to move full steam ahead with construction of the arena – and has made **substantial** progress since the Court of Appeals’ opinion was issued. On July 22, 2024, ARD filed a motion requesting the Court of Appeals enforce its ruling and enjoin further construction. In its response to ARD’s motion, UST argued that although a negative declaration on the need for an EIS was required to begin construction, the subsequent invalidation of the negative declaration does not require the stopping of construction. Thus, it is apparently UST’s position that the Court of Appeals’ reversal is of no consequence; and too, that whatever this Court does will have no impact on its project.²

ARGUMENT

I. The Court of Appeals correctly applied the plain text of Minn. R. 4410.1000, which unambiguously requires that phased actions must be considered in total when determining the need for an EIS.

The regulations at issue are unambiguous and straightforward. UST’s Petition does not present any esoteric questions of statutory construction, or novel questions of law. The law requires that “phased actions” “**must** be considered in total when determining . . . the need for an EIS.” Minn. R. 4410.1000, subp. 4 (emphasis added); *see also* Minn. R. 4410.1700, subp. 9 (“**phased actions shall be considered a single project** for purposes of the determination of need for an EIS.”) (emphasis added).

² Since UST has taken this position, one must ask: why is UST even seeking further review?

There is no real dispute that the proposed arena and Schoenecker Center are phased actions. And any objective review of the EAW demonstrates that it does not consider the Schoenecker Center as a phased action, and therefore, did not consider the Center's environmental effects "in total" with the arena – and the EAW certainly does not treat the Schoenecker Center and proposed arena as a single project, as required by Minn. R. 4410.1700, subp. 9.

Indeed, the EAW itself, in its analysis of the proposed arena alone, "certifies" that "there are no other projects, stages, or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively." (*See Op.* at 7 n. 1.) The Court of Appeals was correct to take the EAW at its word.

More generally, there is no dispute that the EAW does not analyze GHG emissions of the Schoenecker Center, or its effect on parking demand. The Court of Appeals correctly applied the unambiguous language of Minn. R. 4410.1000 and Minn. R. 4410.1700.

II. The Court of Appeals correctly determined that the City "failed to address an important aspect of the problem," by "overlooking how spectator travel would impact the project's GHG emissions."

The Court of Appeals reversed the City's negative declaration because it failed to consider the Schoenecker Center a phased action. Additionally, however, the Court of Appeals noted that the EAW failed to address increased GHG emissions from spectator travel to and from the proposed arena. But since this issue was not a basis for the Court of Appeals' reversal, it is not a basis for further review in and of itself.

Nevertheless, UST argues that the City properly analyzed GHG emissions “resulting from the Project.” But we know this is not true because the EAW does not analyze GHG emissions from the Schoenecker Center, and under Minn. R. 4410.1700, subp. 9, the proposed arena and Schoenecker Center must be considered a “single project.” So, the EAW did not properly analyze all GHG emissions resulting from “the Project,” when the scope of the project is properly defined.

Moreover, both the City and UST proclaim to have goals of becoming carbon neutral. By failing to consider the cumulative effects of spectator travel – both to the proposed arena and the Schoenecker Center – the Court of Appeals correctly determined that the City “entirely fail[ed] to address an important aspect of the problem.” (Op. at 16.)

III. The Court of Appeals correctly applied this Court’s standard for mitigation, which requires mitigation measures be “specific, targeted, and [] certain to be able to mitigate the environmental effects.”

UST argues that the Court of Appeals “exceeded its authority” when it applied the standard for mitigation as set forth by this Court in *CARD*. In *CARD*, this Court held that, “[w]hen an RGU considers mitigation measures as offsetting the potential for significant environmental effects under Minn. R. 4410.1700, it may reasonably do so **only if those measures are specific, targeted, and are certain to be able to mitigate the environmental effects.**” 713 N.W.2d at 835 (emphasis added).

There is nothing controversial about this standard – it has been the law in Minnesota for nearly 20 years. The Court of Appeals applied this standard, quoting directly from this Court’s opinion in *CARD*, and found the proposed mitigation measures insufficient because they “are not specific, targeted, and certain.” (Op. at 21.)

Further, the City and UST’s reliance on “regulatory oversight” to remedy their deficient mitigation measures is improper. As the Court of Appeals noted, tying the issuance of a certificate of occupancy to the future implementation of mitigation measures does not work because “it is unclear how the city could or would enforce the mitigation measures it recommends because the measures described occur **after** the city issues a certificate of occupancy to the university.” (Op. at 21) (emphasis in original).

CONCLUSION

For the reasons stated herein, the Petition for Further Review should be denied.

BASSFORD REMELE
A Professional Association

Date: August 27, 2024

By s/ James C. Kovacs
Alan I. Silver (#101023)
James C. Kovacs (#0397536)
100 South 5th Street, Suite 1500
Minneapolis, MN 55402-1254
Telephone: (612) 333-3000
asilver@bassford.com
jkovacs@bassford.com

Attorneys for Relator
Advocates for Responsible Development

FILED

October 15, 2024

**OFFICE OF
APPELLATE COURTS**

STATE OF MINNESOTA

IN SUPREME COURT

A23-1656

In re City of St. Paul's Decision on the
Need for an Environmental Impact
Statement for the Proposed University
of St. Thomas Multipurpose Arena.

O R D E R

Based upon all the files, records, and proceedings herein,

IT IS HEREBY ORDERED that the petition of the University of St. Thomas for
further review is denied.

Dated: October 15, 2024

BY THE COURT:



Natalie E. Hudson
Chief Justice

THISSEN, PROCACCINI, JJ., took no part in the consideration or decision of
this case.

From: [Cynthia Levine](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: STU needs to do better and do more
Date: Thursday, November 7, 2024 4:01:10 PM

[You don't often get email from cynthiaraelevine@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Josh.

As a resident of the Kings Maplewood neighborhood of St. Paul I was shocked when I first learned of St. Thomas's plan to build a hockey arena on its campus. I became horrified when I learned that the proposed arena would be directly on the edge of the Mississippi Watershed. Even before learning any of the factual information about why such a structure should absolutely NOT be sited in STU's planned and proposed site, from a simple visual and global perspective, it appeared to me to be a horrendous idea.

Now that it has become very clear that STU cares not for the planet or its neighbors, I am truly hoping that the city of St. Paul will do the right thing by holding STU accountable to following the same standards as all others in our fair city.

STU is violating the zoning for the River Corridor Urban Open Overlay! The CUP regarding height of building the on campus is 75', yet the arena, in its proposed site, is within the RCUOO (items 23-24 in proposed EAW).

Would any other entity receive approval from the city to build a facility that would store toxic refrigerants without having approval first from the MCPA (items 19)

I'm closing here to meet the 4pm deadline and hope that my next email will also be included
Sent from my iPhone

From: [Cynthia Levine](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Follow on from previous email. STU's inadequate EAW
Date: Thursday, November 7, 2024 4:16:40 PM

[You don't often get email from cynthiaralevine@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Despite being minutes past the deadline, I am hopefully these comments will be considered when reviewing the grossly inadequate EAW for the proposed STU arena.

In addition to not seeking approval from MPCA before building the arena, STU also neglected to seek approval from the EPA for approval of housing toxic substance in the watershed of the Mississippi River. I would like to know how the planning committee of St.Paul is ok with such blatant disregard for our city and the waters that flow through it.

Lastly, the net loss of 66 mature trees in the Mississippi River Corridor Critical Area will be significant. STU proposes no mitigation plan for the detrimental effects that would certainly occur if plans continue (items 17-18).

It is my most sincere hope that the city request STU address the multiple grave issues with the current EAW, as well as demand and EIS that takes into account the impact of the proposed arena will certainly have on the neighborhood and the environment as a whole.

With gratitude for you efforts,
Cynthia Levine
2236 Sargent ave 55105

Sent from my iPhone

From: [DIANE MALFELD](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Comments on Mitigation "Plans"
Date: Thursday, November 7, 2024 2:26:27 PM

[You don't often get email from dnmalf@aol.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I live near St Thomas University at 84 N Mississippi River Boulevard with my husband, Craig Currie. No parking is permitted along our part of the street, but we already are affected by increased traffic on and near Cretin. Traffic safety concerns have increased accordingly.

My comments pertain to the lack of commitment on the part of St Thomas to mitigation efforts described in "Event Management Plan" and "Traffic Management/Safety". Perhaps elsewhere in the EAW there are references to the City of St Paul monitoring, or UST self-monitoring and reporting its mitigation efforts and I missed them. If monitoring is not explicitly required, that is an important omission.

Examples of vague, non-committal language are below:

With respect to an Event Management Plan, UST is "planning to collaborate with city partners and actively engage neighborhood associations" A commitment to collaborate and actively engage would be more reassuring, especially when the use of terms like "collaborate" and "actively engage" leave plenty of wiggle room for UST as it is.

Under Traffic Management/Safety, several event management recommendations are "proposed" and are "expected" to be updated.

Of course, my comments assume that somehow UST can be held accountable subsequent to the opening of its facility for undertakings made by it in the course of obtaining necessary City approvals. On the assumption that there is recourse, there should be enforceable promises of tangible and meaningful mitigation plans with consequences for breach.

Diane D. Malfeld

Sent from my iPhone

From: Miriam <miriamj999@gmail.com>

Sent: Saturday, November 2, 2024 8:51 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Subject: EAW comment

You don't often get email from miriamj999@gmail.com. [Learn why this is important](#)

PEDESTRIAN SAFETY

The increase in traffic will create a major pedestrian safety issue for blocks around the Arena. Pedestrians, wheelchair users and cyclists will not be safe along Cretin Avenue, Mississippi River Boulevard, Summit Avenue and the west end of Grand Ave.

Additionally, the pedestrian safety issue will be increased on the many smaller residential streets around the proposed new Arena. There is already an existing safety issue with the steady and heavy traffic increase from the nearby Highland Bridge site.

Please note that not everyone is blessed with being spry and able-bodied. Not everyone is able to immediately assess and then instantaneously react to oncoming traffic. Those with mobility impairments are particularly vulnerable.

From: Kathryn Mitchell <mitch040@msn.com>
Sent: Friday, November 1, 2024 11:07 AM
To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>; melvincarter@ci.stpaul.mn.us; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: Fw: Revised EAW for new arena at St. Thomas

Some people who received this message don't often get email from mitch040@msn.com. [Learn why this is important](#)

Resent to these 3, as it did not seem to go through 1st time.

From: Kathryn Mitchell <mitch040@msn.com>
Sent: Friday, November 1, 2024 10:58 AM
To: StThomasArena <EAW@ci.st.paul.mn.us>; Melvin <Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <ward4@ci.stpaul.mn.us>; Daniel Kennedy <info@advocates4rd.org>
Subject: Revised EAW for new arena at St. Thomas

Dear concerned people of Saint Paul,
Thank you for this opportunity to address a most pressing concern for the future of our beautiful and beloved city and especially the Mississippi River corridor.
After reviewing the new EAW proposal major concerns remain ignored and again dealt with in an arbitrary approach. Below is a list of my concerns.

1. Hockey attendance. The EAW projection of numbers does not include all of the many people who will be in attendance, including: medical and emergency staff, security personnel, custodial staff, referees, trainers, box office and ticket takers, vendors to name a few.
2. Heat. There is no mitigation of the massive amount of ongoing Alheat that will be produced by this project. While the EAW talks of tree planting, there will actually be a net loss of 66 trees without replacement and storm water will be dumped into the Mississippi River!
3. Alternative energy. While the EAW claims that it will use photovoltaic technology, wind and battery storage, there is actually nothing of the sort proposed for the arena.
4. Snow removal. The EAW describes using the system in place to remove snow and ice.

This means massive amounts of very damaging salt added to the Mississippi River.

5. Glycol. The use of this toxic substance is known to be harmful and the PCA has no approved safeguards.
6. Traffic congestion. Living just across the street on Summit from the new arena gives a bird's eye view of the many issues that are evident in this plan. While there are actual laws to prohibit large heavy truck and vehicles from using Summit Avenue, somehow St. Thomas has never been subject to these limits and this will only increase with considerable uptick in volume of activity going forward.

From: david O'Brien <davesob1@yahoo.com>

Sent: Sunday, November 3, 2024 2:44 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>; #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>

Subject: Inadequate EAW for the new St. Thomas arena

You don't often get email from davesob1@yahoo.com. [Learn why this is important](#)

This is Dave OBrien. I live on Princeton Ave, two blocks from the south campus of St. Thomas. I'm writing to say that the EAW prepared for the new arena at St. Thomas is not complete or adequate. The new arena will result in big changes for this part of St. Paul. The project needs to complete an EIS in order to address the negative impacts.

I'm sympathetic to situation St. Thomas has placed itself in. They want to increase their physical presence and operations in order to maintain and grow their student population. (All the higher education institutions in the US are facing similar pressures to keep their student numbers.) Meanwhile, they have grown tremendously over the past forty years and have run out of space. They have the Mississippi River corridor to the west, and established residential neighborhoods on the north, east and south sides. There currently is no space in the core campus area for growth. It's now pretty much a zero-sum game for the University versus the residential neighbors. Any gain for St. Thomas will come at the expense of their residential neighbors.

St. Thomas has chosen to go ahead and build the arena regardless of the impact on the adjacent St. Paul neighborhoods. They have minimized and misrepresented the impact of the arena hoping to push the arena through, without allowing the adjacent neighborhoods to address the negative impacts. Our city council representative, Mitra Jalali, has chosen to ignore her constituents' concerns with the project. She does not respond to any of the many requests to talk with her. She does not answer letters from her constituents. The only alternative for the neighborhoods is to count on the legal protections that come with an EIS.

There are many deficiencies in the EAW. Some that I am thinking of today include the following:

- Since the core campus is in a residential neighborhood, there is no established throughfare for all the traffic. All the other Division 1 and professional sport venues in the Twin Cities are adjacent to throughfares. Cretin Ave. can't support the increased traffic volumes without compromising local access. In winter, with snow on the streets, there will be a sufficient slowdown to the point of it being a public safety issue. Emergency response vehicles won't be able to operate quickly enough.
- The St. Thomas plan is to wait until the arena is done, and traffic problems are happening, to devise a strategy to fix the problems. It will be too late then. The inevitable problems need to be identified and addressed before any events take place. If that doesn't happen, the city will end up with an unsolvable situation.
- There is no space for adequate parking. The local neighborhood streets will have parking bans.

The current EAW has deliberately misrepresented what the parking needs will be by providing artificially low numbers of cars and low projections for the number of events at the arena. The events at the arena will present the city with regularly occurring parking disasters.

- St. Thomas has talked about creating an Event Management Plan. But they have yet to come up with any realistic plan. This should be expected because there won't be any possible plan that would work. Given the restricted space situation, there is no way to accommodate 5,000+ event attendees. It will be a guaranteed and unacceptable failure.
- St. Thomas is counting on leasing the arena for concerts and other commercial events. This does not comply with current St. Thomas zoning.
- St. Thomas has said there is no incompatibility with nearby land uses. Therefore, the EAW says there is no need for measures to be included in the project plan to deal with incompatibility or public risks. This simply is not true. There will be huge impacts on the larger community. An EIS needs to be done to address the shortcomings of the project.

Regards,
Dave OBrien

From: Tim Parke-Reimer <tparkereimer@gmail.com>
Sent: Monday, November 4, 2024 9:05 AM
To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>
Cc: Melvin Carter <Melvin.Carter@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: St Thomas arena - environmental assessment worksheet concerns

Some people who received this message don't often get email from tparkereimer@gmail.com. [Learn why this is important](#)

Dear Josh,

I am writing to voice my concerns regarding the environmental assessment worksheet for the St. Thomas's arena, especially as it pertains to car parking and increased traffic.

I live in the neighborhood just south of UST between Cretin and Cleveland Avenues. One of the qualities I value about this neighborhood is its walkability. The arena EAW does not adequately address how UST will handle the increased traffic to and from the arena, and it assumes that the additional parking needs will just get absorbed by the surrounding neighborhoods.

I am appealing to you to ensure that the arena plan provides for additional parking so as not to increase traffic congestion in the surrounding neighborhoods as event attendees search for parking. I also am requesting that additional measures be made to ensure that pedestrians have safe ways to cross Cretin Avenue beyond the existing traffic lights at Grand Ave and St. Clair. Cretin Avenue is difficult to cross even now during busy traffic times, and I expect it will only get worse as traffic increases from both Highland Bridge and the arena.

Thank you for your attention to these requests to ensure planning is put in place that supports the neighborhoods surrounding the arena.

Tim Parke-Reimer
2122 Princeton Ave
Ward 4 resident

From: BRUCE PEDALTY <brucekeys@comcast.net>

Sent: Thursday, October 31, 2024 2:32 PM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Subject: St Thomas University Arena

You don't often get email from brucekeys@comcast.net. [Learn why this is important](#)

Hello. I am writing to you about my concerns regarding the arena that is under construction and the deleterious effect it will have on the environment and traffic in my neighborhood. St Thomas will soon be playing hockey in the NCHC conference. That conference includes last year's national champion, Denver, as well as teams from Duluth, St Cloud State, and North Dakota. I would expect that most games will be at or near capacity. The parking at the arena site is vastly inadequate, as are the access roads. The neighborhoods surrounding the University will be inundated with traffic, cars looking for parking, as almost all surrounding streets have no parking restrictions on weekends. There is also no lodging close to this area, almost all attendees will drivers.

I support The ARD organization, and all the details they have unearthed about this flawed project and lack of proper environmental review and permitting. I ask that you delay the approval or consider restricting attendance to the levels that access streets and available parking can support.

Bruce Pedalty
2234 Fairmount Ave.
St Paul MN 55105

From: [Kate Richtman](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Cc: Mayor.melvin.carter@ci.stpaul.mn.us; [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward3](#)
Subject: Comments to EAW re: UST's Multipurpose Arena
Date: Tuesday, November 5, 2024 2:32:54 PM
Attachments: [Comments to EAW regarding UST Multipurpose Arena.pdf](#)

You don't often get email from krichtman@aol.com. [Learn why this is important](#)

Dear Mr. Williams:

Attached is the PDF of my written comments to the 2024 Update for the University of St. Thomas Multipurpose Arena Environmental Assessment Worksheet (EAW).

Sincerely,

Kathryn Richtman

KATHRYN S. RICHTMAN
1939 PORTLAND AVENUE
ST. PAUL, MN 55104
KRICHTMAN@AOL.COM

November 3, 2024

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102

RE: St. Thomas University's Lee and Penny Anderson Multi-Purpose Arena project

Dear Mr. Williams:

As the City is aware, this is the second Environmental Assessment Worksheet (EAW) completed for the proposed University of St. Thomas (UST) Lee and Penny Anderson Multi-Purpose Arena (hereinafter Arena) project.¹ The first Environmental Assessment Worksheet (hereinafter First EAW) was approved by the City of St. Paul on June 27, 2023.

In its rejection of the City of St. Paul's First EAW, the Minnesota Court of Appeals found that the City's negative Environmental Impact Study (EIS) determination was arbitrary, capricious, and unsupported by substantial evidence because the City failed to consider the Arena as part of a phased action. *See, In re City of St. Paul's Decision on the Need for an Environmental Impact Statement for the Proposed University of St. Thomas Multipurpose Arena.* (Minn. Ct. App. July 8, 2024).

In remanding the matter to the City of St. Paul, the Court of Appeals also found that the City's negative EIS determination was arbitrary, capricious, and unsupported by substantial evidence because the City failed to consider the Arena's potential environmental impacts as a result of parking, traffic, and Greenhouse Gas emissions. In addition, the Court of Appeals found the City's negative Environmental Impact Study determination was arbitrary, capricious, and unsupported by substantial evidence because the recommended mitigation measures were not

¹ It is difficult to refer to the Arena as "proposed" at this juncture because, despite the lack of a valid EAW, the University has continued construction of the Arena, and the City of St. Paul has failed to halt that construction. Therefore, as of the writing of these comments, construction continues.

specific, targeted, and certain to be able to mitigate the environmental effects as required under Minn. R. 4410.1700 (2023).

The second EAW was published on October 8, 2024 (hereinafter "Current EAW"). These comments are submitted in response to the Current EAW.

Minnesota Rule 4410.1400 (B) provides in pertinent part that "The [Responsible Government Unit] shall be responsible for the completeness and accuracy of all information." Thus, the City of St. Paul, as the Responsible Government Unit, has the responsibility to ensure the Current EAW is both complete and accurate. The Current EAW is neither complete nor accurate for many reasons. Moreover, many of the recommended mitigation measures are not specific, targeted, and certain to be able to mitigate the environmental effects as required under Minn. R. 4410.1700 (2023). These comments are confined to the Current EAW's incompleteness and/or inaccuracies regarding its failure to address critical environmental issues in three significant ways.

1. The Current EAW fails to provide sufficient mitigation efforts caused by the "Heat Island Effect" and removal of mature trees to existing habitat.

Page 10 of the Current EAW states, "Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council's Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat."

However, the Current EAW fails to adequately address what effect this dense concentration of paved surfaces and buildings will have on the environment. Although it states, on page 12, that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect," UST will be eliminating, or has already eliminated, at least 193 mature trees. (See Table 5, page 17 of Current EAW). Planting 127 saplings in place of these 193 mature trees will have little impact on the heat island effect for many years. Moreover, there is no assurance that all the 127 saplings will be planted on the South Campus. Therefore, this measure is inadequate because it fails to address how UST will mitigate the heat island effect on the South Campus.

In addition, removing 193 mature trees as part of the Arena, Schoenecker, Microgrid, and Seminary parking projects is detrimental to the birds who depend upon this habitat. Only UST's South Campus is in the Bird Area and the Mississippi River Corridor Critical Area. The elimination of 193 mature trees from this area is a serious loss to an ecologically fragile site. The effect of this loss of habitat on migratory and non-migratory bird species has not been studied. Therefore, the Current EAW is incomplete.

2. The Current EAW does not address the dangers of using toxic refrigerants in an Arena that is mere feet from the Mississippi River Gorge, ignoring significant environmental risks.

Page 13 of the Current EAW states, “The following measures provide increased reliability and energy efficiency in the Arena to reduce emissions:

- Redundant chiller design and incorporation of glycol into supply loop for all cooling coils will protect from freezing conditions and ensure systems remain operational.
- Chillers will use next-generation refrigerants with low global warming potential.”

Page 38 of the Current EAW states, “The chilled water system for the building will have two chillers, one 500 ton and one 112 ton, located within the sublevel mechanical room of the building. The 500 ton chiller will hold approximately 800 pounds of refrigerant, the 112 ton chiller will hold approximately 137 pounds of refrigerant, and the chilled water piping system will have approximately 4,000 gallons of a fluid that is 30% ethylene glycol and 70% water within the system piping. For the ice rink cooling system, there is anticipated to be approximately 1,200 pounds of ammonia and approximately 6,000 gallons of a fluid that is 40% glycol and 60% water. The project proposer will obtain the appropriate permits from the MPCA.”

The use of the refrigerants ethylene glycol and anhydrous ammonia are not “next-generation” refrigerants. They are toxic chemicals. According to experts, “Ethylene glycol is a clear, colorless syrupy liquid. The primary hazard is the threat to the environment. Immediate steps should be taken to limit its spread to the environment. **Since it is a liquid it can easily penetrate the soil and contaminate groundwater and nearby streams**” (emphasis added).² Anhydrous ammonia is a toxic gas or liquid that, when concentrated, is corrosive to tissues upon contact. Exposure to ammonia in sufficient quantities can be fatal.³

The “proposed” location of the Arena lies within an especially fragile environmental habitat. The Arena would sit approximately 40 feet uphill from the area commonly referred to as “The Grotto,” and drain directly into the Grotto area. (See pages 25-26 of Current EAW). The Grotto area includes a stream with an unrestricted flow directly into the Mississippi River. As quoted above, ethylene glycol is a liquid that “can easily penetrate the soil and contaminate groundwater and nearby streams.” Thus, a spill of either or both of these substances presents a clear danger to the environment.

“Low global warming potential,” as stated on page 13 of the Current EAW, does not alleviate the need to examine other environmental risks associated with these toxic substances. Although the Current EAW states on page 38 that the “project proposer will obtain the appropriate permits from the MPCA,” as it relates to the ice rink refrigerants, there are currently no such permits and no evidence that the Minnesota Pollution Control Agency will approve such permits.

² <https://cameochemicals.noaa.gov/chemical/8660>

³ https://www.cdc.gov/niosh/erashdb/emergencyresponsecard_29750013.html

It has been over 16 months since the First EAW was approved by the City. Yet no explanation is given as to why the necessary permits from the MPCA have not been obtained. In fact, no such MPCA permit is even listed in Section 9 of the Current EAW. (See, Permits and Approvals Required Section, p. 17). The failure to obtain MPCA approval makes the Current EAW incomplete.

In addition, page 49 of Current EAW states, "There will be safety plans in place to handle the ammonia use appropriately." This statement ignores the fact that the EAW is the document that, by law, is required to specifically state what those plans are so that a complete and accurate assessment of all risks to the environment can be made. UST's vague promise regarding future plans does not meet the standard of specificity, accurateness and completeness required of a valid EAW.

The Current EAW fails to address the potential for serious damage to the environment, as well as significant harm to wildlife and human life. A spill or leakage of the toxic refrigerants needed to keep the ice rinks continually frozen would be catastrophic. Without a proper environmental plan approved by the MPCA, the Current EAW is not only incomplete, it is fatally flawed. Given the fragile environment of this location, an EIS is needed.

3. The Current EAW does not properly address the potential for water pollution.

Page 28 of the Current EAW states, "There are no surface waters located within the project site (see Figure 7). No trout streams or lakes, wildlife lakes, migratory waterfowl feeding and resting lakes, or outstanding resource value waters are located within the project site or within one mile of the project site."

This is an inaccurate statement, ignoring the fact that the project site is adjacent to the Grotto, which includes a stream that has an unrestricted flow into the Mississippi River. The adjacent Mississippi River provides drinking water to millions and supports fish and other aquatic species. Therefore, the Current EAW is incomplete as it fails to accurately and adequately address the potential for polluted water to flow directly into the Grotto, the Mississippi River Gorge area and the Mississippi River itself.

For all the reasons stated above, I respectfully request that the City of St. Paul determine an EIS is needed prior to approval of the Arena Project. In the alternative, I request the Current EAW be returned, corrected for inaccuracies and supplemented and corrected so as to be complete.

Respectfully Submitted,


Kathryn S. Richtman

From: [Bill Richtman](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Comments on UST Arena 2024 EAW
Date: Wednesday, November 6, 2024 4:41:49 PM
Attachments: [EAW 2024 Comments of William Richtman.pdf](#)

[You don't often get email from brichtman@aol.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Mr. Williams,

Please find attached public comments on the Lee and Penny Anderson Multi-purpose Sports arena 2024 EAW.

Thanks for your attention to this important matter.

William C Richtman

November 5, 2024

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102

RE: The University of St. Thomas Lee and Penny Anderson Multi-Purpose Arena 2024 EAW

Dear Mr. Williams:

The State of Minnesota through the Environmental Quality Board (EQB) requires sports arenas designed or expected to accommodate a peak attendance of 5000 to have an environmental review of the proposed project before any permits can be issued. (Minnesota Administrative Rule 4410.3100, Subp. 1). This is known as the environmental assessment worksheet (EAW) and is required to determine if the cumulative effects to the environment are sufficient to require a more extensive Environmental Impact Statement (EIS). The University of St Thomas (UST), the proposer of the Lee and Penny Anderson Multi-purpose Sports Arena (Mega-Arena) was aware of these requirements when the 5,500 seat Mega-Arena was planned. UST, with its vast array of academic excellence chose not to use it to produce a proper EAW and instead produced a document which begs many questions, leaving an incomplete EAW for public comment.

The EQB has designated the City of St Paul as the Responsible Government Unit (RGU). The RGU must determine if the EAW submitted by the proposer is complete (Rule 4410.1400). The City of St Paul and its agents also have a fiduciary duty to the citizens of St Paul to ensure a complete EAW is produced. Although the current EAW has been certified as accurate and complete by signature of the City's agent, it is manifestly neither accurate nor complete and must be sent back to the proposer.

1. The THE 2024 EAW Fails to Address Necessary Climate Considerations

Re: Section 7. Climate Adaption and Resilience and Table 2. Climate Considerations and Adaptations.

Does not answer the question of how it will adapt to the recognized heat island effect because it fails to acknowledge that it is adding to that effect by the removal of 1.6 acres of permeable surface including the removal of 193 mature trees (Table 5, page 17) which provided a cooling effect through evapotranspiration. There will be no net gain in mitigation of the heat island effect as claimed. This statement is incorrect and with the addition of 1.6 acres of impervious surface on the site and mature trees impossible to replace the heat island effect will only be worsened.

Section 14b and Table 8. State Listed Threatened and Endangered Species.

The list includes Handsome Sedge (Endangered), Kentucky Coffee Tree (more accurately the Kentucky Coffee Tree) and Swamp White Oak (both of Special Concern) all found on the project site but with no description of their disposition. Thus, the EAW is incomplete.

Section 17b. Vehicle Emissions. Discuss the project's vehicle-related emissions on air quality.

The discussion lists four air pollutants: carbon monoxide, hydrocarbons, nitrogen oxides, and particulates. However, the EAW discusses only one of the pollutants: carbon monoxide. It fails to discuss hydrocarbons, nitrogen oxide or particulates, all included on the proposer's list. And all of serious environmental concern. The EAW is incomplete under Rule 4410.1200 (E) for failing to identify the potential environmental impacts of ALL the pollutants. There is no provision in the EAW rules for incomplete answers. Further under Rule 4410.1600 (B) which addresses written comments, it states, "The comments shall address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation before the project is commenced." It is impossible to address the accuracy of information that is not presented as required. It is also impossible to identify potential impacts that may warrant further investigation of the potential cumulative impacts of these pollutants. The RGU must attest that the EAW is accurate and complete by signature (EAW, page 64). The signature, which fails to recognize the EAW as deficient, must be withdrawn until a complete and accurate document is published for public comment.

Section 17b. Identify measures that will be taken to minimize or mitigate vehicle-related emissions.

The EAW completely fails the requirements of the EAW form by ignoring this vital section entirely without providing one word of strategy to minimize or mitigate the previously admitted harmful effects of vehicle emissions.

It fails under Rule 4410.1200 (E) because it does not address "potential environmental impacts and issues that may require further investigation before the project is commenced, including identification of cumulative potential effects."

It fails under the provisions of Rule 4410.1400 (B): "The RGU shall be responsible for the completeness and accuracy of all information." The RGU cannot possibly vouch for the completeness and accuracy of information that is manifestly missing.

It fails under Rule 4410.1600 (B) which addresses written comments. "The comments shall address the accuracy and completeness of the material in the EAW, potential impacts that may warrant further investigation before the project is commenced." It is impossible for a reasonable person offering written comments to vouch for the accuracy of information that is required but not provided. It is, however, possible and required under Rule 4410.1600 (B) to address the completeness of the EAW - it is incomplete.

Therefore, under Rule 4410.1700. Subp. 2a, which addresses EAWs with insufficient information, the RGU must either make a positive decision on the need for an EIS or postpone the decision on the need for an EIS in order to collect the lacking information

2. The THE 2024 EAW Fails to Address Necessary Transportation Effects and Required Mitigations

Transportation Analysis

The 2023 EAW traffic analysis failed to analyze traffic approaching from the south, primarily along Cretin Avenue, a major arterial street that intersects the campus. UST, however, has not ignored an approach to campus from the south, including it on its official website providing directions for visitors. The 2024 EAW focuses on only one intersection south of the campus, the unsignalized intersection of Goodrich Avenue and Cretin Avenue with recommendations for improvements to that intersection. But between Goodrich and Grand Avenue, which has rightly received much attention, lies Lincoln Avenue. Lincoln Avenue will provide a convenient outlet for frustrated drivers heading north who are stuck in event congestion. This "escape route" will only cause problems elsewhere. The transportation analysis is incomplete without so much as providing a traffic count from the south where housing density is increasing and the traffic along with it. Under Rule 4410.1600(B) the EAW as it currently exists is incomplete and, therefore, cannot be accepted.

Transportation Analysis Addendum

Traffic Operations: St Paul Seminary (SPS) Parking Lot. The addendum assumes that the SPS is currently using the Anderson Parking Facility (APF) citing the 2023 EAW as authority for this assumption. The 2024 EAW claims that the proposed SPS parking lot will free up 73 parking spaces for events. However, there is no mention of the SPS displaced parking in the 2023 EAW. Therefore, the assumption regarding displaced SPS parking is not supported by the record, is incorrect and cannot be used to support the assertion that 73 additional spaces will be available for event parking. Therefore, the 2024 EAW is flawed and does not provide the necessary accurate information to make an informed decision by the RGU.

Appendix D. UST Campus Utilization Counts

The parking counts provided in the 2024 EAW are seriously flawed because they are too limited to be reliable. In September 2024 SRF Consulting updated their Transportation Analysis. The so-called update relied on the same faulty parking analysis as the 2023 EAW. The 2023 EAW collected less than a week's worth of data to make a year's worth of projections. Besides that, SRF admitted the data was collected during a snowstorm. A reasonable person would not consider such a small sample size plus the outlier of a snowstorm to provide accurate information necessary to make an informed decision. The parking analysis fails for this reason and is not acceptable under Rule 4410.1600 (B).

Throughout the planning process of both the 2023 EAW and the 2024 EAW, UST has struggled with how to handle a desired APF connection to the Mega-Arena. The connection was first shown in the 2023 plans along with a statement that the APF was designed to have

two more floors added. Adding two floors to the APF would replace the 365 parking spaces removed from the UST South Campus (See 2024 EAW, p. 54). However, that would not address the need for a connection from the APF to the Mega-Arena.

UST removed the skyway connection from the APF to the Mega-Arena in the 2024 EAW plans, asserting that there is no financing or Board approval for improvements to the APF at this time. The 2024 EAW, however, includes Appendix A, Table 10 entitled "Proposed Mitigation Strategies and Improvement." This table includes the heading "Infrastructure" and states, as a potential mitigation measure, that UST will "implement alternative access solution to APF if necessary." This could be a worthwhile mitigation recommendation, but it also means it must be considered part of a phased action or a continued action of the overall project and as such must be included in the 2024 EAW (Rule 4410.1000. Subp. 4). Simply put, UST cannot have it both ways. Either the 2024 EAW must be corrected to include reconstruction of the APF or, without specific plans for reconstruction, it must be removed from consideration as a mitigation strategy. As the 2024 EAW exists today, the vague statement that UST will "implement alternative access solutions to the APF if necessary" is not a specific, targeted or enforceable mitigation strategy because there is no commitment to do anything.

In addition to failing to address critical parking deficits by adding two floors to the APF, UST's failure to include a skyway to the APF poses serious safety concerns for pedestrians. Without a skyway connection, pedestrians walking to and from the APF will be crossing in front of vehicles entering and leaving the ramp before and after events. Not only is this dangerous for pedestrians, but it will add to traffic congestion. A skyway connection to the Mega-Arena would ameliorate congestion and improve safety. In removing the APF connection from the plans entirely, the 2024 EAW fails to address serious congestion and safety issues and is, therefore, incomplete.

Rideshare, Transit and Shuttle Plans

This proposal appeared in the 2023 EAW. As was the case more than a year ago, the 2024 EAW shows no verifiable contract with any rideshare company. A contract that doesn't exist is unenforceable as noted by the Minnesota Court of Appeals on July 8, 2024 when it remanded the 2023 EAW to the RGU for correction and completion. It would be inadvisable for the RGU to accept this unenforceable "mitigation" strategy in the 2024 EAW.

Provide Communication on Alternative Transportation Options

Commendable but unenforceable and therefore does not qualify as a mitigation strategy.

Reduce Resident Parking Permits

There are currently 369 unrestricted parking spaces on city streets near campus. These parking spaces receive heavy use and SRF Consulting, acting as UST's agent, provided no study of on-street demand for parking. There is no evidence that reducing permit parking in the Morrison Hall ramp won't shift those vehicles to the street. After all, they have to go somewhere. Thus, this does not qualify as a mitigation strategy.

Provide Advanced Notice, Online Classes, and other Strategies with Parking Ramp Clearing
Other Strategies? What other strategies? If UST has other strategies they need to be produced here and show they are part of a targeted, enforceable mitigation plan. Again, vague unenforceable proposed strategies do not meet the standards required Rule 4410.1600 (B). Thus, this does not qualify as a mitigation strategy.

Provide Off-site Parking and Shuttle Services

Negotiations are not signed contracts and provide no assurance that an enforceable contract will be signed. More than a year after the 2023 EAW was rejected by the Court of Appeals because there were no enforceable contracts, the 2024 EAW contains the same fatal flaw. The 2024 EAW does not show any signed contract or enforceable agreement with any entity to provide parking. Therefore, just as the 2023 EAW was deficient, the 2024 EAW is deficient. It does not include any enforceable contracts for parking and/or shuttle service and, therefore, once again does not meet the standards required to qualify as a mitigation strategy.

UST chose to defy the decision of the Minnesota Court of Appeals – a decision upheld by the Minnesota Supreme Court – by continuing to build its Mega-Arena. Now, more than a year later, UST has still failed to provide the required information for a complete and valid EAW. This is a testament to UST's disregard for the environmental laws of the State of Minnesota – laws designed to protect the environment and the citizens of this State. Now, it is up to the City of St. Paul as the RGU to follow environmental law and protect its citizens.

Respectfully submitted on November 6, 2024 by



William C. Richtman
1939 Portland Avenue
St. Paul, MN 55104
brichtman@aol.com

From: [Craig Roen](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: EAW Comment
Date: Wednesday, October 30, 2024 1:03:26 PM
Attachments: [UST Arena Comment_Roen.docx](#)

[You don't often get email from craig.roen@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello Josh:

I inadvertently sent to you a draft of my comment, not the final version. I have attached the final to this email. Please confirm receipt and that you will replace the previous version I sent to you with the one below. Apologies for the inconvenience.

Regards,

Craig Roen

UST Arena Updated EAW (Sept. 2024) Comment

To: Joshua Williams, City of St. Paul, Lead Planner for UST Arena

From: Craig Roen, 183 Mount Curve Blvd., St. Paul

Date: October 30, 2024

Please accept this email attachment as my comment in response to the Updated EAW (Sept. 2024) prepared on behalf of the University of St. Thomas and in relation to the arena currently under construction on UST's South Campus.

My comment will focus solely on on-campus and neighborhood parking issues. This comment takes into account the fact that the Updated EAW currently includes no requirement that UST provide additional parking beyond what is now available on campus.

The Issue

St. Paul Ordinance, Sec. 164.04 sets forth its residential parking policy. It is intended to protect the health, safety and welfare of residents who live near areas of non-residential use that do not provide adequate parking. It specifically references resident safety and protection from polluted air and excessive noise, among other things. The entire ordinance is quoted at the bottom of this memorandum.

The Updated EAW analysis, as it relates to parking, is based upon several debatable assumptions regarding on-campus parking availability. However, even if those assumptions are correct, the Updated EAW omits a key factor: the inevitable and actual parking *behavior* of event patrons.

Specifically, event patrons will seek: (1) free parking over paid parking, (2) easy "in/out" parking over UST ramp and surface lot parking that will inevitably be choked during major events, and (3) the convenience of parking close to the arena rather than being bussed from remote locations. These factors will undoubtedly encourage event patrons to drive up and down nearby residential streets looking for free, convenient parking. In the language of the ordinance, it will cause "serious residential problems."

Event patrons' parking behavior is not speculative. It is evidenced by students who seek out free parking near campus, and it happens every time there is a home football game. This is true even though UST offers free parking in the Anderson ramp for home football games. (See, <https://tommiesports.com/sports/2022/8/14/football-parking.aspx>). The parking policy for its home basketball games also provides for free parking at the Anderson ramp, but only on the weekends. (See, <https://tommiesports.com/sports/2022/8/14/mens-basketball-parking.aspx>).

If UST follows suit with these existing parking policies once the arena is built (and it appears it intends to per the Updated EAW at p. 60), then only the Anderson ramp will be available for free event parking, and on a limited basis. Once that ramp is full, event patrons will be required to use on campus paid parking facilities, or in the alternative, park for free on neighboring streets. As experience has shown, football fans clog the neighborhood directly west of the stadium with (often illegally parked) vehicles and with overflow into other neighborhoods. It is reasonable to assume the same will hold true for major indoor sporting events, but now the neighborhood streets adjacent to the South Campus will be clogged with event patrons looking for free parking spots.

Further, the Updated EAW specifically states: “*For post-event conditions, the total clearing times of the APF ramp are expected to increase from 15-30 minutes to 20-35 minutes.*” This would be in addition to the lengthy delays and back-ups on Cretin, Summit, Grand and Cleveland Avenues. As such, event patrons will inevitably drive up and down neighboring streets looking for parking that allows for easier “in/out” access.

Finally, regarding the proposed bussing and alternative transport mitigation measures, the Updated EAW provides only speculative numbers, apparently not tethered to any research. It also lacks a specific action plan. The proposal of free bus tickets (not confirmed as something Metro Transit would agree to) and shuttles from bars (without any commitment from, or established agreements with, a single business), or discounted ride sharing (based only upon “preliminary discussions”) is just smoke. And even if these proposals were to come to fruition, the overall impact would be nominal.

Therefore, regardless of how the numbers have been crunched, this key *behavioral* factor should have been considered and mitigation plans should have been included to address event patrons’ rational behavior. In other words, the rational behavior of event patrons will cause congestion, pollution and safety hazards in the surrounding residential neighborhoods, something that the Updated EAW should specifically address.

Proposed Mitigation Measures

I propose three mitigation measures beyond what is currently included in the Updated EAW, each dependent upon the other:

- 1. For all UST arena events, *all* on-campus parking should be free of charge for event ticketholders.**

This would at least *somewhat* level the playing field. It would give event patrons the opportunity to park close to the arena, on campus, and without cost. Further, the cost to UST would be self-limiting: UST’s lost parking revenue would be limited to ticketholders who choose to drive to events.

Support for this mitigation measure can be found in the Updated EAW which represents that current on-campus parking availability is sufficient to meet the needs for most events. This is good as far as it goes, but UST should *incentivize* event patrons to fill those spots with an offer of free on-campus parking.

2. Before and during UST arena events, UST should place temporary signs directing event patrons to on-campus parking.

On Oct. 23, 2024, I observed orange and black temporary signs at several locations near the South Campus that announced: “UST EVENT PARKING” with directional arrows. A photo is at the bottom of this document. So, clearly UST can place temporary signage specifically related to event parking. This would go a long way to direct event patrons to on-campus parking and away from the surrounding neighborhoods.

3. Before and during UST arena events, temporary “no event parking” signs should be placed in and around streets surrounding and near the UST arena to disburse off-campus event patron parking to minimize its impact on the neighboring community.

UST may claim it has no authority to place signs limiting parking on a temporary basis. However, there appears to be no City ordinance preventing the City from placing these types of signs as needed. The City clearly exercises its authority to do so as evidenced by the fact they are already used for a variety of routine municipal purposes. In the alternative, it may grant itself explicit authority. Municipalities regularly employ this parking management tool. Indeed, Minneapolis has expressly granted itself that authority:

§ 70.36 TEMPORARY NO PARKING.

(A) *When parking is prohibited.* It shall be unlawful for any person, as driver or operator of a vehicle, or as the registered owner of a vehicle, to park, stop or leave standing, whether knowingly or unknowingly, any vehicle upon any public street where temporary restricted parking signs have been posted or notice placed upon such vehicle to be moved. Vehicles left in the areas which have been posted as temporary restricted parking for more than 12 hours after the posting may be towed.

Minneapolis’s website specifically references “special events”:

<https://www.minneapolismn.gov/getting-around/parking-driving/street-parking-meters/street-parking-rules/parking-signs/>

To the extent UST *and* the City are serious about addressing UST neighbors' concerns and solving the problem, the Updated EAW should include a plan for placement of temporary signage during UST arena events. Indeed, UST should commit to using its *best efforts* to work with the City to develop and implement a reasonable, effective plan.

St. Paul's Residential Parking Policy

St. Paul's residential parking policy is in line with these proposed mitigation measures. They are consistent with City policy as it relates to residential parking management, as set forth in the City's ordinances:

Sec. 164.01. - Declaration of public policy and purpose.

The council of the city finds that there are residential areas within the city which are adjacent to or very near intense nonresidential uses which do not provide adequate off-street parking. The council further finds that persons employed by or using those nonresidential facilities frequently park their vehicles on nearby residential streets, resulting in serious residential problems. This parking ordinance regulating parking in designated residential areas is hereby established for the safety of the residents and to protect real and personal property from damage by reducing hazardous traffic conditions resulting from the heavy usage of these residential streets by nonresidents or transients; to protect those residential areas from polluted air, excessive noise, trash and refuse caused by the entry of such vehicles; to promote efficiency in the maintenance of those streets in a clean and safe condition; to preserve the character and integrity of those areas as residential districts; to protect the residents of those areas from unreasonable burdens in gaining access to their residences; and to preserve the general health, safety, and welfare of those residential areas.

These goals and proposed mitigation measures should be adopted by UST, supported by the City, and specifically included in the Updated EAW.

A temporary event parking sign located at Cleveland and Grand Avenues, Oct. 23, 2024, is pictured below.



November 15, 2024

Via Email (StThomasArena_EAW@ci.stpaul.mn.us)

Josh Williams
Principal Planner
City of Saint Paul
25 West Fourth Street
Saint Paul, MN 55102

Re: Comment on updated EAW for St. Thomas arena
Our File No. 31271

Dear Mr. Williams:

I represent the Saint Paul Seminary, and I am writing to provide comments of the Seminary on the updated Environmental Assessment Worksheet for the proposed University of St. Thomas Multipurpose Arena.

By way of introduction, the Seminary is a Minnesota non-profit corporation that owns certain real property immediately adjacent to the St. Thomas campus and the land on which St. Thomas proposes to build an arena. While the Seminary and St. Thomas collaborate in certain ways in the pursuit of their own institutional missions, they are distinct legal entities in all respects, and they independently own, operate and develop their respective real estate holdings.

The Seminary is currently developing a new 73-stall parking lot on its property. That project falls below all thresholds for mandatory environmental review, and it has already received conditional site plan approval from the City, an erosion control permit from the Capitol Region Watershed District, and an NPDES authorization from the Minnesota Pollution Control Agency. Construction of the parking lot is planned to begin in early 2025.

St. Thomas, as the Proposer of the arena project, and its consultant included information about the Seminary's parking lot project in the updated EAW. This includes referencing the parking lot project in the Project Description in Section 6 of the EAW. The Seminary was not provided with a draft of the updated EAW before its was submitted to the City.

To be clear, the parking lot is not part of the proposed arena project, and it is also not a "connected action" under Minn. R. 4410.0200, Subp. 9c. More troubling, however, is the inclusion of the parking lot project in Section 9 of the EAW, which enumerates the permits and

approvals required for the project under review. This appears in Section 9 of the updated EAW, which states,

List all known local, state, and federal permits, approvals, certifications, and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. *All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules Chapter 4410.3100.*

Section 9 of the updated EAW proceeds to list not only the various approvals needed for the arena, but also all of the approvals that the Seminary requires for its parking lot project. As a consequence, under the italicized language above, the updated EAW purports to bar the issuance of the approvals that would allow the Seminary to construct the parking lot on its property until St. Thomas completes all required environmental review of the arena it proposes to build on its property.

As the quoted language above is part of the form EAW that is provided to project proposers by the Environmental Quality Board, it may be the case that the list of necessary project approvals was prepared without recognition of the prohibition in the final, italicized sentence in that paragraph. In any event, there is no legal basis for the inclusion of the parking lot project in Section 9, and certainly no legal basis for an EAW to prohibit the issuance of approvals for a project that is to be undertaken by someone other than Proposer, on land owned by someone other than the Proposer.

In light of the foregoing, the Seminary requests that the City clarify in its response to the public comments on the updated EAW and through the findings and fact and resolution on the need for an Environmental Impact Statement that the approvals needed for the Seminary's parking lot project should not have been included in Section 9 of the updated EAW and that the prohibition on final government decisions under Minn. R. 4410.3100, Subp. 1, does not include final governmental decisions needed for the parking lot project.

Very truly yours,



Mark Thieroff

612-337-6102 | Direct
markthieroff@siegelbrill.com

From: [Katherine Cairns](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Cc: [Josh Williams](#); [Tom Darling](#)
Subject: SARPA comments on UST EAW
Date: Thursday, November 7, 2024 12:32:13 PM
Attachments: [SARPA statement UST EAW 11.7.24.pdf](#)

You don't often get email from kacairns007@gmail.com. [Learn why this is important](#)

Josh-

The Summit Ave Residential Preservation Association (SARPA) Board has reviewed issues identified in the Updated University of St Thomas (UST) Arena Environmental Assessment Worksheet (EAW) and provides the attached comments and request for consideration of changes in the UST Arena EAW. We respectfully request these changes to protect St Paul's Summit Avenue- a parkway, park and residential area protected by a federally designated historic district.

Thank you for your consideration.
Katherine

--

Katherine A Cairns
1992 Grand Ave. St Paul, MN 55105
651.492.1994



November 7, 2024

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102
[StThomasArena EAW@ci.stpaul.mn.us](mailto:EAW@ci.stpaul.mn.us)

Re: Concerns regarding the proposed updated **University of St. Thomas EAW in the West Summit Avenue Historic District**

Dear Mr. Williams:

The Summit Avenue Residential Preservation Association (SARPA) is dedicated to the preservation of the historic, residential, and the urban park character of Saint Paul's historic Summit Avenue. The SARPA board of directors on November 4, 2024 approved the following statement of concern regarding the proposed/updated **University of St Thomas Environmental Assessment Worksheet (EAW) in the West Summit Avenue Historic District.**

Specific concerns that need to be added/addressed in the EAW include the following

- Page 23- Policy LU-54 of the City of St Paul 2040 Comprehensive Plan “aims to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution-owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and bicycle access.” The proposed 5,500 seat Division 1 basketball/hockey arena is oversized-for the proposed location, especially considering that the University of St. Thomas has an existing 5,000 seat basketball arena in Schoenecker Arena. The UST documents indicate that between 900-1,650 cars (with 2.75 fans/car) and 5-12 team/fan buses (20,000 gross vehicle weight each) and 5-8 large vendor trucks (22,000-30,000 gross vehicle weight) will use neighborhood streets for each event at the arena with only ONE proposed entrance/exit to the location off to Cretin Ave. The Summit Avenue exit is the only other remaining access road to/from the south block. ***The Summit Avenue exit/entrance has weight restrictions established by the St Paul City Council. It was designated as a “Parkway” with a maximum vehicle weight of 9,000 pounds. City designated parkways are to support “the maximum enjoyment by all persons and protect the natural resources therein”. (St Paul Leg. Code 170.10).*** The University of St Thomas and St Paul Seminary staff have indicated that the second Cretin Ave. access road and the Seminary access road to Mississippi River Blvd. are for restricted use and will be gated. The proposed traffic volume of cars, buses and heavy-weight trucks into this two-block area will increase traffic congestion on Cretin Ave. and put pedestrians and bicycle riders at risk of accidents, especially during late afternoon/ evening games. Uber/Lyft users and drivers going to/from this south block also have no safe parking/loading area in the EAW response. Emergency vehicle access within the south block is severely limited due to the locked gates on the second Cretin access road and Mississippi River Rd access road. This lack of adequate access roads for cars, trucks, team buses, emergency vehicle/EMS vehicles, and Uber/Lyft vehicles poses life-safety risks to attendees and neighbors. **SARPA strongly encourages the City of St Paul and the University of St. Thomas to require non-gated access to a second Cretin Avenue exit (for busses and trucks) and a non-gated access to Mississippi**

www.sarpa.org
board@sarpa.org

River Blvd.(for Uber/Lyft and drop off vehicles) to reduce life-safety risks during hours when the arena and facilities are in high use.

- Page 46- The EAW is to *describe any project-related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.* Glaring omissions are noted in the UST EAW response with diminished respect for the impact of visual effects (lights) and vehicle traffic lights on west Summit Ave, a designated national historic district. Vehicles exiting from the UST south block onto Summit Avenue shine headlights directly into residential houses at night on Summit Avenue. To reduce reported current and potential increasing glaring headlights of vehicles on Summit Avenue residential areas, more access to Cretin Avenue and Mississippi River Blvd are needed. **SARPA strongly encourages the City of St Paul and the University of St. Thomas to require non-gated access to a second Cretin Avenue exit (for busses and trucks) and a non-gated access to Mississippi River Blvd.(for Uber/Lyft and drop off vehicles) to reduce residential areas impacted by the visual effects of the project.**
- Page 53- Construction Noise has been reported by neighbors by the west block/arena site as early as 6am, which is contrary to what is claimed by the UST EAW. **SARPA strongly encourages the City and UST to enforce the 7am start time for construction in light of existing neighborhood complaints in 2024.**
- Page 54- The proposed St. Paul Seminary surface parking lot was understood to be used for seminarians, not as additional game day parking for the University of St Thomas as noted in the EAW. Concerns were raised about income generated for this preferred parking area on game days and whether that is benefitting the St Paul Seminary or the University of St Thomas. This parking area has the potential to be an Uber/Lyft and drop off/pick up location for events to reduce circling vehicles seeking parking/pick-up/drop off locations. **SARPA strongly encourages the City, the St. Paul Seminary, and UST to utilize the proposed Seminary parking lot as an Uber/Lyft and drop-off/pick-up area during high attendance events.**
- Page 55- The effect on traffic congestion on affected streets around the proposed arena site should require a separate Traffic Impact Study. Vehicle trips for each event will exceed 3200 trips based on the UST reported traffic estimates. **SARPA is especially interested in the impact of the additional traffic on Summit Avenue, a weight-restricted road in a park, residential, and federally designated historic area.** The description of the traffic mitigation notes that a second access driveway will be constructed by UST on the Southeast block of Cretin Ave for pedestrian access, emergency vehicles and potentially for buses. **SARPA requests that this second access on Cretin Avenue be left un-gated and be the primary access for buses, trucks and vehicles exiting the arena block, consistent with reducing the weight of vehicles on Summit Avenue.**

Thank you in advance for your consideration of requiring additional work/clarification from the University of St. Thomas of these concerns to protect Summit Avenue- a parkway, park and residential area protected by a federally designated historic district.

Summit Avenue Residential Preservation Association

Thomas Darling, President and its Board Members Katherine Cairns, Francis Luikart, Robert Muschewske, James Goman, and Harry Walsh

From: [Lee Schafer](#)
To: [*CI-StPaul StThomasArena EAW](#)
Subject: St. Thomas Arena -- comment on Updated EAW
Date: Thursday, November 7, 2024 1:37:33 PM

You don't often get email from lee.a.schafer@gmail.com. [Learn why this is important](#)

Hello

I have lived with my family in the neighborhood south of the University of St. Thomas since the early 1990s. I have not been active in the group called ARD that has opposed the Multi-purpose Arena now under construction on the South Campus. However, I have read the revised EAW and have some comments.

The EAW, as updated, doesn't seem like a very good work product. Maybe it's because the arena is under construction and the City and UST want to meet what's required by spending as little time and money as possible. If I had to highlight one issue, it's the inadequacy of the analysis and impacts for the costs of St. Thomas's plan to accommodate the cars of all the event attendees, an inadequacy that suggests a failing of basic common sense.

The EAW disclosed preliminary discussions of ride-share and transit options. The EAW disclosed free parking in Anderson Parking Facility onsite but only for weekend events. The EAW forecast "clearing times" at Anderson increasing after events to up to 35 minutes.

This is what we know about incentives: People do respond to them. "Free" parking beats parking with monetary fees. Convenient car parking close by beats subsidized transit and ride-share, even if such options had been worked out. Walking five minutes into the neighborhood and then quickly exiting the area in your car beats idling 35 minutes in a traffic scum.

I have seen a proposal a neighbor worked out, three steps that have to work together. I strongly agree with this proposal. One, onsite parking at UST (anywhere on campus) needs to be free for event attendees, every day and for every event. Two, ample event-day signage needs to be put up to direct people to the onsite parking, with similar information shared with users when the tickets are sold. And three, streets adjacent to the site should have temporary "NO EVENT PARKING" restrictions on event days, clearly marked. Enforcement is a question -- sadly, norms about how to behave and follow rules seem to have slipped a lot lately -- but the City staff may have some solutions to that enforcement problem.

Of course it's true that there are very few things that are truly "free" to the consumer, and it's also true that somebody else is often bearing some or all of those costs. What UST has decided, disclosed in its own EAW, is that it's going to push a lot of cost for parking that it did not want to provide on to people who have happily coexisted with St. Thomas for years. There is a tipping point, for reasonable neighbors living next door to an institution like UST, and this feels like a totally unnecessary shove past it.

Thank you.

Lee Schafer
2237 Sargent Avenue
Saint Paul, MN 55105
(612) 812-0242

From: Paul Schanfield <paulschanfield@gmail.com>

Sent: Thursday, October 31, 2024 10:15 AM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Subject: St Thomas Arena should not be built where it is proposed

You don't often get email from paulschanfield@gmail.com. [Learn why this is important](#)

Please help:

A college/university that is right in the midst of a neighborhood and near a national treasure of the Mississippi River should NOT BE ALLOWED TO BUILD AN ARENA THAT WILL POLLUTE THE RIVER AND DESTROY OUR NEIGHBORHOOD BY CONGESTION OF THOUSANDS OF PEOPLE ATTENDING EVENTS WITH NO PLACE TO PARK! It is my understanding that not only is there no new parking for thousands of cars but some of the current campus parking is being eliminated to build the arena.

Please, please stop this!

Best regards,
Paul Schanfield, M.D.
Karen Schanfield
85 Otis Lane, St. Paul

Comments on the Update for University of St. Thomas Multipurpose Arena Environmental Assessment Worksheet (EAW)

Steve Sikora, 173 Montrose Place, St. Paul, MN 55104 – November 1, 2024

The University of St Thomas dramatically understated the number of events and attendance figures in both the original 2023 Environmental Assessment Worksheet (EAW) and again in the revised 2024 EAW.

The assumption of mostly 20-50% capacity events, and of hosting only a limited number of UST-only games, was used as the basis for all studies undertaken in the Environmental Assessment Worksheet. However, UST's grossly understated attendance estimates and frequency of use assumptions, are serious omissions of fact that, statistically minimize every other measure of impact from the Penny and Lee Anderson Multiuse Arena. EAW headings most skewed by the faulty data include the sections: Air, Greenhouse Gas Emissions, Noise, Transportation, Cumulative Potential Effects and Mitigation. Despite the fact, that one year after publication of the first EAW we know much more about UST's planned uses of the arena, statistical assumptions used in the EAW remain unchanged in the 2024 revision. The flawed baselines put forth by UST purposely and effectively nullify the findings of the entire document.

UST's assertions, both unquestioned by the City of St. Paul, are attendance and frequency of events. As the designated (RGU) Responsible Governmental Unit charged with approval of the EAW, it is the duty of the City to question the validity of UST's claimed, projected uses of the arena. The EAW states that the City has reviewed the assumptions, yet the worksheet does not come close to disclosing the full extent of use this facility will provide.

An existing pre-event and post-event peak hour trip generation was estimated for a maximum capacity event at the project site, which would be an event held in the Arena, based on assumptions that were discussed and **reviewed by UST and City of St. Paul throughout the study process.** (EAW page 54)

It is the duty of city government to consider the veracity of all assumptions put forth by the University of St. Thomas, because these assumptions directly influence the results of the studies in the EAW. Furthermore, an accurate measure of arena use cannot be reflected in a snapshot of the initial months of operation. A comprehensive understanding of environmental impact must take into account a mature facility and all of the consequential, future burdens upon city services and stresses on the neighborhoods, in perpetuity. Particularly, when future use has already been publicly announced in the press.

If poorly forecasted arena use was accidentally overlooked in the first EAW, there is certainly no excuse for it in a court-ordered, revised version. Yet, this revised EAW attempts to further minimize the perception of arena use and impact.

From "Introduction"

Since the publication of the negative declaration on the need for an EIS on September 26, 2023, the size of the proposed Arena has decreased slightly. The total size of the Arena was reduced from 270,000 GSF as listed in the 2023 EAW to approximately 252,000 GSF. The maximum attendances for hockey and basketball events have changed from 4,000 and 5,500 to 4,005(2) and 5,324(2) respectively. Non-athletic events such as commencements could still be arranged for seating of approximately 5,500 seats, depending on the stage configuration. Seating for 4,523(2) could be provided in “end stage” configuration and 5,500(2) for a “center stage” configuration. For the purposes this 2024 EAW Update, the proposed size and/or capacity of the Arena used for the 2023

From “Introduction” footnotes

(2) The seat counts listed are based on the latest Arena design plans dated July 24, 2024 and are subject to change as design continues to advance.

From “Introduction” (Page 3)

However, where relevant, the 2024 EAW Update will note potential effects of the decreased project size and/or capacity.

The Introduction implies that since the first EAW was completed, the arena has been reduced or modified in ways that make it less environmentally intrusive. It states that arena size and seat count have dropped incrementally below the original 270,000 (GSF) gross square footage estimate down to 252,000 GSF and from 5,500 seats down to 5,324 seats, implying that the impact would be less significant than originally anticipated. At-a-glance these statistical highlights appear to be a concession to the court of public opinion and those opposed to the project, but the changes are insignificant.

Attendance

While providing some PR value, the minor downsizing in overall square footage of the building and reduction in the precise number of seats are of little consequence when it comes to the real-world environmental impact of events being held in the facility. The issue here, is the relative scale of the facility insitu, not the difference between 5,334 seats and 5,500 seats. If the fire code permits 5,324 seats then that is the best measure of potential for attendance. Since attendance is speculative, the EAW should be addressing the greatest potential for attendance rather than the most conservative estimates as provided by UST. The attendance numbers (which also affect traffic, parking, pedestrian traffic and so on) does not include standing room tickets, or participants, or the number of people in support and service positions such as; referees, food service, custodial staff, security, box office, medical teams, trainers, etc. This arena, while relatively small compared to a professional sports stadium, is a behemoth when shoehorned into a small campus, sequestered in a residential neighborhood. The arena events and commuting spectators will be a chaotic disruption to the residential streets near campus and will repeatedly become a major source of traffic congestion on Cretin, Summit, Grand and River Boulevard before and after every event. At arena events that approach full-capacity, as the EAW’s

Traffic Study admits, the traffic LOS will be rated as E-F, gridlock for 20 to 30 minutes pre and post events. This is undisputed. But what UST would like the public to believe is that this LOS problem will be a rare occurrence. However, when seen in the light of the actual number of capacity events, not just games, but events, it will be the norm rather than the exception. During the span of each and every LOS E-F level event it will be impossible for police, fire and emergency vehicles to pass through the 6 affected intersections, for a period of 20-30 minutes, in times of crisis, posing a threat to life and property.

Without question, there will be more events and far larger crowds than proposed in the EAW. One UST claim of capacity sporting events alone is 35 games.

Which brings us to the second significant issue with the EAW, the gross understatement of the number of major events that UST put forth as the basis of studies.

(Table 14) suggests that there is ample available parking, noting only a possible 3 games in which attendance will exceed available parking. The threshold for available parking is defined as games over 3,000 spectators. But UST's "available parking" in itself, is a shell game foisted on the public. UST has never disclosed the total number of spaces on campus and how many of those spaces are already committed to UST permit holders. Based on UST's website we know that St. Thomas is a commuter school. 2/3rds of students (approximately 6,100 students) and all faculty drive to campus. Students, including those living on campus not lucky enough to win the lottery for parking permits, already park their vehicles in the surrounding neighborhoods. Outside of the approximately 777-space Anderson Parking Ramp no explanation as to where the available parking spaces are or how spectators will be directed to them exists. The revised Mitigation Strategy in the EAW (page 7 of the SRF Memorandum No. 16489) mentions a "smart parking system." It shows a sample screen with lot locations and available spaces but fails to explain how that would work or if a phone app would be developed. And if a phone app was created, how it would be adopted by spectators of all events. Along with attendance and frequency of event assumptions, UST's parking projections are so opaque that they simply cannot be verified.

Reasons to question UST's attendance projections:

1. Having 40-years of experience in the field of design, specifically design and branding for national retail clients such as Target, Apple, Dayton's, Macy's and other major retailers. During my career I had the opportunity to collaborate with world renown architects and practitioners in all areas of design. A universal concept in every discipline of design, be it retail store planning, packaging, display, events, signage, print publications, communications, presentations, websites, apps or product design. Design is based on purpose. Things are not designed in an arbitrary manner, whose purpose is to be determined later. The very foundation of design is understanding the specific intended purpose, then discovering and defining solutions that serve that purpose best. In fact, a phase in the process of design is called discovery, where purpose is carefully studied prior to any planning or design. It is certain that UST chose to build a 5,500-seat arena because through its own

discovery process it determined the need for a venue of that scale. One builds a 5,500-seat venue only when expecting 5,500 attendees.

2. Whether you are a commercial enterprise, or a non-profit it would be fiscally irresponsible to build a 5,500-seat arena when a 2,500-seat arena would suffice. If a typical game routinely hosted 2,500 attendees and only one big game per year required a 5,500-seat arena, it would hardly justify the cost to build an arena 1/3 again the size required. The optics of a half-filled arena would not look good for the brand image either. So perhaps a 3,000-seat arena would be built. Clearly UST chose to construct a 5,500-seat arena because a majority of events will require 5,500-seats.
3. When an institution spends over \$175 million on a sports arena it will have a great responsibility to fill it as often as possible to pay for the facility, its changeovers and maintenance. To justify its existence and the already anticipated future uses, the term “multipurpose arena” was specifically employed, rather than “sports arena.” Like the 5,500-seat size, this descriptor too, is no accident. Even though the Attendance Analysis statistics only refer to games, specifically UST games, clearly there are other intended uses that are being glossed over. However, in the press and in neighborhood council meetings, over the past year, numerous mentions have been made of other kinds of events. These other events would be rentals to generate income for UST. Commonly suggested events included high school sports and commencement ceremonies. But lucrative rental opportunities like concerts and even conventions have been proposed. Why are these kinds of events not included anywhere in the statistical impacts of the arena? Events that utilize the arena floor could easily generate attendance numbers at or above the 5,500-seat mark. And the vehicular traffic necessary to support such a range of diverse events would be considerably different, and potentially greater than the fleet of support vehicles related to sporting events. More trucks onsite as well as a greater number of spectator cars, since students will not necessarily be among the attendees.
4. In UST’s own words, both Division 1 sports and the arena are expensive:

Anderson Arena Funding nears completion as St Thomas adjusts to D1 costs (Tommiemedia, October 31, 2023) <https://www.tommiemedia.com/anderson-arena-funding-nears-completion-as-st-thomas-adjusts-to-d1-costs/>

In the article, Senior Associate Athletics Director, Ben Fraser touted the growing following for UST sports:

Fraser says that other examples like the nearly 1,000 St. Thomas fans who were present for the football team’s away game at Harvard on Sept. 16 further demonstrate the athletics department’s progress in developing a dedicated Division I following.

The piece mentioned the already burgeoning cost of D1 athletics:

But this differentiation has come with a price tag. The \$17 million in spending reported in the university’s EADA report for 2021-22 was over triple the cost of typical operating expenses when St. Thomas was in Division III.

UST students will bear some of the cost with a \$300 athletics fee for undergraduates. But as relief Fraser added:

The new arena will also generate revenue through use for commencements, concerts and rentals of the arena's second sheet of ice. Much of the money from these rentals will go towards covering the costs of maintaining the new complex, according to Fraser.

Clearly commencements and community sports will not alone generate the much-needed revenue to maintain the arena and support Division 1 programs. So...

Frequency of events

In articles in the press and mentions in neighborhood council meetings, UST has been dropping hints about the many potential uses for its new arena. On January 20, 2024 in the *UST Neighborhood Relations Newsletter* Assistant Dean of Student Life, Josh Hengemuhle, wrote:

The arena will provide new opportunities for St. Thomas to partner with local public and private schools, youth sports organizations, nonprofits, businesses and other organizations. **Our goal is to create a new economic asset** for the benefit of the community.

The key words being "economic asset," not one for the community, but for UST.

On May 15, 2024, long after the 2023 EAW was approved, the National Collegiate Hockey Conference made a surprise announcement on their website under the headline: NCHC Adds University of St. Thomas as Newest Member Beginning in 2026-2027. <https://nchchockey.com/news/2024/5/14/mens-ice-hockey-nchc-adds-university-of-st-thomas-as-newest-member-beginning-in-2026-2027.aspx>

It declared: With the addition of St. Thomas, the NCHC will become a 10-team conference in two seasons when the Tommies are officially welcomed as an NCHC member on July 1, 2026.

"St. Thomas's institutional vision and commitment to nationally competitive hockey, as well as their central location in our footprint and new facility, make them an ideal fit," NCHC Commissioner Heather Weems said.

UST's desire to achieve Division 1 status drove the need for a gigantic new arena. The arena and Division 1 designation in turn demanded enormous financial resources. That fiscal pressure assures the highest number of lucrative, rental events possible.

"On behalf of the Board of Directors, I am thrilled to welcome the University of St. Thomas to the NCHC. St. Thomas is an excellent institution of higher education that will add academic and competitive value to our conference," said University of Nebraska at Omaha Chancellor and Chair of the NCHC Board of Directors Dr. Joanne Li. "Since transitioning to the Division I level, St. Thomas has made significant investments into its athletic department and facilities that has positioned its hockey program well to compete successfully in the NCHC."

The announcement that UST Men's Hockey was being ushered into a more competitive conference included some of the school's qualifications: The University

of St. Thomas is located in Saint Paul, Minn. and has an enrollment of 9,146. The Catholic university, which first opened in 1885, has produced approximately 115,000 alumni, with more than 85 percent residing in the Twin Cities metro area (read driving distance). St. Thomas is located in a top-15 media market nationally that is home to six major professional sports teams. The Tommies themselves sponsor 21 Division I sports, including men's and women's ice hockey, with the majority of their other sports in The Summit League.

A dense concentration of local alumni guarantees exceptional crowds at UST D1 games. There is ample evidence in the press that the EAW's low attendance projections need to be honestly reconsidered by the City. Perhaps an EIS is the only way to ascertain the truth.

UST Hockey Attendance Projection Changes

Men's Hockey games will increase in number and those games will be at or near capacity. The following chart labeled "Figure 2 – Attendances per Men's Hockey Conference" shows a 2023 comparison between the CCHA and NCAA conference attendance which puts the average attendance for the new conference at 4,700 spectators, a number that exceeds the capacity of the UST arena in hockey configuration. In other words, every Men's Hockey game can be expected to be a full capacity game. And the EAW fails to mention the potential for tournaments in its projections.

Yet (On page 57) Table 14: Event Parking Demand Analysis by Attendance still shows statistics from the 2023 EAW.

The table, used to dispel the need for parking mitigation estimates attendance by sport and claims the following crowd sizes by number of games.

5,500 - 4,500 (2)

4,499 – 3,500 (19)

3,499 – 2,500 (2)

2,499 – 1,000 (26)

66 total games

While Appendix D, Figure 2 – Attendances per Men's Hockey Conferences demonstrates a marked increase in attendance between an average attendance game in UST's current conference CCHA which is 2,475 versus average attendance at a NCHC conference game of 4,700, where UST will be competing in two more seasons.

An inaccurate assumption put forth in the original EAW and repeated here is that there will be only 1 or 2 "full-capacity" games held in the arena per year (page 57). But those statistics are contradicted by estimates related to attendance at NCHC games published elsewhere in the EAW. Remember, no fiscally responsible institution would build a 5,500-seat arena for a routine crowd size of 2,000 spectators. That's not how design works. That's not how fiscal planning works. Even common sense tells us it is wrong.

(On page 56) Table 13: Event Parking Demand Analysis by Event Type

There is a table entitled “Estimated Attendance at: Thursday/Weekday Night, Friday Night, Saturday Night,” there is no mention here or anywhere else in the EAW of Sunday afternoon hockey games which already appear on the current 2024-2025 Men’s Hockey Schedule.

https://tommiesports.com/services/schedule_txt.ashx?schedule=392

How can a traffic and parking analysis be accurate when it neglects one full day of the week?

The City of St. Paul is responsible for the accuracy of the EAW

It is the obligation of the City as RGU to anticipate all arena uses including future ones, not just the ones UST wants us to examine, because the City and its tax paying citizens will be left to pay the price when the true impacts of the arena play out.

Minimized attendance estimates and frequency of use projections, particularly when left un-mitigated, will only create traffic and parking mayhem on a regular basis.

Furthermore, full-capacity events will not be required to clog neighborhood streets with spectator’s cars. Because the revised EAW still assumes the use of “nearby on-street parking near to campus” (page 56). It admits that even under capacity games up to 2,600 attendees will require neighborhood streets to host attendee’s cars.

But false assertions by UST attempt to deceive. Parking (based on attendance assumptions) (Page 56)

Key findings indicate that approximately 54 of the 66 anticipated sporting events are expected to have a parking surplus, without any mitigation measures. Of the 12 games where a parking deficit is expected, 9 are expected to only have a deficit of 35 spaces.

Despite the detailed Transportation Study undertaken by SRT the baseline assumptions used in the study are pure conjecture on the part of UST, meant to diminish the perceived impacts of the facility and events. These figures are greatly diminished. Men’s NCHC Hockey alone will create 17 full-capacity games!

Apparently, the City knew about this. At least the EAW sclaims it is so. (Page 19 of the Transportation Study, drafted June 9, 2023 and unchanged in 2024) states:

Various event-related assumptions were developed through discussions with UST and the City of St. Paul throughout the study process. These assumptions lay the framework for the event conditions analysis, to help identify (or mask) problem areas and potential mitigation. The following event background/assumptions are summarized in the following section.

In the EAW under the heading “Current Events” are bulleted a list of UST men’s and women’s sports, venue and current attendance numbers. Men’s football games were listed first, possibly because of the much higher attendance numbers ranging from 4,000 to 6,500

patrons. Of course, football events will not take place in the arena so I have to assume football was included only to demonstrate that UST is already hosting high attendance games on campus. What is not mentioned however, is that football games occur on clear streets in the fall of the year and that there are only about 6 home games. Football games were never included in SRT's Traffic Study. For neighbors on the Shadow Falls side of campus these games are a significant disruption, caused by spectator traffic, parking and noise associated with football games. In fact, during games the narrow, winding streets in the neighborhood become unintentional one-way streets, clogged by cars entering from both ends. During football games even permit parking rules are ignored, and the City does not monitor permit parking after 5:30PM. This situation has only been tolerable to the neighborhood because there are so few football home games, and they are not held in winter. However, the seasons for hockey and basketball, the two primary sports to be played in the new arena, include the entire span of snowy winter months, in which driving and parking are anything but normal, even without the looming specter of on-street arena parking. The Transportation Study does not address one-side of the street parking in winter for example.

How can a traffic and parking analysis be accurate when it neglects the season of heaviest use and the season of most inclement weather?

2024 EAW Transportation Analysis Addendum (with Mitigation) MAP Figure A3

The map shows that even with Mitigation, congestion/queuing is expected to occur for 20-30 minutes prior to a capacity event. 6 intersections showing LOS of E – F.

Under capacity events show minimal LOS at major intersections. But these events will still rely on residential streets and cruising spectators in search of elusive parking spots. The maps don't reflect any impacts on the neighborhoods, each of which will become an extension of UST's "available parking" strategy, reliant on routine use of residential streets.

Other Events

Rental events may comprise a majority of arena events off season. But the only mention of non-UST events in all 464 pages of the EAW taking place in the **Multipurpose Arena** is on (page 9 of the UST Multipurpose Arena EAW Transportation Study) under the heading Non-Athletic Events, where it is quickly dismissed.

The primary scheduled, reoccurring use of the Arena is for basketball and hockey events and therefore this use was selected as the focus of the EAW transportation analysis. While other event types could have similar capacities, due to the infrequency and unknown nature of these events, they were not the focus of the EAW. To offer additional insight into potential events beyond UST athletics, the following summary provides an overview of other anticipated at the Arena.

UST Commencements (6 sessions), High School Commencements, **External Events**, Career Fairs/Conventions, Youth Sports Practice/Games, Youth Sports Camps, Club Room Rentals

In the list of potential “External Events” concerts are listed. Concerts in a center stage seating configuration have a capacity of 5,500-seats, end stage configuration has a capacity of 4,523 seats. These are all potential full-capacity events. Why would they not be included in the transportation study?

The City of St. Paul has gotten it wrong before. This time it won’t be so easy to rectify.

What might appear to be overlooked details are really lapses in foundational data. Incorrect baselines have grave consequences, and there is a real-world St. Paul model to prove the point. A very similar situation arose a few years ago when the St Paul Planning Commission approved a Starbucks drive-thru for a congested lot on the busy intersection of Snelling and Marshall. Anyone who lives in that part of town will remember the traffic chaos that ensued for a period of two years until the drive-thru was ultimately shut down.

The circumstances were eerily similar, in that Starbucks hired its own traffic engineering firm to do a traffic study. Any local resident could have (and did) warn that the line for the drive-thru would quickly outpace the service window and block traffic paralyzing that busy intersection. The Planning Commission could not see it.

The Starbucks drive-thru was the subject of two articles in which former commissioner Bill Lindeke, apologized for the Planning Commission’s failure in the matter. In that case, as now, in the case of the UST arena, the City Council followed the lead of the Planning Commission, who followed the lead of the (experts) since neither governmental body had the in-house expertise to understand the studies they were approving.

In a mea culpa article for MinnPost (on February 17, 2022). Lindeke confessed that neighbors had perfectly predicted the traffic snarl.

Neighborhood concerns were heard, but not heeded. According to Lindeke,

“... arguing about traffic is a matter of authority. When city and county engineers have signed off on a traffic study, as they did in this case, that leaves little room for the public to challenge the findings. Unless you are someone who also has credentials in traffic engineering, professionals almost always trump amateur concerns.”

In a piece Lindeke wrote for Twin City Sidewalks Blogspot (on July 16, 2018) he admitted:

“... the traffic studies from the engineering firm hired by Starbucks...did not have an accurate baseline.” “The fundamental problem was too many cars in too small a space.”

Too many cars in too small a space describes exactly the situation with a 5,500-seat area on the UST south campus, in a residential neighborhood with extremely limited parking, no major thoroughfares, no trains, no parking and no bus transit hub.

Having worked for decades with national chain retailers I am certain that Starbucks

Corporation thoroughly understood the effect its drive-thru window would have on traffic. After all, 9,300 of their 16,482 US stores feature a drive-thru window. The science of it is well understood to their store planners. But the multi-national corporation gave it a shot anyways and the City complied. Starbucks gained two years of drive-thru profits. St. Paul got a headache.

As Bill Lindeke stated in his MinnPost article the Planning Commission would be unlikely to trust public option over expert studies. And to be honest, the Planning Commission is composed of ordinary citizens. The Commission doesn't have the in-house expertise. Nor do they have the political courage to apply their own common sense in such matters (even when the obviousness of the situation flies in the face of the studies.) To be honest, when experts weight in, their answers give the Commission political cover in case of failure. So to challenge studies would be as unlikely as a blizzard in July. As the expert findings go, so goes the Planning Commission. Then the City Council follows their lead as does every other city department and public agency. However, the St. Paul Planning Department should know better.

What no one in city government seems to question is the foundational basis for the studies in the University of St. Thomas Multipurpose Arena EAW; the scope and frequency of events at the arena. Long after the arena is completed, when D1 games routinely draw capacity crowds, the off-season is filled with concerts and other profitable rental events, the neighborhoods are overwhelmed with spectator's cars looking for convenient free parking and boisterous fans, and the thoroughfares and intersections are gridlocked once a week, everyone will wonder how this arena in this location could possibly have been approved.

I end my comments with one final question. What kind of city government defies the will of its own citizens in favor of a private, non-profit entity, one that pays no property taxes, while over-utilizing city services, an entity that erodes the city's fragile tax base in one of its most desirable neighborhoods by defiling it, places long considered to be among the most livable in St Paul with private residences paying some of the highest property taxes in the city?

For the public record, at the time of the two UST Arena EAWs, the responsible city officials include:

Melvin Carter, Mayor

Josh Williams, Principal Planner

Tia Anderson, Principal Planner

Members of the St. Paul City Council

Anika Bowie, Ward 1

Rebecca Noecker, Ward 2

Saura Jost, Ward 3

Mitra Jalali, Ward 4 and Council President

HwaJeong Kim, Ward 5 and Council Vice President

Nelsie Yang, Ward 6

Cheniqua Johnson, Ward 7

Members of the City of St. Paul Planning Commission

Kristine Grill, Chair

Nieeta Presley, First Vice Chair

Jeff Risberg, Second Vice Chair

Mauricio J. Ocha Rosales, Secretary

Troy Hackney

Richard Holst

Nathaniel Hood

Ismail J. Khadar

Jake Reilly

Omar Syed

Elizabeth Starling

Simon Taghioff

Seanne Thomas

Ianni Houmas

Brian Martinson

Luis E. Ortega

Jacy Johnson Becker

From: [Irene Suddard](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: comments on EAW
Date: Thursday, November 7, 2024 4:31:30 PM

You don't often get email from suddard@comcast.net. [Learn why this is important](#)

Nov 7, 2024

To: Josh Williams, Principal Planner
City of St Paul

From: Irene Suddard
2192 Fairmount Av

Regarding: Revised and updated EAW for St Thomas Arena

An EIS is needed for the Anderson Arena! The Arena is not just a St Thomas building with impacts for the campus, it greatly impacts the neighborhood. UST acknowledges that traffic and parking will not be limited to the campus but will affect mobility and parking in the surrounding residential community. One of the parking solutions I read was to limit or “take away” residential parking permits. What?

Whether in the area of run-off and greater potential erosion due to increased paving, increased idling of vehicles, vehicle back-up, the “heat-island” effect, the net elimination of 66 mature trees all of this plus, when you take into consideration the density of the recently constructed, projects currently under construction or soon to be constructed all on the South campus, you see a density of buildings (compared to even 5 years ago) that inevitably produce disruption and need to be thoroughly reviewed, assessed and approved for not only what is being done currently but what the long-term effects will be. A deeper EIS study is needed.

Thank you for taking another look.

From: [Patrick Summers](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Cc: [#CI-StPaul_Ward4](#)
Subject: UST revised EAW - support for UST arena
Date: Thursday, November 7, 2024 4:29:28 PM

You don't often get email from patricksummers@yahoo.com. [Learn why this is important](#)

I have resided on Fairmount Avenue since 2010 (off of Cretin Ave.), and raised our family there. I am a life long resident of St. Paul, and the Mac Grove/Highland Park neighborhoods. I think that UST has been a good neighbor and steward of its campus, and an asset to the neighborhood. I think the revised EAW, from what I understand of it, properly and fully addresses the items noted by the MN Court of Appeals in its opinion. The report appears to be very thorough (more than I'd think necessary for an arena). I hope that the City approves the revised EAW, or whatever is the next step in the process.

I think the new UST arena will be a great asset to the school, its students, the neighborhood, and St. Paul. It's great to see a University investing in the future. While I expect that the new facility may have some effect on the neighborhood, that is part of living in a vibrant and growing city. Change is necessary to continue to attract people and investment to St. Paul. UST is building on its own land, with its own resources. I suspect that a good percentage of UST students learn about St. Paul while at school, and decide to live here.

Thank you

Patrick C. Summers

From: spangsea@aol.com
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: Comment on Updated EAW for St. Thomas Arena
Date: Thursday, November 7, 2024 3:59:17 PM

You don't often get email from spangsea@aol.com. [Learn why this is important](#)

To: Josh Williams, Principal Planner

As a resident of St. Paul, I find numerous instances in it of inadequate responses to citizen concerns re: environmental and liveability impact on the surrounding community. An EIS is needed.

Among these instances are that UST claims no incompatibility with nearby land uses. As a result, the EAW specifically states that no measures are incorporated into the project to mitigate any incompatibility or any risk potential.

Christine Sweet
1848 Selby Ave.

-----Original Message-----

From: Dave Ulve <daveulve@gmail.com>

Sent: Friday, November 1, 2024 1:37 AM

To: *CI-StPaul_StThomasArena_EAW <StThomasArena_EAW@ci.stpaul.mn.us>

Cc: Dave Ulve <daveulve@gmail.com>

Subject: UST Arena

[You don't often get email from daveulve@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

What follows are concerns and comments:

-recent Villager article stated arena will create new economic opportunities for the community. I might be missing something but HOW? It is not like the Xcel Center which has restaurants and bars within close proximity.

-use of remote parking sounds good but common sense tells me people are going to want to park as close as they can. And that means they will park in the neighborhood.

One suggestion was to use lots around Allianz. Will these lots be available long term given planned development for that area? Another suggestion was using mass transit. How many people will walk from University Avenue to the arena in the winter?

The arena will definitely benefit the student experience but at what expense to homeowners. I read awhile back the UST student council president said to the homeowners at a joint meeting "if you don't like it move". My reaction to that was WOW!

Thanks for listening and hoping you are able to overcome the challenges to the mutual benefit of all parties.

Sent from my iPad

From: [Kelly Vinson-Taylor](#)
To: [*CI-StPaul StThomasArena EAW](#)
Cc: [Melvin Carter](#); [#CI-StPaul Ward4](#); [#CI-StPaul Ward3](#)
Subject: St. Thomas Arena EAW
Date: Thursday, November 7, 2024 7:32:09 AM

You don't often get email from kellyvtaylor@yahoo.com. [Learn why this is important](#)

Dear Josh Williams,

Once again the University of St. Thomas has failed to provide an adequate EAW and a more in-depth EIS needs to be completed. I've outlined my reasoning below:

1) The original traffic study was completed in March of 2023 and was not updated for the second EAW. Living one block away from campus on Dayton (between Finn & Cretin), I can attest that traffic has significantly increased over the last 20 months since that traffic study occurred. There have been more car, bike and pedestrian accidents reported on Citizen app in the areas surrounding campus, numerous student rentals have been torn down and turned into duplexes increasing car and foot traffic, and St. Thomas just publicly stated in the last week that they "welcomed the second-largest undergraduate class in two decades which is a 4% year-over-year increase, helping to propel St. Thomas' total student population to a four-year high of 9,445." which adds to the amount of traffic coming and going from campus.

2) The compounding effect of the number of home athletic events occurring on the same days and across campus is not being accounted for in the EAW. All these events will impact traffic and parking in the area especially when they are held at the same time or within a few hours of each other. Take these 3 days for example (11/7 - 11/9). 11/7 - Women's basketball 7pm, 11/7 - Women's Hockey 7pm, 11/8 - Women's Hockey 2pm, 11/8 - Men's Hockey 7pm, 11/9 - Men's & Women's Swim & Dive 11am, 11/9 - Football 1pm.

3) With UST's move to the NCHC conference for hockey, they will play teams from Minnesota Duluth, St. Cloud State, and North Dakota and with those institutions within driving distance of the Twin Cities and being the premier hockey conference, they will draw more fans to the arena than in their existing conference. Again, this will have greater impact on parking and traffic.

4) While UST has analyzed the parking on their campus, the EAW has not done a recent and thorough review of the Parking availability in the neighborhood. The lack of parking on our street has gotten noticeably worse since students returned to school this fall. I can attest that on any given weekday evening and on weekends, our block of Dayton from Finn and Cretin has approx. 3 to 5 parking spots available on the entire block. I know this because when my husband returns home from work after 8pm on weekdays and weekends when parking permits are not required, he struggles to find a spot to park. If that limited availability of parking is expanded to other surrounding blocks, it's hardly enough to accommodate the deficit of on-campus parking the arena will create.

These 4 key points focus on traffic and parking; however this does not even speak to all the other environmental issues this arena will cause. The EAW is incomplete and insufficient in addressing the environmental impacts of UST's construction. Given the scope and scale of this project, that it is so close to the Mississippi river bluff, and in the heart of a vibrant neighborhood, a more in-depth EIS needs to be completed.

Kelly Vinson-Taylor
2127 Dayton Ave.

Sent from Yahoo Mail. [Get the app](#)

November 6, 2024

Josh Williams, Principal Planner
City of Saint Paul
25 West Fourth Street
Saint Paul, MN 55102

RE: St Thomas arena 2024 EAW Comment

On September 26, 2023 the City of Saint Paul approved an Environmental Assessment Worksheet (EAW) for the University of St. Thomas arena. On July 8, 2024 the MN Court of Appeals held that the EAW was inadequate and remanded it for Saint Paul to include the impact of the Schoenecker Center, evaluate greenhouse gases and provide for effective mitigation. This court order required the city to make major revisions to the EAW. In response, the city and UST have made some modest revisions to the EAW but major errors and omissions remain. If the city and UST are unwilling to adequately respond to the Minnesota Court of Appeals decision, I doubt if they will consider my comments, but I will point out the EAW errors anyway.

The basic issue with both EAWs is that in spite of the Court of Appeals' decision, the city has made no effort to review or understand, much less mitigate, the impact of the project beyond the borders of the UST campus. The first, and only, mention of the impact of the arena on the neighborhoods is in TA Addendum page 17. The Project Description, greenhouse gases analysis and mitigation measures are all flawed.

PROJECT DESCRIPTION

First, the Project Description in the revised EAW has been expanded to include not only the arena but the Schoenecker Center, the Center for Microgrid Research and the proposed St. Paul Seminary Parking Lot. The parking lot was apparently added to the Project Description to moderate the overall project's parking impact. However, the new parking lot is fully in the Mississippi River Critical Corridor Area. There is no awareness in the new EAW that this is not simply an extension from 6 to 11.7 acres but into a much more significant environmental impact area. In particular, the parking lot is within the largest migratory bird corridor in the United States. Further, although the project now includes Schoenecker and the EAW acknowledges that events occur there, the only recommendation in the EAW is to "avoid" having events on sports nights. [Interesting that sports take precedence over any educational activity on campus].

GREENHOUSE GAS ANALYSIS

Second, the Court of Appeals stated,

“the project will increase the number of spectators traveling to the St Paul campus by moving the hockey program and events there. By overlooking how spectator travel would impact the project's GHG emissions, the city “entirely fail[ed] to address an important

aspect of the problem. See *Friends of Twin Lakes*, 764 N.W. 2d at 381. The city’s determination that the project does not have the potential for significant environmental effects due to spectator transportation is therefore, arbitrary and capricious.” (page 16)

UST addressed only a modest portion of the Court’s concerns in the new EAW. UST did provide a rough estimate of “non-student cars” based on the locations of its current season ticket holders. The UST estimate totaled 1,037,339 car miles per season producing 341.85 MTeCO₂. Even this massive estimate did not include GHG produced by:

1. student transportation to games (20% of projected attendance)
2. other transportation modes, such as Uber, shuttle buses and Metro Transit used by students and non students
3. travel of opposing teams to St Thomas games
4. travel of fans of opposing teams to the St Thomas games
5. events such as those described in the 2024 Transportation Analysis page 10

The arena construction is a part of a deliberate strategy for UST to become more nationally known. That strategy not only has positive PR implications for St Thomas but has negative consequences for GHGs. The Court did not limit “spectator travel” to only St Thomas fans within the Twin Cities area. Having an opposing team is a necessity in sports and some opposing fans attending are highly likely. By choosing to join D1, and now moving to a more notable hockey conference, UST will be playing teams from all across the country rather than just the Upper Midwest—involving much more travel. In 2023’s *Mankato Motor Sports case*, (A-23-0091) the Court of Appeals considered the proposed creation of a motorsports park. In denying the EAW they stated, “the supplemental EAW did not consider whether the project would increase air travel to and from the Mankato Regional Airport and therefore did not include emissions from air travel in its emissions estimate.” (page 7)

UST and the city have done an inadequate job of assessing the carbon emissions produced by their choice to engage in a more competitive level of sports.

MITIGATION/PARKING

Third, in its July 8 opinion the Court of Appeals totally rejected the original EAW’s claims of mitigation, “we conclude that the [mitigation] measures are not specific, targeted, and certain. The city must address the noted shortcomings on remand.” (page 21). I describe below that the shortcomings of the September 26, 2023 EAW have not been repaired but persist.

The revised Transportation Analysis (TA) has found many changes since the original TA in 2023. On page 2 it notes that “Enrollment on the campus has seen a decline over the past decade but has stabilized...” That statement contrasts with the UST Newsroom website which states shows increases as follows:

- +17% New transfer students
- + 4% First time students
- + 7% Graduate students

The point is not that enrollment has increased but that UST’s goal is to increase enrollment and creating the arena is part of that effort. It is likely that enrollment will continue to increase.

The new EAW also suddenly found more parking spaces on campus. It also found that claims in its original EAW statement on the need for a 5 to 15% surplus of parking does not apply to events. (Notably there is no explanation as to why the 5 to 15% rule does not apply to events.) The new EAW also found that the number of hockey fans would be significantly greater than originally expected because they will be playing in a more notable conference. Even with all these changes the new EAW has found that parking remains no problem.

The revised EAW still does not look at the impact of the arena on the neighborhoods. The mitigations suggested are all mitigations for itself—UST—essentially improvements in its product rather than reducing impacts on others which is the essence of mitigation. St Thomas' so-called mitigation efforts in parking are all efficiencies to ensure there is more campus parking and happy fans (customers) for its sports--pre- paid parking, easier egress from parking lots and smoother exits off campus.

Car parking for event attendees is not the only impact beyond the campus that has been ignored (noise, congestion, trash) but it is the simplest to assess. The revised estimate of parking spaces on campus and on parking along public streets bordering UST is still leaves a shortage of up to 770 spaces. There are several problems with this. The only real option to the parking problem is to do what UST habitually does and dump its problem on its neighbors. UST is essentially claiming control over the parking spaces along its bordering streets and now proposes to extend that control into the neighborhoods. However, UST does not own or control parking on streets bordering its campus and UST does not own or control parking in nearby neighborhoods. Its control is exercised through the acquiescence of the city.

Neighborhoods

The UST arena will create a significant problem for the residents of local neighborhoods. UST has for many years disowned its external impacts. That is why almost all on-street parking within ½ mile of the campus is city permit parking. The Transportation Analysis (TA) of both EAWs are focused on proving there is parking on-campus to accommodate arena fans. Well actually on-campus and also on streets bordering UST, which it counts as its own property. But fans are not interested in seeking that last parking space on campus. I would say that is the flaw in their reasoning except I believe they are well aware that there is little or no benefit for fans to park on campus. The fan wants to park for free and with minimum hassle. To most fans parking in the neighborhoods would be the preference, not a fall back.

Both the 2023 and 2024 TAs include maps showing campus parking within ½ mile of the arena. Both maps (see Figure 1, 2024 TA) also include (in very light type) an estimated number of City Permit Parking spaces, totaling 1,715 (Note; perhaps only half of these spaces are actually within a half-mile of the arena). The TAs include no written mention of these parking spaces presumably waiting to be occupied. But the 2023 TA states that fans are willing to walk up to one half mile to a game. Although they fear to say it, clearly UST plans to drop its arena parking problem on the neighborhoods.

Because UST fears to openly discuss dropping arena parking on the neighborhoods no one has studied the issue. UST assumes neighborhood parking is boundless. There has never been an

assessment of the availability of parking spaces on nearby streets. UST assumes the local streets are available to them at all times. I have walked most of the nearby streets in the evenings and I think they are usually 30-40% occupied by cars. At public meetings proponents of the arena have stated that everyone in the neighborhoods have parking garages. That is not correct. Many people do not have garages, some people have 1 car garages and have two or three cars, other people have disabilities and access to the street is easier or essential. The neighborhoods have also experienced changes from the City's new zoning and housing policies. A new student housing duplex on Goodrich has filled half the block's south side with cars. There is a sober house on Fairmount that typically uses 4-5 spaces. These are just a couple of examples but highlight how UST and the City have carelessly disregarded the impact of arena parking on the neighborhoods. Fans are not likely to drive around the campus looking for spaces when they can simply park in a nearby neighborhood, even if they see a No Parking sign. Real mitigation would include a permit parking enforcement plan.

Because UST fears the results, there is also no study on the impacts of its parking dump on the neighborhoods. As I mentioned above, many residents must park cars on the street. Most don't want to or cannot walk blocks to their home. People in the neighborhoods want to have guests, parties, receive deliveries and have health and safety emergencies—all are more complicated or impossible because of arena parking. Of course, due to the problems with current UST student parking, almost all parking within a half mile of the campus is city permit parking only (Monday-Friday 8:00 am to 8:00 pm). Most St Thomas games during the week start at 7:00 pm. How tempting for fans to park in these permit areas at 6:15 or 6:30 pm and risk a ticket. Why not, not much chance for a ticket and you get free convenient parking. UST and Saint Paul are both collaborating in encouraging people to violate city parking ordinances. Further, the city is calling into question the viability of all permit parking in the city and inviting a lawsuit.

Real mitigation—limiting impacts on the neighborhoods—would be to insure parking enforcement in permit parking areas during prohibited times. There simply is no space for hundreds of cars to park during the week in the neighborhoods. And if there is space why should neighborhoods taxpayers absorb the inconvenience of suburban people parking here and going to a sports event for a nonprofit? What benefit is there for the city? For many people the lure of free on-street parking and not leaving the game from a full parking garage would tempt them to ignore the parking rules. By accepting parking limits on campus and not accessing neighborhood streets the city is encouraging spectator cars to break the law. Any real mitigation would limit the impact of arena parking on the surrounding neighborhoods. Why should neighbors absorb these impacts instead of UST which is building an arena for its own benefit?

CONCLUSION

The city repeatedly says that the final Certificate of Occupancy approval will be the time when mitigation is decided. As the Court pointed out, this is not Minnesota law. Mitigation should be part of the EAW so it can be assessed as part of the decision to approve the project. The city Zoning Committee, Planning Commission and City Council all stated the EAW was not relevant to their consideration of the arena Site Plan. In fact, the city attorney advised that none of these bodies could discuss the EAW with citizens because of its "quasi-judicial" nature. The City and UST have

defied the Minnesota Court of Appeals and have faced no consequences. They have undermined Minnesota environmental law and so far have succeeded.

Donn Waage
2229 Fairmount Ave
Saint Paul, MN 55105

Donnw@yahoo.com

From: amwachter@aol.com
To: *CI-StPaul StThomasArena EAW
Cc: [Melvin Carter](#); [#CI-StPaul Ward3](#); [#CI-StPaul Ward4](#); info@advocates4rd.org
Subject: Impact of the new arena
Date: Wednesday, November 6, 2024 9:02:43 PM

You don't often get email from amwachter@aol.com. [Learn why this is important](#)

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102
StThomasArena_EAW@ci.stpaul.mn.us

Dear Mr. Williams,

I live at 2199 Sargent and am negatively impacted by the building of this huge arena in a very small area. One of my greatest concerns is for the health of the Mississippi River and the environment. With this in mind it is my opinion that St Thomas's EAW is incomplete and insufficient. Perhaps the EAW loosely met the 'minimum' required (initial EAW and the revised EAW). But we can't go with the 'lowest' bar when an arena so large (with chemicals in it) is being built so NEAR the Mississippi. Responsible parties and those that approve such studies should rise to a higher bar....not only the "letter of the law" but the spirit of the law. Bottom line Protect the Environment with the most thorough and complete study. Clearly this project demands an EIS.

Points of Major concern:

* Statements in the EAW by St Thomas saying "No outstanding resource value waters are located with one mile of the project" are quite concerning. The Mississippi River is a **value** water and a national treasure. The river is way closer than one mile. Drainage into the river due to impervious surfaces will increase. The potential danger (disaster) from a ice rink chemical leak must be considered and evaluated thoroughly through an EIS.

*Loss of trees: significant loss of trees in the area where birds fly with **no** replacement trees slated for the South Campus.

* more cars, more vehicles, more buses certainly impact the traffic flow and safety but their increased numbers also have the potential to dramatically impact the air quality and environment.

I feel none of these issues were clearly and precisely addressed in the EAW. with mitigation strategies included. Therefore an Environmental Impact Statement should be done.

Sincerely,
Alice Wachter

From: [Mike Wachter](#)
To: [Mike Wachter](#); [Alice Wachter](#); [*CI-StPaul_StThomasArena_EAW](#)
Cc: [Melvin Carter](#); [#CI-StPaul_Ward4](#); [info@advocate4rd.org](#)
Subject: ARD / EAW UST
Date: Thursday, November 7, 2024 10:38:19 AM

Some people who received this message don't often get email from mikewachter13@gmail.com. [Learn why this is important](#)

Josh Williams, Principal Planner
25 West Fourth Street
Saint Paul, MN 55102
StThomasArena_EAW@ci.stpaul.mn.us

Dear Mr. Williams,

I live at 2199 Sargent and am negatively impacted by the building of this UST arena in our neighborhood.

One of my greatest concerns is for the health of the Mississippi River Valley and our neighborhood environment.

With this in mind it is my opinion that St Thomas's EAW is incomplete and insufficient . Perhaps the EAW loosely met the 'minimum' required. But we can't go with the 'lowest' bar when an arena so large is being built so NEAR the Mississippi. Responsible parties and those that approve such studies should rise to a higher bar....not only the "letter of the law" but the spirit of the law.

Bottom line: ***Protect the Environment with the most thorough and complete EIS study.***

Clearly this project demands an EIS.

"Net loss of 66 mature trees 193 will be removed for Arena, Schoenecker, Microgrid, and Seminary parking. 127 will be replanted, although not necessarily on South Campus. "

"Only the South Campus is in the Important Bird Area and the Mississippi River Corridor Critical Area, so elimination of trees here and planting them elsewhere is a serious loss to an ecologically fragile site. The effect of this loss of habitat has not been studied. The city should not accept any environmental review that does not analyze the effect of this habitat loss of 193 trees on migratory and non-migratory species."

UST should, in fact, be planting many more trees on their property to account for increased CO₂ load produced by the traffic and environmental effects of the entire construction process and altered traffic patterns. One estimate, (Penn St. Univ, Dept of Environ. Studies) is that it would take 730 new trees planted to offset the carbon footprint of a single internal combustion car in use for a single year. Thus, the increase in car traffic associated with the new UST athletic facilities alone would require the planting of thousands of trees each year in a very limited space. Perhaps UST should look at funding tree-planting projects, if not in the immediate neighborhood, but in nearby metro parks.

This is one simplistic approach to addressing the environmental concerns of the proposed UST project, but as a retired biochemist/microbiologist, I feel very comfortable with looking at all kinds of data and consequences of our actions on the existing environmental decisions in a rational analysis. We must be responsible guardians of our environment !

Sincerely,

Michael L. Wachter

From: [Carol Walsh](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: UST 2024 comment
Date: Wednesday, November 6, 2024 11:36:28 AM

You don't often get email from bycarolwalsh@hotmail.com. [Learn why this is important](#)

Dear Mr. Josh Williams:

The City of St. Paul has allowed the University of St. Thomas to continue building the arena despite the adjudicated inadequacy of the 2023 environmental assessment worksheet (EAW); therefore, in my view, opportunities to change the project to mitigate its environmental impact have been lost. The City should stop the construction until this environmental review process is completed. That would allow consideration of project elements with less environmental impact.

Regarding energy sources: The City should require UST to consider clean energy sources as alternatives, including using the building roof to support a solar energy generation station, or using more-efficient geothermal energy. As a newly built facility, there is no reason why UST could not design without relying solely on natural gas and other fossil fuels.

Regarding water quality and other impacts from new surface parking: UST describes the 73-stall surface parking lot as an action connected to the arena project that increases the impacted area to 11.7 acres (revised EAW). MISSING from the current EAW: It does not state that the need for this project is created by the loss of seminary parking spots due to the arena development (pg. 8). MISSING from the current EAW: Discussion of the impact of the loss of more than 190 mature trees (lost to the developments), while only 127 will be replanted (pg. 17-18), a permanent loss of 63 mature trees, while the replanted trees will take over 30 years to provide the benefits of shade and habitat. Although the new parking area will be required to obtain a stormwater construction permit from the state, the revised EAW is MISSING a description of how stormwater from the slope that drains to this area will be managed. The stormwater generated from the parking area surface ("asphalt over an aggregate base") will apparently be directed to a pervious pavement area near stone columns, and from there discharged, without treatment, to the groundwater. There seems to be an assumption that this discharge will have no impact on the bluff's stability or the quality of the groundwater or surface water. Increased vehicle noise and traffic to a scenic parkway area heavily used by bikers and pedestrians will result from the addition of the new parking lot. MISSING: Light impacts are not addressed in the EAW at all. (Based on statements made elsewhere, however, construction plans appear to include tall lighting fixtures that will disrupt the natural appearance of historic Summit Avenue and the Mississippi River parkway and impact light-sensitive organisms that inhabit the natural area.) The WWI monument area is a darker area within the area of urban light pollution. Without mitigation, the new parking area has the potential to significantly impact the nighttime environment.

MISSING from the EAW: Detailed information on the impact on the bluff from the surface parking lot; stormwater, lighting, and view from the parkway and from the cumulative impacts of mass parking in a sensitive, historic area.

Regarding LEED certification: Silver LEED certification, which UST expects the arena to receive, is a relatively low level of environmental commitment. Other, arena projects have done much better, as a Google search will show. LEED Platinum certification, the highest level of LEED certification, represents a commitment to sustainability and environmental leadership. The City should require large educational institutions, particularly those that assert community, integrity and the common good, to meet the highest standards of environmentally-sensitive development.

Respect for Minnesota's laws governing environmental review requires St. Paul to stop building the arena immediately before opportunities for mitigation are lost. By stopping the project, St. Paul has the chance to ensure that UST focus development on what is sustainable, not what will get the university to Division 1 status the fastest way. Applying the law requires St. Paul to either require an environmental impact statement, or require a complete EAW before moving forward with its environmental review decision, or order an EIS based on the fact that the project as designed has the potential for significant, deleterious environmental impacts.

Thank you for your consideration,

Carol Walsh
1834 Laurel Avenue
St. Paul, MN

From: [T.Walls](#)
To: [*Cl-StPaul_StThomasArena_EAW](#)
Cc: [Melvin Carter](#); [#Cl-StPaul_Ward4](#); info@advocates4rd.org
Subject: Updated EAW for St. Thomas Arena
Date: Thursday, November 7, 2024 1:39:44 PM

Some people who received this message don't often get email from walls.theresa@gmail.com. [Learn why this is important](#)

The updated EAW is not sufficient or complete to address the environmental impacts of the University of St. Thomas arena. There are endless examples of this so I will address a limited number:

- The removal of almost 200 trees for buildings, microgrid and parking affects the important Bird Area and the Mississippi River Corridor Critical Area. Replanting trees in other areas does not mitigate this problem.
- EAW does not even mention Summit Avenue or the Mississippi River Boulevard and the effects that the UST development will have on them. This traffic onto Summit Avenue will clash with the bicycle lane on Summit Avenue which is planned to become a regional trail.
- The problems with so much street parking in residential neighborhoods, since UST is not providing adequate campus parking, and increased traffic on narrow residential streets has not been adequately addressed. The EAW does not address how often the arena will be used for events other than basketball and hockey games and resulting effects on parking and traffic. It appears that UST will use the arena as a money maker by hosting non university events, at the expense of the neighborhood. Non Student attendance at games has not been addressed.
- There is no consideration of traffic that can be expected to increase on Cretin Avenue, a major access street for I 94, as the huge Highland Bridge area is built out with many thousands of new residents, customers and employees.
- The expected increase in undergraduate enrollment of 1000 students has not been included in the EAW. There is no indication that dorm space will increase so it has to be assumed that the increased students will commute and therefore add to the traffic and lack of parking.

Please consider these and other issues which should be addressed. Furthermore, as a law abiding citizen, I am shocked that the UST feels that it is above the law by continuing its building of the arena, ignoring a court judgment.

Sincerely,

Theresa L. Walls, a concerned neighbor
2024 Fairmount Ave.

From: [janet.wilebski](#)
To: [*CI-StPaul_StThomasArena_EAW](#)
Subject: University of St. Thomas
Date: Thursday, November 7, 2024 3:56:52 PM

You don't often get email from janet.wilebski@gmail.com. [Learn why this is important](#)

City Council members,

Some months ago, we wrote to the City about our very serious concerns about the UST proposed arena. Obviously, UST has received a go-ahead to build as the structure is in a very advanced stage of completion.

Nonetheless, a full Environmental Impact Statement is needed from UST. The court invalidated their first submission and the second one is full of omissions and lack of a complete assessment.

The surrounding neighborhoods are residential with families/children. The Mississippi River area is directly impacted by the construction and ultimate use of the arena.

As long time residents of the area and constituents, we request that the Council insist on a full and adequate EIS from UST.

Alan and Janet Wilebski

PUBLIC COMMENTS

Jerome Abrams

Comment	Response
<p>12 - Water Resources</p> <p>With respect to water resources, emission of radon gas is a health risk that arises from construction of the University of St. Thomas (UST) multipurpose arena. Radium (Ra) concentrations in groundwater have been highly correlated with sodium chloride concentrations in saline aquifers (Sturchio,NC et al. ,Applied Geochemistry 16:109(2001); Vinson, A.S. et al., Chemical Geology 260:159(2009)) as a result of increased competition for adsorption sites from increased concentration of Na+ ions (Krishnaswami,S. et al., Water Resources Res,18:1663(1982); Sanders, L.M. et al., Water Air and Soil Pollution, 224:1742 (2013); Tamamura, S. et al. J of Radioanalytical and Nuclear Chem, 299:569(2014)). Langmuir and Riese noted that Ra solubility can be increased by the formation of radon-chloride complexes in saline waters (Langmuir, D. and Riese, A.C., Geochimica et Cosmochimica Acta, 49:1593(1985). The experimentally observed correlation between Ra and salt in aquifers led to the hypothesis that deicing could produce increased radium and radon concentrations. This hypothesis was tested by McNaboe and colleagues, who studied groundwater data from a monitoring well field installed around a pavement covered parking lot at the University of Connecticut, Storrs campus. (McNaboe L.A. et al., Water Air Soil Pollution 228:94(2017). The study site included an asphalt parking lot of 0.21 acres (860 square meters). Water table depth ranged from 3.3 ft (1 m) to 9.8 ft (3 m). Six monitoring wells were studied. The highest Na+ concentrations measured were found directly downgradient from the parking lot, a finding that confirmed that high levels of salt reach the groundwater. The study also noted that the salt traveled down gradient with the groundwater flow. Schubert and colleagues reported that Rn will more readily partition to the gas phase under warmer and increasingly saline conditions (Schubert ,M.et al., Environmental Science and Technology 46:3905(2012). In the paragraph devoted to the heat island effect, the EAW states, "Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council's Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat." The</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA. • Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area. • To the extent radon gas release from bedrock and soil occurs, it is generally considered a hazard only where it cannot be dissipated into surrounding air (i.e., in indoor spaces without sufficient ventilation).

Comment	Response
<p>urban heat island effect can amplify the production of radon. With shallow groundwater and increased transition to the gas phase for radon from increased salinity, an increase in flux of Rn to overlying buildings could occur (Krewski, D. et al., Epidemiology 16:1037(2005). The authors concluded that deicing salt contamination of groundwater can serve to mobilize Ra and Rn in the subsurface. The results would be applicable to any salted location where there is a high infiltration rate to groundwater, such as an urban riparian floodplain (Ledford S.H. et al., Environmental Science and Technology, 50:4979 (2016))</p>	

Comment	Response
<p>Increased radon efflux is a public health concern: Rn exposure has been identified as the second leading cause of lung cancer in the USA (Darby M.E. et al., Groundwater, doi:10.1111/gwat.12454 , 2001).</p> <p>UST reports the impermeable surface to be 5.8 acres (23472 square meters) and a ground water depth of 6ft to 12 feet (1.8 to 3.7 meters). The surface area is approximately 28 times the area in the McNaboe study, and the groundwater depth is comparable. The increased surface area would require amounts of deicing well above that in the McNaboe study, which would likely increase saline concentration in the groundwater. Efflux of radon gas would then be increased.</p> <p>Radon gas is currently found in Ramsey County. Data for Ramsey County obtained by the Minnesota Department of Health found that 65.6% of properties tested from 2010-2020 had radon concentrations of equal to or greater than 2 pCi/L and 29.4% had concentrations equal to or greater than 4 pCi/L. The EPA states that there is no known safe level of radon exposure and recommends mitigation for radon levels between 2 pCi/L and 4 pCi/L. The EAW does not analyze groundwater composition, groundwater contamination, or groundwater and subsurface radium or radon concentrations. The EAW plan for reducing risk from salting is vaguely described as a multi step process. Specific mitigations are once again absent from the EAW. No analysis of health risk is provided.</p> <p>The health hazard of radon gas liberated by the UST multi use arena to the surrounding neighborhood residents must be addressed and mitigated.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA. • Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area. • To the extent radon gas release from bedrock and soil occurs, it is generally considered a hazard only where it cannot be dissipated into surrounding air (i.e., in indoor spaces without sufficient ventilation).
<p>17 - Air</p> <p>The EAW states, “The Microgrid Project is proposed to further expand the University’s microgrid testing and research capabilities that exist on campus and will include mechanical equipment such as three 500 kW generators ...” On page 9, the EAW states, “The use of the Microgrid Project does not have any direct relationship to the use of the Arena.” It then contradicts itself on page 13 and states that “the project is being considered for connection to the campus microgrid for back-up power during outages or emergency events.” Frequently, diesel fuel is used to power generators. The use of diesel generators can cause pollution from GHG emissions and from ultrafine particle emissions.</p>	<p>Thank you for your comment. The Arena project includes a generator for backup/emergency power, which is a requirement to meet life safety code requirements, so the use is expected to be extremely limited. Backup power usage is unknown (and hopefully never utilized) as it requires the primary power to be out of service, which is not predictable. Therefore, the backup generators were not included as a source of GHG emissions.</p>

Comment	Response
<p>Facilities Engineering Associates (FEA) analyzed a typical diesel generator system with the following characteristics:</p> <ul style="list-style-type: none"> • Facility load = 2 Megawatts • Generator Redundancy = 2N • Generator Unit Rating = 2 Megawatts • Number of Generators Running = 2 Generators • Generator Running Capacity = 4 Megawatts • Generator Load Factor = 50% (each 2MW Generator will carry 1 Megawatt of load) • Annual Generator Runtime = 100 hours (EPA limit for testing and maintenance) • Annual Generator Energy Production = 200 Megawatt-Hours <p>With the generator load factor (50%) and the annual generator runtime (100 hours) a typical engine fuel consumption rate of 78 Gallons/Hour at 50% load, annual fuel consumption is approximately 15,600 Gallons / Year</p> <p>The EPA/Department of Transportation (Federal Register 2010) uses the conversion factor 10.180×10^{-3} Metric Tons of CO₂ / Gallon of Diesel Fuel to convert gallons of diesel fuel to metric tons of CO₂. The annual CO₂ emissions from these typical generators would then be 159 Metric Tons of CO₂/Year.</p> <p>The EAW contains no description of the type of generator. It does not specify the facility load, the run time hours, or the fuel consumption. The environmental and health consequences from the emissions of both carbon dioxide and particulate matter produced by the generators used to provide refrigeration for maintaining the ice surface are absent from the EAW. Using the information for typical diesel generators, and using the EAW description of three 500 kW generators, 131.2 US tons of carbon dioxide would be emitted per year for 100 hours of run time. 100 hours represents approximately 1% of a year. The EAW does not specify the type of generators or their expected use over the duration of the project. The EAW must include include generator load factor, and annual generator runtime.</p>	<p>Thank you for your comment. The Arena project includes a generator for backup/emergency power, which is a requirement to meet life safety code requirements, so the use is expected to be extremely limited. Backup power usage is unknown (and hopefully never utilized) as it requires the primary power to be out of service, which is not predictable. Therefore, the backup generators were not included as a source of GHG emissions.</p>

Comment	Response
<p>A further significant health risk from diesel engines is the emission of PM 2.5 particles, fine particles with an aerodynamic diameter less than 2.5 microns. Epidemiological studies show that asthma, lung dysfunction, lung cancer, and other related diseases are positively correlated with increased particulate matter exposure. (Yen-Yi Lee, et al. Aerosol and Air Quality Research 17:2424a(2017). WHO guidelines indicate that concentrations greater than 25 micrograms/cubic meter are hazardous.</p> <p>In the study of Zikang and colleagues (Zikang,F et. al, Atmosphere13:1766(2022,) PM2.5 emissions from two different diesel generators were tested. Note that the diesel generator exhaust was emitted to the surrounding air. PM2.5 concentrations were measured at 220 µg/m3 at startup and stabilized to 170µg/m3 as the generator continued running, values significantly higher than WHO recommendations.</p> <p>Diesel powered public transportation vehicles are important emission sources of particulate and gaseous components of PM2.5. These toxic compounds include polyaromatic hydrocarbons, nitro-compounds (Allen et al., 1996; da Rocha et al., 2009; Bakeas et al., 2011; Cheruiyot et al., 2015), water soluble ions, metal elements, carbonyl-compound , and organic/elemental carbon. Idling diesel powered buses and trucks can increase air pollutant concentrations in vicinity of these vehicles. The presence of school buses was positively correlated with an increase in the total particle number concentration during drop-off/pick-up hours. In addition, the number of idling buses and trucks was positively associated with black carbon levels on the street canyon near a cluster of schools (Zhang et al (Atmos Environ,2013,69:65) The use of diesel buses, frequently seen idling while waiting for passengers especially in winter, presents a health risk that is due to PM 2.5 emissions. Diesel buses transporting visiting teams to UST have already been observed to idle on Goodrich Avenue. The EAW has no definite plan for managing the diesel powered buses or diesel powered trucks. The UST arena is surrounded by residential neighborhoods and is the home of many elderly individuals with associated chronic lung diseases. The use of diesel generators and buses places these individuals at increased risk for significant health complications. Mitigation of the health risk from ultrafine particles must be addressed.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The generators for each project discussed in the 2024 EAW Update are for backup/emergency power, which is a requirement to meet life safety code requirements, so the use is expected to be extremely limited. Each generator is noted within the 2024 EAW Update with how much fuel is stored within a connected tank. The generators installed for the Microgrid Project will be used for research. The frequency of operation will vary based on research needs. • St. Thomas provides a Visitor’s Guide to all visiting athletic teams. The Visitor’s Guide provides directions for where the visiting team must be dropped off and where the visiting team bus must park on campus during the event. Whether to use that bus parking location or travel off campus to eat/rest is at the discretion of the visiting team bus driver. However, providing a location for the bus to park on campus and a location within a UST building for the driver to wait during an event will help prevent an idling bus from parking illegally in the neighborhood and lower vehicle emissions.
<p>18 - Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	

Comment	Response
<p>The National Hockey League (NHL) reported that a single game in a typical NHL arena, such as the Xcel Energy Center, produces 408 tons of carbon dioxide. The proposed UST arena is approximately 40% the area of the Excel Energy Center. Per game, the UST arena can be estimated to release 163 tons of carbon dioxide. Assuming that a game lasts approximately 4 hours and that the ice sheet would be maintained for at least 24 hours, the carbon dioxide emissions would be 978 tons for each game day. The UST 2024 -2025 schedule for men’s hockey, women’s hockey, men’s basketball, and women’s basketball lists 58 home games. Assuming the 58 games listed in the 2024-2025 are representative of future games, carbon dioxide emissions would be 56724 tons for the home sports schedule. The home sports schedule extends from October 1,2024 through March 1, 2025 or 152 days. Assuming the ice sheets are maintained for the entire hockey season, the carbon dioxide emissions would be 148656 tons. If the ice sheets are maintained for the entire year for, for example, full year hockey practice and for summer hockey camps, carbon dioxide emissions would be 356970 tons.</p> <p>This number does not include the additional emissions from the practice schedule, games played by teams other than UST teams, and other events, such as concerts. This number is greater than the 2515 tons carbon dioxide/year reported on page 50 for combustion and grid base equipment. Another method of calculating carbon dioxide emissions uses the energy consumption of the arena in MWh. The International Ice Hockey Federation Guide to Sustainable Arenas states the average energy consumption for an average size hockey arena is 3000 MWh per day. Then, for an average arena with average energy consumption, and using the EPA conversion factor of 0.417 metric tons of carbon dioxide/MWh, the daily production of carbon dioxide is given by: $(3000\text{MWh}/\text{day})(0.417 \text{ metric tons}/\text{MWh}) = 1251 \text{ metric tons}/\text{day}$ For one year, the carbon dioxide emissions would be $(1251)(365) = 456,615 \text{ metric tons}/\text{year}$ For short tons, the amount would be $(1.012 \text{ short tons}/\text{metric ton})(456615 \text{ metric tons}/\text{year}) = 462094 \text{ short tons}/\text{year}$. The EAW reports that 929 tons carbon dioxide/year of a total of 2515 tons carbon dioxide per year would be produced by combustion. Using these values, combustion accounts for 37% of carbon dioxide emissions or $(0.37)(462094) = 170974 \text{ short tons carbon dioxide}/\text{year}$. If the arena uses 1000 MWh/day, carbon dioxide emissions would be 56421 short tons/year. This value is greater than the reported value of 929 tons/year. Again, the 2024 – 2025 men’s hockey, women’s hockey, men’s basketball, and women’s basketball season extends from October 1, 2024 through March 1, 2024.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The operational emissions of the facilities were estimated using the US Environmental Protection Agency’s Simplified GHG Emissions Calculator (SGEC) (August 2022 version). This tool is recommended by the EQB in the 2024 EAW Climate Guidance document to provide a best estimate of average annual emissions for the project. Assumptions utilized into the SGEC tool for the GHG analysis follow guidance and data from EPA and the U.S. Energy Information Administration. Only operational vehicle emissions are included in the SGEC tool. The GHG Vehicle Emissions Analysis using the University of New Hampshire methodology as noted in the 2024 EAW was completed to document the change in vehicle emissions for spectator travel to the new Arena per the Court of Appeals Opinion. Nitrous oxide (N₂O) is a type of greenhouse gas that is listed in the EQB’s 2024 EAW Climate Guidance document. Tables 10, 11, and 12 provide emissions in metric tons of CO₂ equivalent (CO₂e), which is the standard unit for comparing the degree of potential climate impact caused by emissions of different GHGs. GHG emissions are converted to CO₂e by multiplying nominal estimated emissions of each gas by its global warming potential. This calculation is completed in the US EPA’s SGEC tool. The SGEC information included in Appendix B of the 2024 EAW Update document includes emissions for Nitrous Oxide and Hydrocarbons.

Comment	Response
<p>Presumably the ice sheets would be maintained for the 152 days of the sports schedule. Then for energy consumption of 3000 MWh/day, carbon dioxide emissions would be 190152 short tons, and for 1000 MWh/ day, the carbon dioxide emissions would be 62750 short tons of carbon dioxide emissions. Both numbers are greater than 929 short tons of carbon dioxide emissions per year. The EAW statement that proposed operational emissions from combustion (arena and microgrid) stationary equipment are 929 tons/year is significantly less than the amount calculated above. Although the EAW states that the EPA Greenhouse Gas Calculator was used, the assumptions made and the data employed are not specified. In addition, the generators that will produce this energy, the load, number of generators, load factor, annual runtime, and annual generator production are not specified.</p> <p>Appropriate analysis must specify the energy requirements of the arena, the duration of the need for this amount of energy, and the specific type of stationary generators that will produce this amount of energy.</p> <p>Another source of air pollution is the production of nitric oxide by vehicles traveling to and from the arena events. The EAW indicates that 1498 pre-event trips would occur and that 1581 post event trips would occur. These estimates make an unverified assumption of 2.7 passengers per vehicle. The discrepancy of 83 vehicle trips between pre and post events is not explained. The distance from, for example, from I94 to UST at Grand Avenue is approximately 1 mile. The total of 2583 pre and post event vehicle trips results in 2583 vehicle miles traveled. The EAW notes that, " vehicle GHG emissions are not reviewed or analyzed for an EAW." Modern vehicles produce approximately 0.06 gm of NOx per km mile travelled, or 0.037 gm per mile. This estimate excludes the miles traveled by automobiles, buses, and other vehicles in the search of parking and NOx produced by idling cars and buses. A meta-analysis by Ghassan and colleagues identified "consistent evidence of a relationship between NO2, as a proxy for traffic-sourced air pollution exposure, with lung cancer."(Ghassan BH et al.,Lung Cancer and Exposure to Nitrogen Dioxide and Traffic: A Systematic Review and Meta-Analysis, Environ Health Perspect,123: 1107(2015)). For the EPA, the National Ambient Air Quality Standard(NAAQS) is : NO2 100ppb for 1 hour.</p> <p>Section 18a of the EAW states," This section includes an estimated quantification of the following GHG emissions associated with the proposed project:</p> <ul style="list-style-type: none"> • Carbon Dioxide (CO2) •[sic] Nitrous Oxide (N2O) • Methane (CH4)." <p>Please note that nitrous oxide is commonly referred to as laughing gas and is</p>	

Comment	Response
<p>not the pollutant of interest. The EAW then fails to analyze NOx pollution from vehicles in Tables 10, 11, or 12 or in Appendix C. The EAW is inconsistent and fails to analyze an important health care risk.</p>	

20 - Transportation

<p>Environmental and safety risks from traffic congestion and parking are inadequately analyzed and mitigated in the revised EAW. The EAW tabulated existing conditions at several intersections. The delay times were reported for non-event conditions. The analysis failed to include the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue. These intersections are in the area bordered by Goodrich Avenue, St. Clair Avenue, Mississippi River Boulevard, and Cretin Avenue, a neighborhood of residential homes. These streets are close to the arena site and are already used for UST soccer game parking. The EAW notes that for the Cretin Avenue/ Marshall Avenue intersection, more distant from the arena and during non arena events, “the southbound and eastbound approaches were observed to have 95th percentile queues of 650 feet during the p.m. peak hour. In addition, the westbound approach was observed to have queues of 450 feet or greater during the p.m. peak hour.” The EAW also stated that, for the Summit Avenue at Cretin Ave and Cleveland Ave, “Due[sic] to the median width and signal limitations, there is limited storage/capability for side-street left-turn movements to enter the intersections. Of note, the westbound left-turn movement at the Summit Avenue/Cretin Avenue intersection operates at LOS F ... with 95th percentile queues of approximately 150 feet during the p.m. peak hour.” LOS F is the condition of exceeding the capacity of the roadway. The EAW noted a delay of 77 seconds with the LOS F conditions but failed to measure the duration of the queues caused by the delay. Again, the delay times were reported for non event conditions. A failure</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. • The project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. The project site is located in SPPD Fire District One, with the nearest stations being Station 14 (Snelling Avenue near Marshall), Station 20 (Vandalia and University), and Station 19 in (Edgecumbe Road). All stations house EMT teams in addition to fire apparatus. This is in addition to ambulance services associated with hospitals/health care systems in Saint Paul. The proposed site is located in the Western Patrol District of SPPD. All first responders generally use major routes to reach a service/call site and have signal priority where needed. • Project mitigation measures include provisions for traffic management during event periods, and will include monitoring of traffic and identification issues needing to be addressed.
---	--

Comment	Response
<p>to consider the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue ignores an important safety issue. Fairmount Avenue, Princeton Avenue, and Sargent Avenue are close to the arena and would be used for the on street parking that the EAW reports as useable parking spaces for arena events. The serious consequence of this delay is blocked access to the neighborhood by first responders and associated emergency vehicles. This blocked access to the neighborhood is a serious safety risk and is analyzed in detail in the following discussion.</p>	
<p>Delayed access for first responders and emergency vehicles is a consequence of the number of cars needing parking, two-sided parking, and narrowing of the streets with winter snowfall. The number of cars that will need parking accommodation can saturate the space available on adjacent neighborhood streets. In addition, cars leaving the neighborhood will experience delay, because the cars must merge with traffic flow on Cretin Avenue and will require both right and left turns to merge. The resulting delay from the queued cars waiting to exit was calculated at 41 minutes. (Please see EAW Comment Appendix). With two-sided parking in winter, and for one way traffic flow, a driving lane width of only 8.5 ft or less is available for emergency vehicle access. Fire trucks and first responder ambulances are 9-10 ft wide and require a lane wider than 10 ft when in motion. MN state fire code chapter 5 definition of a fire access road includes streets. A 20 ft minimum width for homes without sprinkler protection is required by Minnesota state fire code. The vast majority of homes in the adjacent neighborhoods are not sprinkler protected. With two-way traffic, and cars queued to exit in both directions, no</p>	<p>Thank you for your comment. Emergency vehicle service to the Arena is accommodated internal to UST's South Campus parcel, as reviewed during the City's Site Plan Review process, and the project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. City snow management policy calls for plowing to the curblin, and allows for the imposition of one-sided parking bans where snow accumulations across a season begin to impinge on roadways.</p>

Comment	Response
adequate access lane will exist for fire trucks will be available, and the lane will be too narrow for ambulances.	

Comment	Response
<p>Why will this situation occur? The UST plan states ,” the other nonresident parking lots and on-street parking (no permits required) were expected to accommodate the displaced vehicles .”The 2024 EAW then contradicts itself and states,” Since on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum, the review was focused on the visitor parking facilities”, and on page 14 of appendix D, lists 369 adjacent on street parking spaces as available and are included in the analysis. The closest on campus parking facility to the arena is the Anderson parking ramp, which can accommodate approximately 750 vehicles. While a UST spokesperson stated in the EQ Monitor that events having 5500 attendees will occur 35 times a year, Table 14, page 57 of the EAW tabulates a total of only 2 games at or near arena capacity. Table 5 page 16 appendix D indicates that only 2 games will be at maximum arena capacity, while on page 12, the EAW contradicts itself and states that 6 -9 maximum attendance games are anticipated. Why is an estimate of attendance for concerts, conferences, and other events not included? Clearly, the estimated attendance for the sporting events is arbitrary, the attendance for other arena events is absent, and attendance numbers are underestimated. A responsible assessment would plan for maximum attendance. For an event of 5500 attendees, the UST estimate of 22% of attendees arriving by non-private motor vehicle, and 2.7 passengers per private vehicle, 1588 cars will require parking accommodation. In the absence of a law requiring 2.7 passengers per vehicle, the number of passengers per car is likely to be less. During the women’s soccer game on 8/25/2024, 33 cars were parked on Woodlawn Avenue from Goodrich Avenue to Princeton Avenue when on campus parking was available. Observation demonstrated that only 1 or 2 passengers occupied the vehicles. For the FHA value of 1.7 passengers per vehicle, 2523 cars will need parking. The EAW identifies 1084 on campus parking spaces. Many of these planned parking spaces are distant from the arena site. Even assuming attendees will park in these facilities and walk in the cold of winter, 504 to 1439 cars will need parking accommodation off campus. The EAW makes the incomprehensible statement that” “it is generally good practice for the parking supply of a visitor parking facility to equal the peak parking demand plus an additional five (5) to 15 percent. This extra supply reduces the unnecessary circulation of vehicles looking for parking and the perception of inadequate parking.” While this statement holds true during daily non-event conditions, it does not apply to event conditions”. This statement is not a technical clarification. It demonstrates lack of accountability and responsibility. Why can UST arbitrarily</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • To clarify, the only on-street parking spaces included in the event parking supply are the 369 spaces on streets immediately adjacent to the UST campus and do not require a city permit. These spaces are illustrated with purple lines on Figure 1 within the 2024 EAW Update Transportation Analysis Addendum. • The comparison of the parking supply in visitor lots (UST collects data annually in the fall and spring), which is documented on page 3 of the 2024 EAW Update Transportation Analysis Addendum, was intended to validate with technical guidance that the opening of the Schoenecker Center would not impact event parking/operations at the proposed Arena. Results of the comparison indicated that there is more available parking during weeknight event times than before the Schoenecker Center opening. • The event parking analysis, which is found on Page 14 of the 2024 EAW Update Transportation Analysis Addendum, is generally consistent with what was published within the 2023 EAW Transportation Analysis. Note the only update was a correction of an error in the table. • While Table 2 on Page 12 of the 2024 EAW Update Transportation Analysis Addendum shows 6-9 maximum capacity hockey games, the text indicates "For the purposes of this addendum and the event parking demand analysis, all men's hockey games are assumed to be maximum capacity events to take a conservative approach." • The two tables mentioned are the same table. Note the seating capacity for basketball events is 5,500, whereas the seating capacity for hockey events is 4,000. Therefore, the maximum capacity hockey events (i.e. 18 games) are being captured in the 4,499 - 3,500 attendance range, whereas the maximum capacity basketball events (i.e. 2 games) are being captured in the 5,500 - 4,500 attendance range. • Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.

Comment	Response
suspend good management practices and substitute practices that jeopardize health and safety of neighboring residents?	<ul style="list-style-type: none">As mentioned on Page 7 of the 2024 EAW Update Transportation Analysis Addendum, "during event conditions, common practice involves implementing strategies to fully utilize parking supply." Page 7 also identifies two strategies that are planned and/or recommended to help reduce the circulation of vehicles in the project area.

Comment	Response
<p>Where will the cars park? People will choose to park as close to the arena as possible, even if more distant off-street parking is available. This assumption is reasonable, given that hockey and basketball are primarily winter sports, and arena attendees will likely choose to walk no further than necessary in the cold and snow. The UST website states that no free parking is available on campus. Free city street parking will likely be preferred. Evidence for this argument already exists. UST students and staff park on the north side of Goodrich Avenue, a street adjacent to the UST campus, even though more distant on campus parking is available. Again, the women’s soccer game on 8/25/2024 with many fewer attendees than would be attending an arena event provides further evidence. During the soccer game, 33 cars were parked on Woodlawn Avenue from Goodrich Avenue to Princeton Avenue. Observation identified only 1 or 2 passengers per vehicle. On the north side of Goodrich Avenue 51 cars were parked. On the south side of Goodrich Avenue, a restricted parking zone requiring a permit at all times, five cars were illegally parked. Sufficient on campus parking was available, but free on street parking apparently was preferred. When school is in session, the north side of Goodrich Avenue has average of 56 cars from Mississippi River Boulevard to Cretin Avenue. This number of parked cars saturates the street on a daily basis when school is in session.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • UST's website is referring to normal daily operations, however, as mentioned on Page 17 of the 2024 EAW Update Transportation Analysis Addendum "Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no cost to event patrons. However, parking pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan." • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.
<p>What streets will be used? For further analysis, consider the neighborhood bordered by Goodrich Avenue, Princeton Avenue, Mississippi River Boulevard, and Cretin Avenue. It is adjacent to the south campus and is one of the neighborhoods that will be used for free on street parking. Making the reasonable assumption that cars will park at the same density as UST students and staff parking on the north side of Goodrich Avenue, we used this average number of cars divided by the length of the street from Mississippi River Boulevard to Cretin Avenue to calculate the number of cars that can be accommodated in this neighborhood. Over 300 cars can park on these streets. Clearly, 505 to 1439 cars are enough to saturate this neighborhood.</p>	<p>Thank you for your comment. As noted, the only on-street parking spaces included in the event parking supply are the 369 spaces on streets immediately adjacent to the UST campus and do not require a city permit. These spaces are illustrated with purple lines on Figure 1 within the 2024 EAW Update Transportation Analysis Addendum.</p>
<p>Why is the saturation of the adjacent neighborhood a safety problem? Access of emergency vehicles will be blocked. This conclusion was reached by measuring the width of the streets with two-sided parking on 3/26/2024 following a snowfall. A typical width of a parked car is 5 feet. The street width measurement did not include the width of parked pick-up trucks. For example, a Ford F-150, excluding extended side mirrors, has width of 6 feet 6 inches. With two-sided parking and one way traffic, the street width was measured at 8 feet 5 inches. First responder emergency vehicles are 9 -10 ft wide and</p>	<p>Thank you for your comment. Emergency vehicle service to the Arena is accommodated internal to UST’s South Campus parcel, as reviewed during the City’s Site Plan Review process, and the project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. The project site is located in SPPD Fire District One, with the nearest stations being Station 14 (Snelling Avenue near Marshall), Station 20 (Vandalia and University), and Station 19 in (Edgecumbe Road). All stations house EMT teams in addition to fire</p>

Comment	Response
require a lane wider than 10 ft when in motion. MN fire code requires access road width of 20 ft for non sprinkler protected homes.	apparatus. This is in addition to ambulance services associated with hospitals/health care systems in Saint Paul. The proposed site is located in the Western Patrol District of SPPD. All first responders generally use major routes to reach a service/call site and have signal priority where needed.

Comment	Response
<p>How long will the clogged streets persist?</p> <p>As noted above, The EAW tabulated existing conditions at several intersections. The delay times were reported for non event conditions. The analysis failed to include the intersections of Fairmount Avenue and Cretin Avenue, Princeton Avenue and Cretin Avenue, Sargent Avenue and Cretin Avenue, and St. Clair Avenue and Cretin Avenue. As At LOS F, the volume of cars exceeds capacity of the street. LOS F was identified at peak hour traffic under non event conditions, and a 77 second delay was measured in the limited analysis. The EAW 2023 states that, with events, “multiple unsignalized side street approaches on Cretin Avenue will be difficult to make left turn movements for 15 to 30 minutes”. Although this statement does not appear in the revised EAW, the same conditions exist. To analyze the consequences of this recognized delay further, consider, as an example, Fairmount Avenue, from Woodlawn Avenue to Cretin Avenue. This section of Fairmount Avenue is merely one block from the south campus and is a likely choice for parking. With two-sided parking, 84 cars can be accommodated in this portion of Fairmount Avenue. Cretin Avenue is the likely choice of exit from this street. Exiting on Cretin Avenue requires both right and left turns. Exit time to Cretin Avenue from Fairmount Avenue was measured at 2-minute intervals from 4:36 PM to 5:30 PM on 4/9/2024 without a special event in progress. Average delay for cars to enter the traffic flow on Cretin Avenue was 41.4 seconds. Exit time for cars that queue at the exit to Cretin Avenue was modeled using the method of Mao et. al. (Mao, X et al., Optimal Evacuation Strategy for Parking Lots Considering the Dynamic Background Traffic Flows, Intl J Environ Res and Public Health, 2019,16:2194) Their model assumes no left turn, no non-motorized or pedestrian traffic, and exit of only one car at a time. Their published numerical simulation for two exits onto a street with background traffic flow that reasonably approximates the conditions of Fairmount Avenue exiting to Cretin Avenue demonstrated delays of 17 minutes and 28 minutes, respectively. Using their model, and again assuming one way traffic and no non-motorized traffic, queue clearing time from Fairmount Avenue to Cretin Avenue was calculated at 41 minutes. During this interval, a lane of only 8.5 ft width will be available for emergency vehicles, if traffic is only one way. During the winter snow season, residential streets with 2-sided parking, two way traffic, and cars queued to exit in both directions, will be clogged. No driving lane will be available for emergency vehicles. With two-way traffic and thousands of pedestrians converging on the neighborhood with an arena event, the delay time is likely to be increased. The EAW 2023 mitigation is, “Communication should be made to area residents and other sources of commuter traffic so</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Emergency vehicle service to the Arena is accommodated internal to UST’s South Campus parcel, as reviewed during the City’s Site Plan Review process, and the project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. • A 1/2-mile is generally considered walking distance for the general public. The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods, and included intersections up to one-mile from the arena, such as the Cretin Avenue/I-94 Ramp intersection. • As noted on Page 29 of the 2023 EAW Transportation Study, future Highland Bridge Traffic was accounted for. As stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development."

Comment	Response
<p>they are aware of potential traffic ...". This thoughtless statement would require neighborhood residents to schedule heart attacks, strokes, or other emergencies around the basketball and hockey schedule. This recommendation continues in the vague and arbitrary mitigation procedures noted by the court of appeals and does not responsibly address mitigation. UST Multipurpose Arena EAW Transportation Analysis September 23, 2024 2024 EAW Transportation Analysis Update Addendum , figure 5 and 6 state that , "With mitigation, congestion/ queuing is expected to occur for 20 to 30 minutes prior to the event" and that, "With mitigation it is expected to take approximately 20 to 35 min to clear the Anderson Parking Facility (APF). The study area is expected to be cleared shortly after the APF". This amount of delay places residents of the adjacent neighborhoods at risk. American Heart Association guidelines state that for, heart attack, door to treatment time goal is less than 30 minutes. For stroke, door to treatment time goal is less than 60 minutes. These guidelines will be impossible to meet under these conditions. Delay causes irreversible loss of heart tissue, irreversible loss of brain tissue, and increased risk of death. The obstruction of emergency vehicle access to the neighborhood as a result of the arena events risks the lives, health, and safety of neighborhood residents. Please note that the Environmental Assessment Worksheet (EAW) identified 1 death and 3 serious crashes without an arena event. The EAW specifies that adjacent on street parking will be used. Adjacent neighborhood streets are considered to be a UST parking lot, although these streets do not have the capacity for the parking demand and will not allow emergency vehicle access during arena events. Even shopping malls have emergency vehicle access.</p> <p>The residents of St. Paul can reasonably demand that the City of St. Paul government protect the lives, health, and safety of its residents. The traffic analysis in the EAW fails to address the safety consequences of the increased traffic and congestion. A project that generates 250 or more trips at peak hours or 2500 or more daily trips are criteria of the Minnesota Department of Transportation for implementation of a Traffic Impact Study. The current EAW states that 2853 trips are expected to occur at arena events. In the section of Cumulative Potential Effects, the EAW arbitrarily defines the " geographic areas considered for cumulative potential effects are those near the project site (within approximately one-half mile)". What law limits the cumulative effects distance to one half mile? The Highland Bridge development will increase traffic on Cretin Avenue and is a mere 1.4 miles from UST. The EAW fails to consider the Highland Bridge project. The current traffic analysis in the EAW is inadequate. A responsible Traffic Impact Study is necessary.</p>	

Comment	Response
<p>Recommended parking mitigation</p> <p>The revised EAW proposes parking mitigation procedures. These proposals include:</p> <ol style="list-style-type: none"> 1. Provide Communication on Alternative Transportation Options with Online Ticket Sales. Comment: Use of alternative transportation is voluntary and not enforceable. 2. Implement Pre-paid Online Event Parking Assignment Assigned Parking . Comment: Purchase of pre paid parking is voluntary and not enforceable. 3. Resident Parking Permits to Increase Visitor Parking (Morrison L2). Comment: This recommendation needs further definition. 4. Continue Use of Pre-paid Online Event Tickets. Comment: Pre paid online event parking tickets are voluntary and not enforceable. 5. Clear Parking Ramps (APF, ASC, McNeely, Frey, Morrison L2) Prior to Game. Comment: Where do these cars that are displaced from these parking facilities go when the ramps are cleared? 6. Provide Advanced Notice, Online Classes, and other Strategies with Parking Ramp Clearing. Comment: How will this information be provided and enforced? 7. Free Transit Pass Option with Purchase of Ticket. Comment: Use of public transit is voluntary and not enforceable. 8. Discounted Rideshare Reduces Parking Demand. Comment: How will this strategy be implemented? 9. Restaurant/Bar Shuttle Services. Comment: What restaurants are considered and how will this strategy be implemented? 10. Other events on campus will not be scheduled. Comment: How will this strategy be enforced? 11 .Provide Off-Site Parking and Shuttle Services. Comment: Use of shuttle service will be voluntary and not enforceable. 12. Traffic Control Officers along Cretin Avenue Traffic/Pedestrian Operations & Safety Event Signal Timing Plans at Strategic Intersections. Comment: Will the tax payers of St. Paul be responsible for subsidizing the payment to traffic control officers and upgrading traffic signals? <p>As noted in the court of appeals decision, caselaw ... recognized as mitigation measures [sic] include an enforcement mechanism. The enforcement mechanism for the proposed mitigation measures are absent.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, St. Thomas will reduce the number of student resident parking permits within Morrison L2 which will increase the supply of commuter/staff parking spots that can be used for Arena events. • As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, St. Thomas will pair the time-of-day restrictions with early communication and clear notification to its internal staff, faculty, and commuting students prior to enforcing the event parking restrictions. This system is currently used for large events. St. Thomas will proactively work with faculty and the registrar to schedule online classes as necessary to reduce the number of vehicles coming to campus, to ensure the ramp clearing strategy is effective. Student residents with full time parking permits will not be displaced to avoid spillover to the neighborhood. • As mentioned on Page 19 of the 2024 EAW Update Transportation Analysis Addendum, preliminary discussions with two rideshare companies (Uber and Lyft) indicate that discounted rates can be easily implemented. To clarify, these discounted rates would not be provided by the rideshare company, but rather would occur at the cost of UST. The discount pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan. Discounts can be easily implemented by providing a unique code when event patrons purchase tickets. This code can then be applied when users take a rideshare to/from a geofenced location (i.e. campus), offering a seamless way to incentivize and manage transportation options. • UST has had preliminary discussions with potential locations and several restaurants and bars are interested in partnerships. In addition, the Office of Alumni Affairs will coordinate events before games at establishments with shuttle partnerships. Specific partnerships and details on restaurant/bar shuttles are expected to be finalized and outlined as part of the EMP. • Traffic control officers and event signal timing plans will be at the cost of UST. UST will be required to adopt and implement an Event Management Plan as a condition of obtaining and maintaining a Certificate of Occupancy.

Comment	Response
<p>Calculation of delay in exit of parked cars</p> <p>The issue is the delay that will occur when the arena event concludes, the attendees attempt to leave the streets where their cars are parked, and a neighborhood resident has an emergency. Again, we use Fairmount Avenue as an example. The argument will apply to other neighborhood streets. The model employed is that used by Mao et. al. (Mao, X et al., Optimal Evacuation Strategy for Parking Lots Considering the Dynamic Background Traffic Flows, Intl J Environ Res and Public Health, 2019,16:2194) The model assumes no left turn, no non-motorized or pedestrian traffic, and one car can exit at a time. Let Q_r = the background traffic flow. Please see appendix for determination of Q_r</p> <p>τ_r = minimum time for background traffic to allow exiting vehicle to merge into background traffic. Please see appendix for determination of τ_r</p> <p>T_r = average time for two consecutive intervals for car to exit.</p> <p>μ_r = average time of arrival in queue. Please see appendix for determination of μ_r.</p> <p>$T_r = 1/(Q_r \cdot \exp(-Q_r \cdot \tau_r)) - 1/Q_r - \tau_r$. $T_r = 6.05$ minutes.</p> <p>Since the vehicle at the front of the queue can only leave and merge in to the background traffic flow when vehicle headway is greater than the minimum time for background traffic to allow vehicle to exit into background traffic flow, the average time between the intervals is the service time of queueing system. Let d_r = average queueing time per car.</p> <p>$d_r = T_r / (\mu_r \cdot T_r - 1) = 41$ minutes.</p> <p>Numerical simulation, by Mao and colleagues, of evacuation of a parking lot with two exits similar to the exits from the neighborhood streets to Cretin Avenue had average queueing times of 17 minutes and 28 minutes. The simulation assumed no left turns, background traffic flow, and no non-motorized traffic. (Mao et al, op. cit.). With left turns and two way traffic, delays in excess of 28 minutes are reasonable.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm) and is only expected to last for 20-30 minutes before and after the event. • Visitor parking ramps other than APF (i.e. ASC, McNeely, Tommie East, Tommie North) are expected to clear rather quickly. The APF is expected to take 20 to 35 minutes to clear post-event. However, it should be noted that that is the "total" ramp clearing time, and the average delay per vehicle exiting the ramp is expected to be around 10 minutes or less.

Advocates for Responsible Development (ARD) – c/o Daniel Kennedy¹

Comment	Response
<p>1. The EAW and update should not be accepted because they are inconsistent with applicable zoning restrictions.</p>	<p>The argument that the project is inconsistent with applicable zoning restrictions does not address an environmental effect.² In addition, no land use or zoning incompatibilities have been identified in the EAW.³</p>
<p>Applicable zoning regulations limit the height of new construction and do not permit newly constructed buildings to be as tall as the planned arena. Because the arena building would be taller than permitted by zoning regulations, the City cannot accept the EAW or Update.</p>	<p>The project site is currently zoned H2 Residential zoning district, as well as the RC-3 River Corridor overlay district. The H2 district allows residential uses as well as some civic and institutional uses.⁴ Colleges, universities, and seminaries are allowed in the H2 district subject to a conditional use permit, which defines campus boundaries and regulates building height and setback requirements, among other things.⁵ The University of St. Thomas (“St. Thomas”) has operated under conditional use permits for over three (3) decades, with revisions incorporated since 1990. The City issued St. Thomas’ most current conditional use permit in 2004 (the “CUP”) as the result of a litigation-based settlement agreement between St. Thomas, two neighborhood associations, as well as a local nonprofit organization. Per long-standing City interpretation, the more specific height requirements of the CUP are controlling for purposes of height regulation.⁶ The CUP specifies building height limits of seventy-five feet (75’) for the western portion of the Arena and sixty feet (60’) for the northern and eastern portions of the project site.⁷ All measurements are as defined by the City’s building height calculations.⁸ The Arena’s structure heights do not exceed the maximum height allowance as defined in the CUP using the City’s building height calculations.⁹ Other buildings analyzed in the 2024 EAW Update also do not exceed the maximum height allowance as</p>

¹ Because of the length of the Advocates for Responsible Development comment, key points are summarized in this table. The full text of ARD’s comments is included in the record in **Appendix C**, and was considered by the City.

² ARD Comment at 7.

³ 2024 EAW Update at 25 (Section 10.c.)

⁴ 2024 EAW Update at 23 (Section 10.a.iii.)

⁵ 2024 EAW Update at 23-24 (Section 10.a.iii.); St. Paul Code §§ 65.220, 66.221.

⁶ 2024 EAW Update at 25 (Section 10.b.)

⁷ 2024 EAW Update at 24 (Section 10.a.iii.)

⁸ 2024 EAW Update at 24 (Section 10.b.)

⁹ 2024 EAW Update at 25, 46 (Sections 10.b., 16)

Comment	Response
	defined in the CUP. Appropriate height requirements have been addressed in the site plan approval process.
Because no variance to the zoning ordinance has been granted, the zoning ordinance applies and requires a larger setback than planned for the arena.	As previously noted, college and university campuses located in residentially zoned areas require a conditional use permit, which regulates building setback requirements, among other things. The more specific requirements of the CUP are controlling for purposes of zoning regulation per a long-standing City interpretation. Appropriate setback requirements have been addressed in the site plan approval process.
The height and setback raise a variety of environmental concerns ranging from the proximity to the Mississippi River bluff, the effect of the arena’s shadow on wildlife that live adjacent to the arena in the part of the bluff known as the “Grotto,” and the effect of a tall building with massive plate glass windows on bird species, both local and those migrating along the Mississippi River.	<p>The project site is located within the Mississippi River Important Bird Area (“IBA”).¹⁰ According to the Department of Natural Resources (“DNR”), IBAs are voluntary and non-regulatory part of an international conservation effort to bird populations. The planned Arena will be to scale in comparison with other buildings located on St. Thomas’s South Campus. The Arena will be required to comply with applicable City lighting and bird-safe glass ordinance language. Fixture modeling and photometric analysis will be completed for all building lighting to analyze light levels for the project.¹¹</p> <p>The project site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation. However, wildlife that can be found within the project site may include songbirds and small mammals that have adapted to an urban environment.¹² The project site is not located within any regionally significant ecological areas (RSEA), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, or native plant communities.¹³ No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat.¹⁴</p>
2. The EAW and update should not be accepted because they are inconsistent with St. Thomas’ 2004 special conditional use permit.	<p>The argument that the Goodrich Avenue service drive must be removed does not address an environmental effect.¹⁵ Notwithstanding, any maintenance of or modification to the Goodrich Avenue service drive is not expected to have any environmental impacts.¹⁶</p> <p>St. Thomas may be required to close the service drive into the South Campus parcel from Goodrich Avenue, which is located south of the project site and is primarily</p>

¹⁰ 2024 EAW Update at 38 (Section 14.a.)

¹¹ 2024 EAW Update at 44.

¹² 2024 EAW Update at 39.

¹³ 2024 EAW Update at 40.

¹⁴ 2024 EAW Update at 42.

¹⁵ ARD Comment at 7-8.

¹⁶ 2024 EAW Update at 63 (Section 21.b.)

Comment	Response
	used for service deliveries and emergency access to the Binz Refectory, Grace Hall, and Brady Education Center. ¹⁷ The Goodrich Avenue service drive existed at the time of the CUP and is referenced in the conditions therein. In May 2024, a complaint was filed with the City alleging that St. Thomas violated the CUP by not closing the service drive when certain remodel work occurred in the Binz Refectory in 2022 and 2023, and the matter has been scheduled for a hearing before the City’s Planning Commission to determine next steps. ¹⁸ The Planning Commission will determine whether the drive should be closed or the CUP should be modified, and enforcement has been stayed until such determination is made. ¹⁹ Should removal of the Goodrich Avenue service drive be required, it will have minimal cumulative impacts with modifications made to anticipated service and emergency vehicle access and is not expected to have any other environmental impacts. ²⁰
<p>3. The site plan must be rejected because it includes development within the setback area from the Mississippi River bluff, which is strictly prohibited.</p>	The allegation that the project is within the setback area from the Mississippi River bluff does not address an environmental effect. ²¹ Notwithstanding, the project will comply with all city, watershed district, county, and state rules for stormwater management around the Mississippi River bluff, which will be addressed in the Stormwater Management Plan that will be reviewed by the City for compliance. ²²
<p>The MRCCA rules provide that no development (including impervious surfaces) may exist within 40 feet of the bluffline. City Code contains the same restriction. The consequences to a city if it permits a development that is prohibited by the MNRRA or MRCCA could include a finding by the federal government that the city is noncompliant and is therefore ineligible for financial assistance until it returns to compliance.</p>	The project site is located in the Mississippi Corridor Critical Area (the “MRCCA”), designated under Minnesota law to protect and preserve resources along the corridor through implementation of additional planning and development standards at the municipal level. ²³ The City is in the process of formal adoption of new ordinance language consistent with Minnesota’s Administrative Rules related to MRCCA, but has not yet completed the adoption. ²⁴ According to the Administrative Rules, the City’s existing MRCCA ordinance remains effective until new zoning standards are formally adopted by the City. ²⁵ As such, the project site lies within the RC3 River Corridor Urban Open overlay district. The City addressed

¹⁷ 2024 EAW Update at 62 (Section 21.b.)

¹⁸ 2024 EAW Update at 62-63 (Section 21.b.)

¹⁹ 2024 EAW Update at 63 (Section 21.b.)

²⁰ 2024 EAW Update at 63 (Section 21.b.)

²¹ ARD Comment at 15.

²² 2024 EAW Update at 33 (Section 12.b.ii.)

²³ 2024 EAW Update at 23 (Section 10.a.ii.)

²⁴ 2024 EAW Update at 23 (Section 10.a.ii.)

²⁵ 2024 EAW Update at 23 (Section 10.a.ii.); *Property owner information – MRCCA*, Minnesota Department of National Resources, Mississippi River Corridor Critical Area Program, https://www.dnr.state.mn.us/waters/watermgmt_section/critical_area/property-owner-information.html (last visited November 10, 2024); Minn. R. 6106.0070, subp. 2(B).

Comment	Response
	the RC3 setback requirements in the site plan approval process to ensure the project is in compliance with the applicable regulations. Note that the Arena structure is more than 40 ft from the bluff.
<p>There is just no possible way to redirect the groundwater around the arena and have it flow in a natural way toward the Grotto and the river. ... The site plan shows that St. Thomas plans extensive development above and below ground adjacent to the bluff. ... That leaves no permeable surface for rainwater to fall and soak into the ground, rather than running into a gutter and being transported elsewhere by pipe. ... There will be insufficient moisture to maintain the vegetation in the bluff area, and the death of the vegetation and its root structures will accelerate erosion during any introduction of moisture, whether it be a rainfall or a release of water from the arena. The bluff will eventually broaden, and the soil supporting the UST sidewalks and roadway may give way, pulling those hardscape structures into the river gorge.</p>	<p>The project is required to comply with all local and state stormwater requirements to treat stormwater run-off prior to discharging into any city or regional stormwater facilities. After construction is complete, a large majority of the drainage from impervious services within the project site will drain to the Mississippi River through either the southeastern storm sewer tunnel or the Summit Avenue, Mississippi River Boulevard or Goodrich Avenue storm sewer systems.²⁶ Drainage toward the Grotto will be minimally increased, but both quality and runoff control will be improved through new underground filtration devices that will improve water quality and flow conditions.²⁷ Post-construction quality of stormwater runoff from the project site overall will be improved by best management practices to meet state and local treatment requirements.²⁸</p> <p>The project will also be regulated by a Stormwater Pollution Prevention Plan (“SWPPP”) in accordance with the National Pollutant Discharge Elimination System (“NPDES”) permit administered by the Minnesota Pollution Control Agency.²⁹ The SWPPP will cover temporary measures to prevent pollution during construction, including erosion and sediment control and discharge minimization, as well as permanent measures to prevent stormwater pollution after construction is completed.³⁰ The intent of the site design is to allow hydrology to be maintained as it exists today to the Grotto, implementing measures to avoid, minimize or mitigate environmental impacts such as connecting relocated storm sewer pipes into the existing storm sewer upstream of the Grotto outlet, matching existing drainage areas to maintain a consistent volume of stormwater to the Grotto, and discharging building roof water into the Grotto in lieu of the surface parking lot for cleaner discharge.³¹</p> <p>A draft Report of Geotechnical Exploration for the project site, which consisted of twelve (12) penetration test borings throughout the site, concluded that the fill material below ground has variable strength and compressibility, are mostly slow</p>

²⁶ 2024 EAW Update at 32-33 (Section 12.b.ii.)

²⁷ 2024 EAW Update at 32-33 (Section 12.b.ii.)

²⁸ 2024 EAW Update at 33 (Section 12.b.ii.)

²⁹ 2024 EAW Update at 33 (Section 12.b.ii.)

³⁰ 2024 EAW Update at 33 (Section 12.b.ii.)

³¹ 2024 EAW Update at 35 (Section 12.b.iv.)

Comment	Response
	<p>draining and are susceptible to freeze-thaw movements.³² Grading activities within the site will include slope stabilization, where required, by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control.³³ Penetration test borings throughout the project site encountered bedrock at depths of eight (8) feet to twelve (12) feet below ground surface, and groundwater at depths of six (6) feet to twelve (12) feet below ground surface.³⁴ The existing soil and bedrock stability provide adequate support for the use of spread footings for the building.³⁵ The majority of the building will sit above the existing bedrock elevation, therefore avoiding the perched groundwater layer that sits atop the bedrock.³⁶ The portion of the Arena that extends into the bedrock will be replaced with well-draining sands to allow perched groundwater to flow more easily along its intended path, both to lower groundwater levels and toward the Mississippi River.³⁷ The use of drain tile at the building foundations will also allow the groundwater to continue to drain downstream towards the Mississippi River.³⁸ No sinkholes or karst conditions were identified at the project site.³⁹ St. Thomas has incorporated shade trees and increased the landscaped areas with a blend of biodiverse, native, drought tolerant plant species that provide pollinator habitat.</p>
<p>A natural spring exists within the arena site near the Grotto... This spring area would include the outer wall of the planned arena, so if UST is unsuccessful in killing the spring, the structural integrity of the arena could be in peril.</p>	<p>The project area contains the St. Paul Seminary Spring, located near the head of the ravine that slopes toward the Mississippi River identified as the Grotto.⁴⁰ The majority of the building will sit above the existing bedrock elevation, therefore avoiding the perched groundwater layer that sits atop the bedrock.⁴¹ The portion of the Arena that extends into the bedrock will be replaced with well-draining sands to allow perched groundwater to flow more easily along its intended path, both to lower groundwater levels and toward the Mississippi River.⁴² The use of drain tile at</p>

³² 2024 EAW Update at 27 (Section 11.b.)

³³ 2024 EAW Update at 27 (Section 11.b.)

³⁴ 2024 EAW Update at 25 (Section 11.a.)

³⁵ 2024 EAW Update at 25 (Section 11.a.)

³⁶ 2024 EAW Update at 25 (Section 11.a.)

³⁷ 2024 EAW Update at 25-26 (Section 11.a.)

³⁸ 2024 EAW Update at 26 (Section 11.a.)

³⁹ 2024 EAW Update at 26 (Section 11.a.)

⁴⁰ Minnesota Department of Natural Resources Comments, PDF p 300.

⁴¹ 2024 EAW Update at 25 (Section 11.a.)

⁴² 2024 EAW Update at 25-26 (Section 11.a.)

Comment	Response
	the building foundations will also allow the groundwater to continue to drain downstream towards the Mississippi River. ⁴³
The arena’s effects on the bluff area will extend to the wildlife that inhabit the Grotto. Most of them (e.g., foxes, deer, coyotes, waterfowl, turkeys, raptors) restrict themselves to spaces that are not immediately adjacent to human habitat. With the immediate proximity of the building to the bluff, the shadow that the 75-foot high arena would cast for much of the day, and the lack of moisture and resulting loss of vegetation, the grotto and the remainder of this section of the river bluff will become inhospitable as a habitat.	As previously noted, the project site provides minimal wildlife habitat due to the extent of existing impervious surfaces and low coverage of natural vegetation. However, wildlife that can be found within the project site may include songbirds and small mammals that have adapted to an urban environment. ⁴⁴ The project site is not located within any regionally significant ecological areas (RSEA), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, or native plant communities. ⁴⁵ No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat. ⁴⁶
4. The EAW cannot be accepted because it includes transportation routes, utility and other transmission service facilities and corridors on soils susceptible to erosion, areas of unstable soils, and areas with high water tables, all of which are strictly prohibited.	The development will be in compliance with regional and local erosion and sediment control standards. ⁴⁷
The nature of a river bluff is that there is a marked drop-off in ground level, such that soils lack lateral support to keep them in place. Without that support, forces acting vertically or horizontally displace the soil to a lower elevation, which is the essence of erosion. Combined section discussing the bluff impact zone discusses how the incredible size of the arena will choke the supply of groundwater to the westward side along the bluff, and how that deprivation will accelerate erosion as the vegetation dies and loses its hold on the soil. ... Disruption to the natural water table on such a massive scale will surely have ramifications for the surrounding areas.	A draft Report of Geotechnical Exploration for the project site, which consisted of twelve (12) penetration test borings throughout the site, concluded that the fill material below ground has variable strength and compressibility, are mostly slow draining and are susceptible to freeze-thaw movements. ⁴⁸ Grading activities within the site will include slope stabilization, where required, by means of vegetation establishment, erosion control blankets, or other standard methods of erosion and sediment control. ⁴⁹ Penetration test borings throughout the project site encountered bedrock at depths of eight (8) feet to twelve (12) feet below ground surface, and groundwater at depths of six (6) feet to twelve (12) feet below ground surface. ⁵⁰ The existing soil and bedrock stability provide adequate support for the use of spread footings for the building. ⁵¹ The majority of the building will sit above the existing bedrock elevation, therefore avoiding the perched groundwater layer

⁴³ 2024 EAW Update at 26 (Section 11.a.)

⁴⁴ 2024 EAW Update at 39.

⁴⁵ 2024 EAW Update at 40.

⁴⁶ 2024 EAW Update at 42.

⁴⁷ 2024 EAW Update at 27 (Section 11.b.)

⁴⁸ 2024 EAW Update at 27 (Section 11.b.)

⁴⁹ 2024 EAW Update at 27 (Section 11.b.)

⁵⁰ 2024 EAW Update at 25 (Section 11.a.)

⁵¹ 2024 EAW Update at 25 (Section 11.a.)

Comment	Response
	that sits atop the bedrock. ⁵² The portion of the Arena that extends into the bedrock will be replaced with well-draining sands to allow perched groundwater to flow more easily along its intended path, both to lower groundwater levels and toward the Mississippi River. ⁵³ The use of drain tile at the building foundations will also allow the groundwater to continue to drain downstream towards the Mississippi River. ⁵⁴ No sinkholes or karst conditions were identified at the project site. ⁵⁵
The road next to the bluff is just a road, designed to get buses and trucks to and from Summit Avenue. Pursuant to Minnesota Rule 6106.0180, roads are not permitted within 40 feet of the river bluff unless “no alternatives exist.” The site plan includes an alternative, namely the access road directly to Cretin Avenue.	As previously noted, the City is in the process of formal adoption of new ordinance language consistent with Minnesota’s Administrative Rules related to MRCCA, but has not yet completed the adoption. ⁵⁶ According to the Administrative Rules, the City’s existing MRCCA ordinance remains effective until new zoning standards are formally adopted by the City. ⁵⁷ The project site lies within the RC3 River Corridor Urban Open overlay district. The City addressed the RC3 setback requirements in the site plan approval process to ensure the project is in compliance with the applicable regulations.
5. The site plan must be rejected because it interferes with Public River Corridor Views.	The comment that the EAW does not address the project’s “contradiction” with the protection of views from and of the Mississippi River does not address an environmental effect. ⁵⁸ Notwithstanding, the project will not have an impact on identified significant public views, which is consistent with the policy of the City’s Comprehensive Plan. ⁵⁹
MRCCA Publication identifies the scenic overlook at East 36th Street and West River Boulevard in Minneapolis as a Public River Corridor View, and it looks directly at the arena site. The arena would be a dominating presence when viewed across the Mississippi River.	The City’s Comprehensive Plan identifies Public River Corridor Views (“PRCV”) within the Mississippi River Corridor Critical Area on public property. ⁶⁰ Shadow Falls Overlook is located within a quarter mile of the project site, but the view direction is away from the site. ⁶¹ Considering the setback of the area from the Mississippi River Gorge Regional Park, views of the project site from the western bank of the

⁵² 2024 EAW Update at 25 (Section 11.a.)

⁵³ 2024 EAW Update at 25-26 (Section 11.a.)

⁵⁴ 2024 EAW Update at 26 (Section 11.a.)

⁵⁵ 2024 EAW Update at 26 (Section 11.a.)

⁵⁶ 2024 EAW Update at 23 (Section 10.a.ii.)

⁵⁷ 2024 EAW Update at 23 (Section 10.a.ii.); *Property owner information – MRCCA*, Minnesota Department of National Resources, Mississippi River Corridor Critical Area Program, https://www.dnr.state.mn.us/waters/watermgmt_section/critical_area/property-owner-information.html (last visited November 10, 2024); Minn. R. 6106.0070, subp. 2(B).

⁵⁸ ARD Comment at 19.

⁵⁹ 2024 EAW Update at 46 (Section 16)

⁶⁰ 2024 EAW Update at 46 (Section 16)

⁶¹ 2024 EAW Update at 46 (Section 16)

Comment	Response
	Mississippi River will be minimal. ⁶² Views from the surrounding area would be similar to those experienced currently as an institutional facility. ⁶³ UST has shared preliminary renderings at initial community meetings and site plan approval stages, and will continue to do so as the project advances.
Specifically, the City legislated a maximum building height in the RC3 River Corridor Urban Open Overlay District. That maximum height is 40 feet.	Under zoning analysis, the more specific height requirements of the CUP are controlling over the general zoning requirements for purposes of height regulation. ⁶⁴ The CUP specifies building height limits for seventy-five feet (75') for the western portion of the project site and sixty feet (60') for the northern and eastern portions. ⁶⁵ All measurements are as defined by the City's building height calculations. ⁶⁶ The facility's structure heights do not exceed the maximum height allowance as defined in the CUP using the City's building height calculations. ⁶⁷
6. The EAW cannot be accepted because it lacks a plan to safeguard hazardous chemicals that is approved by the Pollution Control Agency.	Any hazardous waste materials used or stored during construction and/or operation of the Arena will be disposed of in a manner specified by local or state regulation. ⁶⁸
Erection of an ice arena on the river bluff is not permitted due to the toxic nature of the two main chemicals used in rink refrigeration and the likelihood of a leak. ... City Code provides that no use shall be permitted which is likely to cause pollution of water, as defined in Minnesota Statutes unless adequate safeguards, approved by the state pollution control agency, are provided.	The Arena project will have a generator to provide backup power to the building with a 300-gallon day tank for fuel storage. ⁶⁹ The chilled water system and ice rink cooling systems for the building will include chillers and piping systems holding refrigerant, fluids, and other necessary chemicals. ⁷⁰ Any hazardous waste materials used or stored during construction and/or operation of the Arena will be disposed of in a manner specified by local or state regulation. ⁷¹ The project will also include preventative measures to reduce risk of the common causes for failure of ice systems and liquid spills, including a subfloor heating system to help reduce the risk of subfloor permafrost, which is a common cause for failure of ice systems and liquid spills, a sealant over the concrete floor for any rooms storing potentially hazardous materials, and a zero permeable vapor barrier is provided below the floor as well. Additional preventative measures include an emergency exhaust

⁶² 2024 EAW Update at 46 (Section 16)

⁶³ 2024 EAW Update at 46 (Section 16)

⁶⁴ 2024 EAW Update at 25 (Section 10.b.)

⁶⁵ 2024 EAW Update at 24 (Section 10.a.iii.)

⁶⁶ 2024 EAW Update at 24 (Section 10.b.)

⁶⁷ 2024 EAW Update at 25, 46 (Sections 10.b., 16)

⁶⁸ 2024 EAW Update at 38 (Section 13.c.)

⁶⁹ 2024 EAW Update at 38 (Section 13.c.)

⁷⁰ 2024 EAW Update at 38 (Section 13.c.)

⁷¹ 2024 EAW Update at 38 (Section 13.c.)

Comment	Response
	system, refrigerant monitoring system in compliance with state mechanical codes and recommendations of ASHRAE Standard 15 and IAAR, spill prevention plan, and Ammonia Plant Safety Program. ⁷² St. Thomas employs trained professionals with experience operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus. ⁷³ St. Thomas is licensed as a hazardous waste generator through Ramsey County, and no change in licensure is required by the arena project. ⁷⁴
To protect the community from potential chemical risks, including ammonia refrigeration system operations, the U.S. EPA region 1 (Minnesota is region 5) passed an “Emergency Planning and Right-to-Know Act.” ... The Minnesota Department of Health, designates permanent rules for indoor ice arenas, Minnesota Rules Ch. 4620, but there is no system in place to notify the public of their risk of hazard exposure or safety procedures in the event of a chemical leak.	The project will incorporate an ammonia-based refrigerant plant for the ice rinks and will implement safety plans to handle ammonia use appropriately. ⁷⁵ St. Thomas will have an Ammonia Plan Safety Program, which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. ⁷⁶ The Ammonia Plan Safety Program will ensure compliance with applicable laws and regulations.
<p>7. The EAW must be rejected because it does not adequately analyze greenhouse gases (GHGs).</p> <p><i>a. The EAW does not analyze greenhouse gases for the phased project.</i></p> <p>The EAW analysis of GHG omits Schoenecker, the Microgrid Center, and the SPS parking lot. The EAW does not state that the former facilities are being razed, indicating the addition of Schoenecker and the Microgrid Center represent complete 100% gains in facility space.</p>	<p>The 2024 EAW Update appropriately included construction-related emissions for the Arena and the Microgrid Project, and operations-related emissions for the Arena, Microgrid Project and Schoenecker Center, as noted in Section 18 and Appendix B. Further, the 2024 EAW Update Transportation Analysis Addendum, Appendix D to the 2024 EAW Update, notes that Loras Hall was demolished to construct the Schoenecker Center, and that the Microgrid Project is a reconstruction of the Owens Science Hall loading dock and the University’s greenhouse, which will be demolished to construct the Microgrid Project.⁷⁷ The 2024 EAW Update thus makes clear that the projects were not a 100% gain in facility space. Nevertheless, the 2024 EAW Update accurately accounts for the operational Schoenecker Center GHG emissions on an annual basis, and notes that the Schoenecker Center has been certified with a LEED Gold rating.⁷⁸ The Saint Paul Seminary (SPS) Parking Lot project was added to the 2024 EAW Update project scope as it is a known, nearby project even if it is by a separate legal entity and not a phased action of the Arena. Vehicle-based emissions for the SPS Parking Lot were</p>

⁷² 2024 EAW Update at 38 (Section 13.c.)

⁷³ 2024 EAW Update at 38 (Section 13.c.)

⁷⁴ 2024 EAW Update at 39 (Section 13.c.)

⁷⁵ 2024 EAW Update at 49 (Section 18.a.)

⁷⁶ 2024 EAW Update at 38 (Section 13.c.)

⁷⁷ Transportation Analysis at 1-2.

⁷⁸ 2024 EAW Update at 50.

Comment	Response
	<p>excluded as vehicles are already parking within St. Thomas parking lots, therefore vehicle-related emissions are not increased to the project site by the addition of the project. Further, as noted in Section 18 and Appendix D, the addition of the Schoenecker Center and Microgrid Projects to campus result in an increase in lab, classroom, office, and collaboration space, but they do not necessarily correlate to additional vehicular trips or parking demand.⁷⁹ <i>The ITE Trip Generation Manual, 11th Edition and ITE Parking Generation Manual, 5th Edition</i> (industry standards typically used for traffic and parking studies), only provide data linking enrollment or school population (students, faculty, and staff) to vehicular trips and parking demand on college campuses.⁸⁰ As such, vehicle-based omissions for these projects were properly excluded.</p>
<p>The Site Plan does not satisfy or address the goals of the City of Saint Paul Climate Action and Resiliency Plan. . . . The 2024 EAW Update contains no statement that the project meets the Climate Action Plan or the 2040 Comprehensive Plan.</p>	<p>To the extent this comment asserts that the EAW was required to evaluate compliance with the Climate Action and Resiliency Plan or the 2040 Comprehensive Plan, this is incorrect. An EAW is “a brief document which is designed to set out the basic facts necessary to determine whether an environmental impact statement is required for a proposed action.” Minn. Stat. § 116D.04, subd. 1a(c). An EAW does not determine whether a proposed project complies with laws or policies, but provides information for the responsible governmental unit to make such determinations.</p>
<p>The EAW did not measure new vehicle trips generated by the Arena. . . . The biggest omission in the EAW is GHG generated by the fans it attracts to its games. (Numerous ¶¶ restate this in different ways.)</p>	<p>The 2024 EAW Update appropriately included an analysis of new vehicle trips generated by the Arena as noted in Section 18, Section 20, Appendix C, and Appendix D. The anticipated number of vehicles and vehicle miles traveled for the redevelopment were based on the trip generation and modes of transportation described in Section 20 and Appendix D, and based on the event parking demand analysis.⁸¹ The 2024 EAW Update appropriately included GHG emissions related to vehicle trips generated by the Arena (including fans attracted for games), as noted in Section 18 and Appendix C and in compliance with the July 8, 2024 Opinion from the Minnesota Court of Appeals. GHG emissions related to vehicle trips generated by the Arena were calculated using the University of New Hampshire methodology to understand the potential metric tons of carbon emissions for the anticipated vehicles coming to the site for events held within the Arena and the estimated metric tons of eCO₂ is 341.85 metric tons per year.⁸²</p>

⁷⁹ Transportation Analysis at 2.

⁸⁰ Transportation Analysis at 2.

⁸¹ 2024 EAW Update at 52.

⁸² 2024 EAW Update at 52.

Comment	Response
<p>The EAW emissions estimate omits many key contributors to GHG in the Arena, including refrigeration and A/C, chemical fire suppressants, industrial gases, employee commuting, and travel of employees and teams to away games. The EAW failed to follow Minnesota Environmental Quality Board guidance to provide project-specific emissions sources, describe the methods used to quantify emissions, describe the process used to determine emissions and, most importantly, to describe “any GHG emission sources not included in the total calculation.</p>	<p>The 2024 EAW Update and the 2023 EAW appropriately excluded refrigerants from the GHG analysis, as they are approximately less than five percent of the total GHG emissions of a building.⁸³ The 2024 EAW Update and 2023 EAW further notes that the Project will use ammonia-based refrigerants for the ice rinks, which is considered an acceptable non-ozone depleting alternative for ice rinks.⁸⁴ Electricity usage for the operations of the Arena, including any usage related to operating the ice rinks, and related GHG emissions are accounted for in Appendix C.⁸⁵ The Minnesota Environmental Quality Board’s guidance does not recommend including chemical fire suppressants in a GHG analysis, and any release of chemical fire suppressants are only anticipated in emergency situations. As to industrial gases, the 2024 EAW Update notes that the Project does not plan to purchase gases during operation or land use conversions.⁸⁶ The 2024 EAW Update also notes that vehicular traffic for visiting teams are not analyzed as this travel already occurs to the existing venues where St. Thomas athletic events are held and there will not be a resulting increase in such travel from the Arena.⁸⁷ The same reasoning extends to the travel of employees and teams to away games. Further, the comment notes that the University has 138 sports employees. Although this number is from outside the EAW and of unknown origin, assuming it is accurate for the sake of response to comments, these are current employees and they are already commuting to the University for sporting events.</p>
<p><i>b. Emissions from Trucks</i> The Site Plan does not include a place for buses to park during games and they will park illegally on one of the nearby residential streets that do not allow parking without a permit.</p>	<p>The 2024 EAW Update appropriately noted that vehicular traffic for visiting teams and fans, including charter busses currently travel to and from campus for basketball and hockey games, and thus the Arena will not result in an increase in these vehicle emissions.⁸⁸ As to the Site Plan and bus parking, this comment is speculative. St. Thomas provides a Visitor’s Guide to all visiting athletic teams. The Visitor’s Guide provides directions for where the visiting team must be dropped off and where the visiting team bus must park if on campus during the event. Whether to use that bus parking location or travel off campus to eat/rest is at the discretion of the visiting team bus driver.</p>
<p>The EAW does not analyze the buses for visiting teams and fans, vendor trucks, and waste hauling.</p>	<p>The 2024 EAW Update appropriately excluded vehicular traffic for visiting teams and fans from the GHG analysis as these conditions currently exist and would not</p>

⁸³ 2024 EAW Update at 49.

⁸⁴ 2024 EAW Update at 49.

⁸⁵ 2024 EAW Update, Appendix C.

⁸⁶ 2024 EAW Update at 49.

⁸⁷ 2024 EAW Update at 52.

⁸⁸ 2024 EAW Update at 52.

Comment	Response
	see an increase due to the Arena. ⁸⁹ Similarly, vendor deliveries and waste hauling are currently existing conditions, especially since St. Thomas manages waste and recycling produced by the campus internal to their campus operations.
<p><i>c. Emissions from Buses</i></p> <p>The EAW does not account for visiting team buses because teams now come to campus for basketball games and go to Saint Thomas Academy for hockey games. The location of Saint Thomas Academy is different than UST. The Site plan does not provide designated parking spaces for buses. These will park on residential streets.</p>	<p>The 2024 EAW Update appropriately noted that vehicular traffic for visiting teams and fans, including charter buses currently travel to and from campus or other areas of the Twin Cities Metro area for basketball and hockey games, and thus the Arena will not result in an increase in these vehicle emissions.⁹⁰</p>
<p>The EAW does not account for GHG from shuttle buses. These will park on residential streets.</p>	<p>The 2024 EAW Update GHG analysis notes that the anticipated number of vehicles and vehicle miles traveled were based on the trip generation and modes of transportation described in Section 20. The transportation study does not assume shuttle buses, other than those already operated by the University. The 2024 EAW Update notes that the operation of shuttle bus, such as the one this comment refers to, would reduce vehicle demand by 25 to 75 vehicles. As such, if a shuttle bus as this is utilized, GHG emissions would be reduced. Further, a shuttle bus such as this is a proposed strategy to reduce parking demand on campus, and is not a finalized plan. For these reasons, the exclusion of a shuttle bus or shuttle buses from the analysis is a conservative approach that presents an accurate GHG emission calculation without mitigation. The concern that a shuttle bus would be permitted to idle in a permit-restricted parking area is speculative.</p>
<p><i>d. Emissions from Cars</i></p> <p>The EAW did not evaluate the impact of cars idling in traffic.</p>	<p>As noted in Section 18 of the 2024 EAW Update and Appendix C, per the EQB’s guidance, vehicle GHG emissions are not reviewed or analyzed for an EAW, outside of understanding the potential carbon footprint of any fleet vehicles owned by the project proposer or during construction.⁹¹ GHG emissions related to passenger vehicle travel have been evaluated using the University of New Hampshire methodology to understand the potential metric tons of carbon emissions for the anticipated vehicles coming to the site for events held within the Arena and the estimated metric tons of eCO₂ is 341.85 metric tons per year.⁹² The extent to which vehicles may be idling due to traffic ranges depending on event attendance, time of year, and mitigation measures ultimately adopted by the City. However, the 2024 EAW Update estimate of GHG emissions is a reasonable analysis of the anticipated GHG emissions resulting from fan travel to and from games.</p>

⁸⁹ 2024 EAW Update at 52.

⁹⁰ 2024 EAW Update at 52.

⁹¹ 2024 EAW Update at 51.

⁹² 2024 EAW Update at 52.

Comment	Response
<p>8. The EAW must be rejected because it is unsafe for pedestrians, motorists, and residents.</p>	<p>Pedestrian and traffic infrastructure, event management, traffic management and safety, and parking mitigation strategies have been implemented in the site plan approval process to reduce parking demand on campus, improve mobility, and minimize community impact as actual events occur at the arena.⁹³</p> <p>A Transportation Study for the project site was prepared with the original Environment Assessment Worksheet, and has since been supplemented with an addendum as part of the 2024 EAW Update (collectively, the “Traffic Analysis”).⁹⁴</p> <p>The proposed development required the creation of a Transportation Demand Management Plan per City Code, the process for which was completed and included as part of the site plan approval.⁹⁵ St. Thomas understands that a certificate of occupancy for the Arena will not be issued until there is substantial conformance with implementation of or documented plans for mitigation measures related to transportation effects.⁹⁶</p>
<p><i>a. Pedestrians</i></p> <p>There are two types of pedestrians at issue: residents and Arena attendees. ... As described in UST’s traffic study, these intersections will degrade to a level of service of E/F during Arena events. The delays experienced by vehicles unable to turn onto Cretin will be worse for pedestrians; vehicles are capable of rapid acceleration to take advantage of small gaps in traffic. ... The entrance to the APF is just west of the intersection of Cretin and Grand Avenues. ... UST has now changed its plan to make that intersection totally non-functional both before and after games. ... The thousands of spectators who parked in the neighborhood south of campus will also be crossing Grand Avenue at this same location. ... All of these combined flows of pedestrians will continue to conflict with traffic as they walk from Cretin Avenue toward the Arena.</p>	<p>The project site is currently served with sidewalks and signalized intersections, programmed with leading pedestrian interval timing, surrounding St. Thomas’s campus.⁹⁷ As part of the site plan approval process, St. Thomas prepared the APF Access Addendum to address changes to pedestrian access assumptions since the original Environmental Assessment Worksheet and provide additional recommendations. Infrastructure improvements include construction of a new traffic signal and curb extensions at the Cretin Avenue and Grand Avenue intersection, widening pedestrian facilities on the northwest quadrant and along the north side of Grand Avenue, and construction of southeast Cretin Avenue access to South Campus for service vehicles, emergency vehicles and potential shuttle and bussing services.⁹⁸</p> <p>St. Thomas will also be implementing a comprehensive event management plan designed to minimize transportation impacts and enhance safety and efficiency during events, which shall incorporate input from stakeholders and be adjusted from time to time as needed based on real-world experiences and feedback.⁹⁹ Additionally, several event management recommendations are proposed to minimize pedestrian/vehicular conflicts and enhance pedestrian safety, such as</p>

⁹³ 2024 EAW Update at 58-62 (Section 20.c.)

⁹⁴ 2024 EAW Update at 53 (Section 20.a.)

⁹⁵ 2024 EAW Update at 54 (Section 20.a.)

⁹⁶ 2024 EAW Update at 58 (Section 20.c.)

⁹⁷ 2024 EAW Update at 54 (Section 20.a.)

⁹⁸ 2024 EAW Update at 58-59 (Section 20.c.)

⁹⁹ 2024 EAW Update at 59 (Section 20.c.)

Comment	Response
	<p>employment of traffic control officers at the Cretin Avenue and Grand Avenue and/or Cretin Avenue and Summit Avenue intersections.¹⁰⁰ Traffic control officers have the ability to stop pedestrians and traffic to allow vehicles exiting the parking ramp to make a left-turn movement. This can also be achieved through event-specific traffic signal improvements and timing plans at signalized intersections.¹⁰¹ St. Thomas also proposes to assign parking attendants to designated event parking facilities, designate pedestrian routes and provide wayfinding campus-wide as well as long Grand Avenue, implement sidewalk closures and an alternative access solution to the Arena from the Anderson Parking Facility should event operations and pedestrian conflicts be determined by the City to be problematic.¹⁰²</p>
<p><i>b. Motorists</i></p> <p>UST's new traffic design would degrade the former predicted E/F levels of service to levels that would be below F if such a lower grade existed. That would affect not just Cretin and Grand, but all intersections into which this backup would extend... The increased risk of accidents involving motorists results not just from the high concentration of vehicles that the Arena would bring, although that is certainly a factor. The conflict of northbound and southbound cars on Cretin Avenue turning into the APF at the same time while pedestrians have the green light to cross in front of them is a certain recipe for disaster. Assuming that the cars yield, the backups caused up and down Cretin will increase congestion for the majority of cars, who do not have a reserved spot in the APF.</p>	<p>The Traffic Analysis estimated pre-event and post-event peak hour trip generation for a maximum capacity event at the project site, based on assumptions discussed and revised by St. Thomas and the City throughout the study process.¹⁰³ Note the Multipurpose Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm) and is only expected to last for 20-30 minutes before and after the event. Capacity analysis results identifying the level of service at intersections affected by the project indicate that pre-event and post-event conditions generally range within acceptable limits in the Twin Cities Metropolitan Area.¹⁰⁴ Based on this analysis, mitigation strategies for traffic congestion and event management have been implemented into the site plan to reduce event-related congestion, many of which were discussed above.¹⁰⁵ The intersections with operational issues on the side street approaches (but not overall) are discussed on Page 40 of the Transportation Study, "During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 15 to 30 minutes. These approaches mostly consist of low-volume residential traffic. Communication should be made to area residents and other sources of commuter traffic, so they are aware of potential event traffic and the most efficient route to get to/from their destination."¹⁰⁶ Turn-only lanes and use of traffic control officers</p>

¹⁰⁰ 2024 EAW Update at 59 (Section 20.c.)

¹⁰¹ 2024 EAW Update at 59 (Section 20.c.)

¹⁰² 2024 EAW Update at 59 (Section 20.c.)

¹⁰³ 2024 EAW Update at 54 (Section 20.a.)

¹⁰⁴ 2024 EAW Update at 57-58 (Section 20.b.)

¹⁰⁵ 2024 EAW Update at 57 (Section 20.b.)

¹⁰⁶ 2023 EAW at 38 (Section 20.c.); 2023 Transportation Study at 40.

Comment	Response
	to convert lanes into turn-only lanes during periods of high traffic could be implemented during these pre-event and post-event conditions as well. ¹⁰⁷ To this end, St. Thomas’s event management plan will be considered a living document and will be modified as needed based on the attendance, traffic, and parking data gathered during the monitoring period. Modifications must follow the processes outlined in the Findings of Fact document. Following the conclusion of the initial monitoring period, the Zoning Administrator will determine whether to extend the monitoring and reporting period.
<p><i>c. Residents</i> Because St. Thomas lacks parking for 1100-1600 vehicles (depending on game attendance and assumptions about how many people ride in each vehicle), these vehicles will drive around the neighborhood, looking for parking. This endangers the safety of surrounding residents because streets that are impassible to cars are also impassible to emergency vehicles.</p>	Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community. There are no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state.
<p>9. The EAW must be rejected because it is not based on relevant information about parking demand.</p>	An event parking demand analysis was completed that maintains the assumptions, available parking supply, and parking demand estimates from the 2023 EAW Transportation Analysis, while incorporating two key updates: correcting a previously inaccurate recording of available adjacent on-street parking supply and accounting for the reduced student seating in the current Arena design. ¹⁰⁸
<p><i>a. UST’s attendance in the Arena’s main hall will likely be higher than 5,500.</i> The EAW does not address standing room tickets and the Arena can hold 1000 more attendees than the seated capacity.</p>	The comment’s suggestion that attendance will exceed 5,500 due to sale of standing room tickets is speculative. St. Thomas will not sell standing room tickets that cause spectator attendance to exceed those thresholds. The 2024 EAW Transportation Analysis Update Memorandum appropriately utilized reasonable estimates of attendance, which are consistent with St. Thomas’ anticipated event attendance. As noted in the 2024 Transportation Analysis, the maximum seating capacity for basketball games within the Arena has been revised since the 2023 EAW Transportation Analysis assumptions. ¹⁰⁹ In the 2023 EAW, the seating capacity for a maximum basketball event was projected to be 5,500 event patrons. ¹¹⁰ However, current designs indicate a capacity of 5,324, with student seating reduced from approximately 22 to 20 percent. ¹¹¹ Given a maximum basketball event represents the worst-case scenario for transportation (congestion and parking), the

¹⁰⁷ APF Access Addendum at 8-9.

¹⁰⁸ 2024 EAW Update at 55.

¹⁰⁹ 2024 Transportation Analysis Update Addendum at 11.

¹¹⁰ 2024 Transportation Analysis Update Addendum at 11.

¹¹¹ 2024 Transportation Analysis Update Addendum at 11.

Comment	Response
	original capacity of 5,500 has been retained throughout the addendum and the student/non-student assumptions have been adjusted for 20% student seating to provide a conservative estimate. ¹¹² Further, for the purposes of the 2024 Transportation Analysis and the event parking demand analysis, all men’s hockey games are assumed to be maximum capacity events to take a conservative approach. ¹¹³
<p><i>b. and c. The EAW does not contemplate the probability that people other than event attendees will be present at the Arena/ UST campus, including for simultaneous events.</i></p> <p>The EAW states that all event staff, coaches, and players will park in Lot O but this will not provide enough spaces.</p>	<p>The 2024 Transportation Analysis indicates that University players, coaches, and event/vendor staff will park in Lot O and other commuter lots within campus, and not in parking facilities used for event patrons.¹¹⁴</p>
<p>Other events may be held in the Arena auxiliary space or on the UST campus at the same time as major events in the Arena.</p>	<p>The 2024 Transportation Analysis acknowledged that simultaneous events at the Schoenecker Center Performance Hall alongside larger events at the Arena are expected to further increase congestion and potential parking deficits on campus, and recommended to avoid scheduling other on-campus events in any space on campus that would attract non-student/staff visitors who require on-site parking during events held at the Arena with attendance of 2,100 or greater.¹¹⁵ This measure was recommended to reduce compounding impacts of multiple events. For purposes of the Traffic Study, “other on-campus events that would attract outside nonstudent/staff visitors” was assumed to be an event with approximately 75 or more outside visitors. In addition, the 2,100 threshold for Arena events is recommended for weeknight events. Because parking supply is higher on the weekends, it would be reasonable to use a higher threshold for Arena events, such as 3,000, on weekends. The auxiliary ice sheet will not be utilized in well attended events within the main Arena sheet of ice. The 2024 EAW Update properly analyzed the impact of concurrent events on campus and established an operational parameter at which such events should not be scheduled.</p>
<p><i>d. The EAW erroneously assumes a high number of passengers per vehicle.</i></p> <p>The 2.75 AVO utilized in the transportation study is artificially high.</p>	<p>The 2023 Transportation Study used an estimate of 2.75 event patrons per vehicle based on a combination of data collected at multiple events at Allianz Soccer Stadium, local event studies, numerous technical resources, and event travel characteristics around the Twin Cities and county.¹¹⁶ The Minnesota Court of Appeals addressed the challenge to the 2.75 average vehicle occupancy (AVO) rate</p>

¹¹² 2024 Transportation Analysis Update Addendum at 11.

¹¹³ 2024 Transportation Analysis Update Addendum at 12.

¹¹⁴ 2024 EAW Update at 57, Table 14 fn.1;

¹¹⁵ 2024 Transportation Analysis Update Addendum at 5, 11, 19.

¹¹⁶ 2023 Transportation Study at 23.

Comment	Response
	used in the 2023 Transportation Study and found this reasoning sufficient to support the use of a 2.75 AVO. ¹¹⁷
<p><i>e. The EAW contains unrealistic assertions of student attendance. Twenty percent (20%) student attendance at games is unrealistically high because only 2500 students live on campus.</i></p>	<p>The 2023 Transportation Study utilized a modal split assumption between students and non-students based on the number of student section seats currently proposed for the Arena of approximately 1,200 for basketball.¹¹⁸ Further, student modal split distributions were developed based on the number of students that live within 3/4 -mile of the Arena and the number of transit passes owned.¹¹⁹ As noted in the 2024 Transportation Analysis, the student seating section was reduced from 22% of the Arena to 20% of the Arena.¹²⁰ As these seats are planned to be reserved for student use, the 2024 EAW Update appropriately utilizes these figures in its analysis.</p>
<p><i>f. Campus shuttle is limited during event times. The EAW mentions the campus shuttle but it only runs once an hour after 5:30 pm.</i></p>	<p>The 2024 EAW Update appropriately notes that the University of St. Thomas provides a shuttle bus between the Saint Paul campus and the Minneapolis campus, is free for staff and students, and runs every 20-30 minutes on weekdays from 6:00 am to 5:30 pm. A shuttle bus is run in the evenings starting at 6:00 pm and stops once per hour at each campus. Shuttle service is reduced during the January Term (J-Term) and summer months. There is no shuttle service on weekends and holidays.¹²¹ Thus, the 2024 EAW Update appropriately evaluated the availability of transit and/or other alternative transportation modes, as established by the EQB in its EAW guidance.</p>
<p>10. The EAW must be rejected because it is not based on relevant information about available parking supply.</p>	<p>An event parking demand analysis was completed that maintains the assumptions, available parking supply, and parking demand estimates from the 2023 EAW Transportation Analysis, while incorporating two key updates: correcting a previously inaccurate recording of available adjacent on-street parking supply and accounting for the reduced student seating in the current Arena design.¹²²</p>
<p><i>a. The 2023 Parking Count was intentionally skewed. Inclement weather during the weekend of the SRF Parking Counts skewed the results.</i></p>	<p>The 2023 Transportation Study acknowledged the weather on March 30, 2023 and April 1, 2023, noting that there was a snowstorm on Friday night (3/31) into Saturday morning (4/1) during the SRF parking counts; however, the storm started after the Friday afternoon counts and the Saturday weather (40 degrees and sunny) generally cleared the roadways by the time of the Saturday afternoon counts,</p>

¹¹⁷ *In re City of St. Paul's Decision on the Need for an EIS for the Proposed Univ. of St. Thomas Multipurpose Arena*, A23-1656 (Minn. Ct. App. July 8, 2024).

¹¹⁸ 2023 Transportation Study at 23-24.

¹¹⁹ 2023 Transportation Study at 23-24.

¹²⁰ 2024 Transportation Analysis Update Addendum at 11.

¹²¹ 2024 EAW Update at 55.

¹²² 2024 EAW Update at 55.

Comment	Response
	therefore, the parking counts as it relates to event availability are considered representative of typical conditions for the campus area. ¹²³
<p><i>b. The 2023 parking count is irrelevant to today's parking demand.</i></p> <p>UST has increased the incoming class size for both undergraduate and graduate programs. The 2023 parking counts do not capture the 2024 demand for parking.</p>	<p>The 2024 Transportation Analysis noted that enrollment has been largely consistent over the last three years, with enrollment in courses physically held on the St. Paul campus ranging from approximately 6,220 students in Spring 2022 to 6,290 students in Spring 2024.¹²⁴ Since the pandemic, there have been significant advancements and opportunities for online classes and telecommuting at the University which has helped keep the enrollment in classes held on campus lower than pre-pandemic numbers.¹²⁵ While the University aims for gradual expansion going forward, enrollment in classes held on campus is expected to remain relatively consistent through the analysis period (2025), therefore, vehicular demand is expected to remain similar to existing conditions.¹²⁶ In addition, considering the permitted parking system on campus and the expected Arena event times (i.e. Arena events are generally held at night (~7 pm) on weekdays and not during peak times for classes, which are generally around 1 pm), any potential increase in enrollment is anticipated to have minimal impacts on event parking/operations at the proposed Arena.¹²⁷</p>
<p><i>c. The 2024 parking count must be discarded because it does not include the effect that the opening of Schoenecker Center had on parking utilization nor the effects of razing Cretin Hall and opening of the Microgrid Center.</i></p> <p>In its Opinion remanding this environmental study to the City, the Court of Appeals stated, "[T]he transportation study does not consider what impact, if any, events at Schoenecker Center would have on the parking-deficit analysis. This shortcoming must be addressed on remand." Despite this clear directive, the Update does not include any analysis of the impact of Schoenecker, which is now open and occupied.</p>	<p>The 2024 Transportation Analysis noted that The Schoenecker Center and the expansion of the Center for Microgrid Research are both academic building projects that accommodate existing academic programs.¹²⁸ While both projects result in an increase in lab, classroom, office, and collaboration space, they do not necessarily correlate to additional vehicular trips or parking demand.¹²⁹ <i>The ITE Trip Generation Manual, 11th Edition and ITE Parking Generation Manual, 5th Edition</i> (industry standards typically used for traffic and parking studies), only provide data linking enrollment or school population (students, faculty, and staff) to vehicular trips and parking demand on college campuses.¹³⁰ Therefore, enrollment data at the University's St. Paul campus was the focus for assessing the traffic and parking operations of the projects, rather than changes in building square footage.¹³¹</p>

¹²³ 2023 Transportation Study at 11.

¹²⁴ 2024 Transportation Analysis Update Addendum at 2.

¹²⁵ 2024 Transportation Analysis Update Addendum at 2.

¹²⁶ 2024 Transportation Analysis Update Addendum at 2.

¹²⁷ 2024 Transportation Analysis Update Addendum at 2.

¹²⁸ 2024 Transportation Analysis Update Addendum at 2.

¹²⁹ 2024 Transportation Analysis Update Addendum at 2.

¹³⁰ 2024 Transportation Analysis Update Addendum at 2.

¹³¹ 2024 Transportation Analysis Update Addendum at 2.

Comment	Response
	<p>Further, the 2024 Transportation Analysis did update parking utilization counts. To assess whether the opening of the Schoenecker Center has had any impact on parking, parking utilization counts collected by UST in Spring 2023 were compared to the counts collected by UST in Spring 2024.¹³² The comparison was based on occupancy of the campus visitor parking lots, as these are the facilities that are expected to be utilized for events at the Arena.¹³³</p> <p>As outlined on Page 2 of the 2024 EAW Update Transportation Analysis Addendum, technical guidance only provides data linking enrollment or school population to vehicular trips and parking demand on college campuses. Therefore, enrollment at the UST St. Paul campus was the focus for assessing traffic and parking operations of the Schoenecker Center and Microgrid projects, rather than changes in building square footage. Enrollment in courses physically held on the St. Paul campus has been largely consistent over the last three (3) years, therefore, the two projects were anticipated to have minimal impacts on event parking/operations at the proposed Arena.</p> <p>To validate this technical guidance with actual data, readily available parking utilization data collected by UST was used. Note UST collects week-long parking utilization data each fall and spring, and a comparison of this data indicated that available parking actually increased by approximately 3% during weekday evenings (6 pm) after the Schoenecker Center opening, when event traffic is expected to arrive, thereby confirming the validity of the technical guidance. Given the technical guidance and its verification through both enrollment data and available parking data, it was not deemed necessary to collect new on-street parking counts immediately adjacent to campus. In addition, the on-street parking adjacent to campus, shown as purple lines in Figure 1, had only 9 % (35 spaces) available during the weekday midday peak and 23% (84 spaces) available during weekday evenings (6 pm), indicating that these spaces were already heavily utilized with little additional capacity available.</p> <p>A comparison of the 2023 parking utilization counts to the 2024 parking utilization counts shows that parking utilization within the visitor lots has remained relatively consistent, despite the removal of the non-visitor parking lots, the Schoenecker Center being open, and the construction of the Arena being underway.¹³⁴ In general, the available parking supply at the visitor parking facilities has decreased by approximately five (5) percent during the weekday peak (1:00 p.m.), whereas the available parking supply has actually increased by approximately three (3)</p>

¹³² 2024 Transportation Analysis Update Addendum at 3.

¹³³ 2024 Transportation Analysis Update Addendum at 3.

¹³⁴ 2024 Transportation Analysis Update Addendum at 3.

Comment	Response
	<p>percent during weekday evenings (6:00 p.m.), when event traffic is expected to arrive.¹³⁵ Given that the Spring 2023 counts (which were utilized within the 2023 EAW Transportation Analysis) showed less available parking supply during weeknight events than the latest counts (Spring 2024), the Spring 2023 counts were continued to be utilized within the updated event parking demand analysis to provide a conservative estimate.¹³⁶ The 2024 Transportation Analysis further notes that, unlike the Schoenecker Center and Arena projects, the Microgrid Project is not expected to displace or remove any campus parking.¹³⁷ The 2024 Transportation Analysis concluded that the Schoenecker Center and Microgrid Projects are expected to have minimal impacts on parking.¹³⁸</p> <p>Two new residence halls were added to north campus in 2020, which significantly expanded on-campus housing. Despite the demolition of Cretin Hall, St. Thomas has a similar number of students in on-campus housing in fall 2024 as compared to fall 2023. On the 10th day of fall classes in 2023, St. Thomas had 2,910 students living in on-campus housing. On the tenth day of fall classes 2024, St. Thomas had 2868 students living in on campus housing. Housing numbers vary year to year. In addition, many commuter students live within walking distance of campus. Assertions that removal of Cretin Hall impact parking supply are speculative. In addition, any such changes can be effectively mitigated through the monitoring and update process for the Event Traffic Management Plan.</p>
<p><i>d. There is no such thing as “Relocated Parking.”</i> Reallocating parking permits will cause students to move vehicle from on-campus parking to on-street parking.</p>	<p>An EAW is “a brief document which is designed to set out the basic facts necessary to determine whether an environmental impact statement is required for a proposed action.” Minn. Stat. § 116D.04, subd. 1a(c). The purpose of an EAW is not to resolve any environmental issue, but to identify potential issues and potential mitigation measures. The 2024 EAW Update has identified potential parking shortage mitigation measures.¹³⁹ One such mitigation measure involves the University’s plan to reduce resident parking permits for first- and second-year students in Level 2 of the Morrison Hall parking ramp, with the anticipated result being that students will refrain from bringing their vehicles to campus.¹⁴⁰ As noted in the 2024 Transportation Analysis, reallocating these permits to commuter and faculty use during weekdays, additional spaces could be cleared for events in the</p>

¹³⁵ 2024 Transportation Analysis Update Addendum at 3.

¹³⁶ 2024 Transportation Analysis Update Addendum at 3.

¹³⁷ 2024 Transportation Analysis Update Addendum at 3.

¹³⁸ 2024 Transportation Analysis Update Addendum at 5.

¹³⁹ 2024 Transportation Analysis Update Addendum at 18.

¹⁴⁰ 2024 Transportation Analysis Update Addendum at 18.

Comment	Response
	evening and weekends, resulting in an additional 105 parking spaces for use. ¹⁴¹ The Transportation Analysis further recognizes that this plan, if implemented will need to be monitored to determine whether students are not bringing vehicles to campus and utilizing on-street parking. ¹⁴² In this way, the 2024 EAW Update and Transportation Analysis properly included an evaluation of potential mitigation measures that may be implemented to limit potential impacts, if any, of the Arena.
<p><i>e. The potential construction of a parking lot by the St. Paul Seminary does not affect UST's Parking Count.</i></p> <p>The construction of the SPS parking lot is not guaranteed and the Update cannot rely on SPS's plans to claim that UST can accommodate 70 additional vehicles.</p>	The 2024 EAW Update does not rely on any additional parking spaces from the SPS parking lot in its event parking demand analyses. The 2024 EAW Update references that, if the SPS parking lot is completed, available parking is expected to increase by approximately 40 to 70 spaces, depending on the night, but that these parking spaces are not included in the deficit/surplus parking space figures. ¹⁴³
If the 2024 EAW Update is going to consider the SPS parking lot as part of the phased development, it must also consider the planned SPS welcome center.	The SPS Parking Lot project was submitted to the City of Saint Paul for site plan approval in July 2024, and if approved, is anticipated to begin construction in early 2025. ¹⁴⁴ The Seminary is a neighboring land owner; the City and St. Thomas are not aware of any site plan proposal by the Seminary for a welcome center.
11. An EIS is required to analyze the full impact of the year-round use of the Arena.	The Traffic Analysis and any updates or addendums thereto have been prepared and generate estimates based on maximum capacity events. ¹⁴⁵
<p>St. Thomas argues that community and the planning commission should ignore the public representations of UST's administrator that UST expects 35 sell-out events each winter. ... UST pushes this narrative to downplay its net loss of 265 parking spaces and the lack of infrastructure in this residential neighborhood to handle traffic and parking. ... The UST administrator was accurate and reflected the efforts of UST to build winning basketball and hockey programs through recruitment and enhanced facilities so that UST can fill this Arena. This alternative would mean that the traffic study in the EAW does not accurately reflect the traffic and parking problems this Arena will cause. ... The EAW must address the predictable situation in which 1,000 or more standing room tickets are sold for the new Arena.</p>	<p>The attendance projections are data-driven, based on other Division 1 programs within UST's conference (or future conference for men's hockey), excluding the top and bottom capacity programs. The Traffic Analysis estimated pre-event and post-event peak hour trip generation for a maximum capacity event at the project site, based on assumptions discussed and revised by St. Thomas and the City throughout the study process.¹⁴⁶ A maximum capacity (sold-out) basketball game on a weeknight was the focus of the transportation study analysis as it represents the "worst-case" from an attendance, parking, and traffic perspective.¹⁴⁷ The maximum attendances for hockey and basketball that were analyzed in the 2024 EAW Update are intended maximum attendances. St. Thomas will not sell standing room tickets that cause spectator attendance to exceed those thresholds. The event</p>

¹⁴¹ 2024 Transportation Analysis Update Addendum at 18.

¹⁴² 2024 Transportation Analysis Update Addendum at 18.

¹⁴³ 2024 EAW Update at 57, Table 14 fn.3; 61, Table 16 fn.2.

¹⁴⁴ 2024 EAW Update at 2

¹⁴⁵ 2024 EAW Update at 54 (Section 20.a.)

¹⁴⁶ 2024 EAW Update at 54, 57-58 (Section 20.a., 20.b.)

¹⁴⁷ 2024 EAW Update at 59 (Section 20.c.); 2024 Transportation Analysis Update Addendum at 6, 11-12.

Comment	Response
<p>UST is building this Arena as a midsize venue for rental. It seems probable that UST’s plan to finance its arena will include frequent rentals for maximum-capacity crowds. At a public meeting on April 30, 2024, UST chief of staff Amy McDonough acknowledged that UST plans to rent out the arena to generate revenue. Because UST has not fully disclosed the full extent of its planned use of the Arena, the City should assume that UST will be using the facility as often and as fully as it is allowed to use it. This means assuming full attendance for every event, and for maximum year-round use for large events. Once it is assumed that UST will fully utilize the Arena, it is even clearer that locating the Arena on the South Campus is inappropriate for multiple reasons: parking, traffic congestion, danger to pedestrians, motorists, and residents.</p>	<p>management plan will analyze multiple levels of event attendance in order to fit mitigation measures consistent with each scale of event.¹⁴⁸</p> <p>The 2024 EAW Update (pg 6) states that the Arena includes one building to house a dual-purpose competition venue for the University’s hockey and basketball programs_The arena’s primary use is hockey and basketball, with the ability to host other events. The primary scheduled, reoccurring use of the Arena is for basketball and hockey events and therefore was selected as the focus of the Traffic Analysis.¹⁴⁹ Notwithstanding, the 2024 EAW Update Transportation Analysis Addendum provides insight into potential events beyond athletics.¹⁵⁰ Most “non-athletic events” are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure, will be infrequent (limited to a few days or weeks each year) and scheduled during summer or other non-academic periods.¹⁵¹ St. Thomas will also be mindful of anticipated event sizes and avoid scheduling other events simultaneously with sporting events at the Arena that may result in a potential parking deficit on campus.¹⁵² A maximum capacity “non-athletic event” is anticipated to operate nearly identical to a maximum capacity basketball event and would adopt similar mitigations strategies.¹⁵³ As such, it is expected that any large “non-athletic events” will be further explored as part of the event management plan, when the feasibility and demand for such events becomes more evident.¹⁵⁴</p> <p>As previously discussed in Comment 8, several mitigation strategies and improvements were identified as part of the Traffic Analysis, including facilitation of travel modes other than private vehicle (free transit passes, discounted rideshare, and restaurant/bar shuttle service), permit modifications and parking ramp restrictions, and parking assignments through pre-paid event ticketing.¹⁵⁵ The parking ramp operations were modeled to represent maximum capacity event conditions.¹⁵⁶</p>

¹⁴⁸ 2024 EAW Update at 59 (Section 20.c.)

¹⁴⁹ 2024 Transportation Analysis Update Addendum at 9.

¹⁵⁰ 2024 Transportation Analysis Update Addendum at 10.

¹⁵¹ 2024 Transportation Analysis Update Addendum at 11.

¹⁵² 2024 Transportation Analysis Update Addendum at 11.

¹⁵³ 2024 Transportation Analysis Update Addendum at 11.

¹⁵⁴ 2024 Transportation Analysis Update Addendum at 11.

¹⁵⁵ 2024 EAW Update at 59-60 (Section 20.c.)

¹⁵⁶ 2024 Transportation Analysis Update Addendum at 6.

Comment	Response
<p>12. The EAW must be rejected because it does not adequately investigate or mitigate effects on wildlife.</p>	<p>No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat.¹⁵⁷</p>
<p><i>a. The rusty patched bumble bee</i> There are eleven records of the rusty patch bumble bee’s existence within the site, but the EAW notes that the already disturbed nature of the project site is not likely to provide a suitable habitat.</p>	<p>The 2024 EAW Update determined that although the project site is located within a high potential zone of the rusty patch bumble bee, the disturbed nature of the project site is not likely to provide suitable habitat. If applicable, the DNR recommended reseeding disturbed soils with native species of grasses and forbs using Board of Water and Soil Resources (BWSR) or Minnesota Department of Transportation (MnDOT) seed mixes.¹⁵⁸ The USFWS Dkey for the RPBB has been completed and a no effect determination has been received.</p>
<p><i>b. Species of “Special Concern”</i> The Kentucky Coffee Tree and Swamp White Oak exist within the project site and the EAW did not investigate environmental effects of development to these species.</p>	<p>Kentucky Coffee and Swamp White Oak trees are proposed to be planted as a part of the proposed projects. For example, 1 Kentucky Coffee tree and 1 Swamp White Oak tree are proposed to be removed within the project site (as listed in Table 8), but 2 Kentucky Coffee trees and 4 Swamp White Oaks are proposed to be planted as a part of the Arena project alone.</p>
<p><i>c. Bird species</i> The EAW acknowledged the South Campus is within an Important Bird Area (IBA) but does not contain analysis of the impact to birds and does not provide mitigation measures.</p>	<p>The 2024 EAW Update notes that the project site is located within the Mississippi River IBA. According to the DNR, IBAs are voluntary and non-regulatory part of an international conservation effort to bird populations. The constructed Schoenecker Center and planned Arena will be to scale in comparison with other buildings located on the University of St. Thomas South Campus. The Arena will be required to comply with applicable City of Saint Paul lighting and bird-safe glass ordinance language. Fixture modeling and photometric analysis will be completed for all building lighting to analyze light levels for the project.¹⁵⁹</p>
<p><i>d. Coyotes, foxes, waterfowl, turkeys and raptors</i> The EAW does not identify coyotes, foxes, waterfowl, and raptors.</p>	<p>The 2024 EAW Update explains that the site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation. However, wildlife that can be found within the project site may include songbirds and small mammals that have adapted to an urban environment.¹⁶⁰ Yet, the project site is not located within any regionally significant ecological areas (RSEA), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, or native plant communities.¹⁶¹ The 2024 EAW Update concluded that no impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat.¹⁶² Additionally, based on recommendations from the DNR,</p>

¹⁵⁷ 2024 EAW Update at 42.

¹⁵⁸ 2024 EAW Update at 43.

¹⁵⁹ 2024 EAW Update at 44.

¹⁶⁰ 2024 EAW Update at 39.

¹⁶¹ 2024 EAW Update at 40.

¹⁶² 2024 EAW Update at 42.

Comment	Response
	a review of federally listed threatened, endangered, and proposed species which may occur within the proximity of the project site was completed through the UWSFWS IPaC tool. A resource list generated for the project site identified nine species which should be considered. ¹⁶³ This did not identify any of the animals identified in this comment.
<p>13. The EAW does not address the impacts on Summit Avenue and the West Summit Avenue Historical Preservation District</p>	<p>The Heritage Preservation Commission has approved construction of the project, no adverse visual effects are anticipated, and event and traffic mitigation strategies will reduce event-related issues along Summit Avenue.¹⁶⁴</p> <p>The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave.</p>
<p>Summit Avenue is part of the West Summit Avenue Heritage Preservation District. That district was established in 1980 to preserve the historical nature of Summit Avenue west of Lexington Avenue.</p>	<p>The northern portion of the project site is located within the Summit Avenue West Heritage Preservation District.¹⁶⁵ In November 2023, the Heritage Preservation Commission approved construction of the Arena building.¹⁶⁶</p>
<p>With an Arena, Summit would carry traffic from neighborhoods east of UST, particularly as a means of avoiding the backlog on Cretin Avenue as thousands of cars drive from Interstate 94 toward campus. The conversion of Summit Avenue as a conduit for stadium traffic would destroy the residential and historical character of the avenue.</p>	<p>Generally, views from the surrounding area would be similar to those experienced currently, as current and future land use is within an institutional facility and there are buildings of similar massing already in the area.¹⁶⁷ Changes in views for the Arena would be most noticeable from portions of Goodrich Avenue and from the Grand Avenue right-of-way.¹⁶⁸ The project will conform with the City’s regulations for screening and lighting, and adverse visual effects are not anticipated.¹⁶⁹ The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave.</p>
<p>The burden on Summit is compounded by the fact that the Arena’s service road connects directly to Summit. All trucks and buses servicing the Arena will enter on Cretin Avenue and exit on Summit (there is no place for such large vehicles to turn around and go back to Cretin Avenue). That means all of the food vendor trucks (e.g., Sysco), beer trucks, soda trucks, equipment trucks, garbage trucks, recycling trucks, and team buses will travel on Summit Avenue. Summit will deteriorate into a private commercial drive for UST heavy traffic.</p>	<p>The quantity of team buses for each event in the arena (football games generally require more buses) is assumed to be one visiting team bus based on past events. The Cretin Ave service drive access point was added during the Site Plan Review process to reduce the service usage of the Summit Ave access point into the South Campus parcel. Service vehicles will enter and exit through the Cretin Ave service drive and will utilize the proposed parking lot south of the Arena to turnaround. Parking will be restricted during loading hours in order to allow those movements</p>

¹⁶³ 2024 EAW Update at 43.

¹⁶⁴ 2024 EAW Update at 45-46, 58-60 (Sections 15-16, 20.c.)

¹⁶⁵ 2024 EAW Update at 45 (Section 15)

¹⁶⁶ 2024 EAW Update at 45 (Section 15)

¹⁶⁷ 2024 EAW Update at 46 (Section 16)

¹⁶⁸ 2024 EAW Update at 46 (Section 16)

¹⁶⁹ 2024 EAW Update at 46 (Section 16)

Comment	Response
<p>... All cars, delivery vans, service vehicles, garbage trucks, and other vehicles that previously entered from Cretin would be required to drive down Summit Avenue and into the Summit Entrance.</p>	<p>to occur. [Buses may need to exit the site via the existing connection to Summit Avenue, but in doing so would only traverse east-bound Summit (adjacent to the campus and not residences) to Cretin Avenue.] St. Thomas also proposes to provide event wayfinding campus-wide,¹⁷⁰ which may include any visiting team shuttle services for routing and pick-up/dropoff locations.</p> <p>Note the Multipurpose Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event-related traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7 to 9 am and 4 to 6 pm),¹⁷¹ and is only expected to last for twenty (20) to thirty (30) minutes before and after an event.¹⁷² All delivery vehicles would be planned to occur outside of event periods, presumably during the morning hours of weekdays. The project proposer will need to finalize service vendors to specify scheduling.</p>
<p>Smaller vehicles will also use Summit Avenue. The only conceivable location where taxi/Uber/Lyft vehicles would discharge and pick up customers near the Arena is through the entrance from Summit Avenue, which goes to the Arena and has a turn-around circle.</p>	<p>Discounted rideshare and shuttle services from remote parking lots and other popular locations for event patrons are being required as part of the Event Management Plan.¹⁷³ These mitigation measures are also suggested in the Traffic Analysis.¹⁷⁴ While rideshare and shuttle services will help reduce parking impacts to the surrounding neighborhood as well as the number of vehicles traveling near the Arena, and while preliminary shuttle service, routing plans, and pick-up/dropoff locations have been identified, details will be finalized in the EMP and discussed as a part of the rideshare incentive agreements and shuttle services agreements. It is inaccurate that the only conceivable location for taxi, Uber and Lyft vehicles is the entrance from Summit Avenue.</p>
<p>Because basketball and hockey are winter sports, the headlights of trucks and buses leaving through the Summit Entrance will be on and aimed straight at residential properties on the north side of Summit Avenue.</p>	<p>Based on the likely number of buses exiting to Summit Avenue during nighttime hours, the instances of headlights shining on Summit Avenue residences when these vehicles exit to Summit is likely to be far less frequent than contemplated in the ARD Comment. All delivery vehicles would be planned to occur outside of event periods, presumably during the morning hours of weekdays. The project proposer will need to finalize service vendors to specify scheduling. Prior to the removal of the surface parking lots, far more passenger vehicles had the ability to use the Summit Avenue access point based on the configuration and quantity of the surface parking lots than what is proposed with the current site plan.</p>

¹⁷⁰ 2024 EAW Update at 59 (Section 20.c.)

¹⁷¹ 2023 Transportation Study at 4.

¹⁷² 2024 Transportation Analysis Update Addendum at 9.

¹⁷³ 2024 EAW Update at 59-61 (Section 20.c.)

¹⁷⁴ 2024 Transportation Analysis Update Addendum at 9, 19-20.

Comment	Response
<p>The St. Paul City Council has designated Summit Avenue a “parkway.” Vehicles driving on parkways may not exceed 9,000 pounds. All of the various trucks and buses accessing the Arena through the Summit Entrance vastly exceed the parkway limit of 9,000 pounds.</p>	<p>The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave.</p>
<p>The site plan includes space for bus parking. Because they will not be able to park at the Arena, they will have to exit the South Campus, leaving out the Summit Entrance and re- entering Summit Avenue</p>	<p>St. Thomas’s event management plan will be monitored on an ongoing basis, with frequency of monitoring at the discretion of City staff.¹⁷⁵ As previously mentioned, St. Thomas proposes to provide event wayfinding campus-wide,¹⁷⁶ which may include any visiting team shuttle services for routing and pick-up/dropoff locations.</p>
<p>14. The EAW must be rejected because it lacks effective mitigation strategies.</p>	<p>The EAW includes numerous mitigation measures related to potential environmental impacts resulting from the Project. The City, as RGU, will make a decision as to what mitigation measures will be required in connection with the Project. Any final decision on environmental review will include binding mitigation measures.</p>
<p>The mitigation strategies relating to greenhouse gases are described in Item 18.b.i on page 50 of the Update, but where the EAW form directs the City to “[d]escribe and quantify reductions from selected mitigation” and “[e]xplain why the selected mitigation was preferred,” the EAW does neither, stating only “The proposed mitigation listed in Item 18.b.i includes the best management practices for new construction and reducing GHG emissions where practicable during operations.”</p>	<p>The mitigation measures listed represent best management practices for new construction and reducing GHG emissions where practicable during operations. Where quantification information is available, it is provided in the EAW. The amount of reduction attributable to certain measures will depend on actual operations.</p>
<p>A large part of the EAW’s failure to provide effective mitigation strategies is that the effect of the development on the environment is not fully described. UST has withheld damaging information about the size of other venues on campus (including the second ice rink but including other venues holding hundreds or even 1,000 people).</p>	<p>The EAW fully discusses the new and recent development on Campus and addresses environmental impacts from the Schoenecker Center and other new or recent developments on campus. Other existing venues were considered as part of the existing condition on campus. Page 19 of the 2023 EAW Study lists attendance information for other campus facilities. As noted on page 10 of the 2024 EAW Update Transportation Analysis, youth sports practices (which will use the auxiliary rink or practice courts) are expected to attract 50 or fewer attendees. The auxiliary ice rink is not anticipated to significantly increase the capacity of the Project.¹⁷⁷ As part of the EMP, St. Thomas will avoid scheduling events at other campus locations, including the auxiliary ice sheet, in order to avoid compounding traffic and parking impacts with larger arena events.</p>
<p>A larger part of the problem is that no mitigation strategy can be effective unless it is binding. The EAW does not propose any binding measures, like because UST’s consultants wrote the EAW. The UST campus is subject to a CUP and inclusion of a mitigation measure in the CUP would create a binding</p>	<p>The decision as to mitigation measures is made by the RGU in the context of making a decision as to whether an EIS is needed for a Project. An EAW is a brief document designed to set out the basic facts necessary to determine whether an EIS is needed for a project – it is an informational document. The mitigation</p>

¹⁷⁵ 2024 EAW Update at 59 (Section 20.c.)

¹⁷⁶ 2024 EAW Update at 59 (Section 20.c.)

¹⁷⁷ 2024 Transportation Analysis Update Addendum at 10.

Comment	Response
<p>obligation, but the EAW does not propose any changes to the CUP. Like the 2023 Negative Declaration that was rejected on appeal, the EAW and Update lack any meaningful mitigation strategies.</p>	<p>measures are subject to ongoing regulatory authority as described further in the Findings of Fact.</p>
<p>Appendix to Appeal filed by Advocates for Responsible Development: Safety Risks of Planned University of St. Thomas Arena</p>	<p>Thank you for your comment. This appendix appears to be the “Appendix A” referred to on page 33 of ARD’s comment. It was written by Dr. Jerome Abrams who separately commented on the draft EAW.</p> <ul style="list-style-type: none"> • The expected attendance and frequency of events is outlined in the 2024 EAW Update Transportation Analysis. St. Thomas did not make a statement in the EQB Monitor that there will be 35 events of 5500 attendees per year. • As noted, the only on-street parking spaces included in the event parking supply are the 369 spaces on streets immediately adjacent to the UST campus and do not require a city permit. These spaces are illustrated with purple lines on Figure 1 within the 2024 EAW Update Transportation Analysis Addendum. • Pedestrian and traffic infrastructure, event management, traffic management and safety, and parking mitigation strategies have been implemented in the site plan approval process to reduce parking demand on campus, improve mobility, and minimize community impact as actual events occur at the arena.¹⁷⁸ • A Transportation Study for the project site was prepared with the original Environment Assessment Worksheet, and has since been supplemented with an addendum as part of the Traffic Analysis.¹⁷⁹ The proposed development required the creation of a Transportation Demand Management Plan per City Code, the process for which was completed and included as part of the site plan approval.¹⁸⁰ St. Thomas understands that a certificate of occupancy for the Arena will not be issued until there is substantial conformance with implementation of or documented plans for mitigation measures related to transportation effects.¹⁸¹ • The project site is currently served with sidewalks and signalized intersections, programmed with leading pedestrian interval timing,

¹⁷⁸ 2024 EAW Update at 58-62 (Section 20.c.)

¹⁷⁹ 2024 EAW Update at 53 (Section 20.a.)

¹⁸⁰ 2024 EAW Update at 54 (Section 20.a.)

¹⁸¹ 2024 EAW Update at 58 (Section 20.c.)

Comment	Response
	<p>surrounding St. Thomas’s campus.¹⁸² As part of the site plan approval process, St. Thomas prepared the APF Access Addendum to address changes to pedestrian access assumptions since the original Environmental Assessment Worksheet and provide additional recommendations. Infrastructure improvements include construction of a new traffic signal and curb extensions at the Cretin Avenue and Grand Avenue intersection, widening pedestrian facilities on the northwest quadrant and along the north side of Grand Avenue, and construction of southeast Cretin Avenue access to South Campus for service vehicles, emergency vehicles and potential shuttle and bussing services.¹⁸³</p> <ul style="list-style-type: none"> • St. Thomas will also be implementing a comprehensive event management plan designed to minimize transportation impacts and enhance safety and efficiency during events, which shall incorporate input from stakeholders and be adjusted from time to time as needed based on real-world experiences and feedback.¹⁸⁴ Additionally, several event management recommendations are proposed to minimize pedestrian/vehicular conflicts and enhance pedestrian safety, such as employment of traffic control officers at the Cretin Avenue and Grand Avenue and/or Cretin Avenue and Summit Avenue intersections.¹⁸⁵ Traffic control officers have the ability to stop pedestrians and traffic to allow vehicles exiting the parking ramp to make a left-turn movement. This can also be achieved through event-specific traffic signal improvements and timing plans at signalized intersections.¹⁸⁶ St. Thomas also proposes to assign parking attendants to designated event parking facilities, designate pedestrian routes and provide wayfinding campus-wide as well as long Grand Avenue, implement sidewalk closures and an alternative access solution to the Arena from the Anderson Parking Facility should event operations and pedestrian conflicts be determined by the City to be problematic.¹⁸⁷ • Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility,

¹⁸² 2024 EAW Update at 54 (Section 20.a.)

¹⁸³ 2024 EAW Update at 58-59 (Section 20.c.)

¹⁸⁴ 2024 EAW Update at 59 (Section 20.c.)

¹⁸⁵ 2024 EAW Update at 59 (Section 20.c.)

¹⁸⁶ 2024 EAW Update at 59 (Section 20.c.)

¹⁸⁷ 2024 EAW Update at 59 (Section 20.c.)

Comment	Response
	<p>and lessen the potential impact on the neighboring community. There are no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state.</p> <ul style="list-style-type: none"> • The Traffic Analysis estimated pre-event and post-event peak hour trip generation for a maximum capacity event at the project site, based on assumptions discussed and revised by St. Thomas and the City throughout the study process.¹⁸⁸ Note the Multipurpose Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm) and is only expected to last for 20-30 minutes before and after the event. Capacity analysis results identifying the level of service at intersections affected by the project indicate that pre-event and post-event conditions generally range within acceptable limits in the Twin Cities Metropolitan Area.¹⁸⁹ Based on this analysis, mitigation strategies for traffic congestion and event management have been implemented into the site plan to reduce event-related congestion, many of which were discussed above.¹⁹⁰ The intersections with operational issues on the side street approaches (but not overall) are discussed on Page 40 of the Transportation Study, "During both pre-event conditions, multiple unsignalized side-street approaches on Cretin Avenue will be difficult to make left-turn movements for 15 to 30 minutes. These approaches mostly consist of low-volume residential traffic. Communication should be made to area residents and other sources of commuter traffic, so they are aware of potential event traffic and the most efficient route to get to/from their destination."¹⁹¹ Turn-only lanes and use of traffic control officers to convert lanes into turn-only lanes during periods of high traffic could be implemented during these pre-event and post-event conditions as well.¹⁹² To this end, St. Thomas's event management plan will be considered a living document and will be modified as needed based on the attendance, traffic, and parking data

¹⁸⁸ 2024 EAW Update at 54 (Section 20.a.)

¹⁸⁹ 2024 EAW Update at 57-58 (Section 20.b.)

¹⁹⁰ 2024 EAW Update at 57 (Section 20.b.)

¹⁹¹ 2023 EAW at 38 (Section 20.c.); 2023 Transportation Study at 40.

¹⁹² APF Access Addendum at 8-9.

Comment	Response
	<p>gathered during the monitoring period. Modifications must follow the processes outlined in the Findings of Fact document. Following the conclusion of the initial monitoring period, the Zoning Administrator will determine whether to extend the monitoring and reporting period.</p> <ul style="list-style-type: none"> • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.

Tom and Karen Alf

Comment	Response
<p>Karen and I wish to support the Comment dated October 30, 2024 related to the Sept 2024 Updated EAW for the UST arena, (see attached document) submitted by Craig Roen, 183 Mount Curve Blvd, St Paul. We encourage the adoption of the attached 3 proposed measures for any game with an expected attendance greater than 1,500 attendees. Fans want free, easy in/out parking. We respectfully ask the City and St Thomas to add the mitigation strategy or a similar one as outlined in Craig's attached comment.</p>	<p>Thank you for your comment.</p>

Michelle Basham

Comment	Response
<p>I am writing to express my strong opposition to St. Thomas' continued efforts to build a large stadium in the middle of our residential community. This proposal will result in an overwhelming amount of traffic, noise and activity to our community. Furthermore, I am curious why is the city allowing them to continue construction despite multiple court orders requiring them to stop construction?</p>	<p>Thank you for your comment. There are no court orders requiring St. Thomas to stop construction. The Court of Appeals issued an Opinion requiring an updated EAW, which the 2024 EAW Update was created to address.</p>

Gayle Breutzman

Comment	Response
<p>6 - Project Description</p>	

Comment	Response
<p>As stated by the Environmental Quality Board (EQB) in its 2010 Guide To Minnesota Environmental Review Rules: "The EIS is reserved for projects with the potential for significant environmental effects." As per the 2024 EAW Update, the project now encompasses an area of 11.7 acres in the Mississippi River Corridor Critical Area (MRCCA) whereas the 2023 EAW site was only 6 acres. The Total Project Acreage listed in Table 1(Project Magnitude) of the 2024 EQW Update does not include the proposed St. Paul Seminary Parking Lot. If the parking lot acreage is not included in the project magnitude, have the effects of the site actually been evaluated? The 2024 EAW Worksheet Update for the UST Arena and phased projects is arbitrary and capricious. Without question, the phased projects now require an Environmental Impact Statement as defined by the EQB.</p>	<p>Thank you for your comment. The 11.7 acres listed in Table 1 is inclusive of the land area for the SPS Parking Lot project. This is clarified in Section 6.a on page 5 of the 2024 EAW Update. Figures 2-9 show the SPS Parking Lot project area (red boundary) is included in the area analyzed for the 2024 EAW Update; note the difference in color between red and yellow boundaries was to reflect the different property ownership between the projects on UST property vs the project on SPS property.</p>
<p>7 - Climate Adaptation and Resilience</p>	
<p>The Arena and the proposed SPS parking lot will act as an urban heat island as, per the updated worksheet: Surfaces and structures such as roads, parking lots and buildings absorb and reemit more heat from the sun than natural landscapes. During a heatwave (not precisely defined in the worksheet), the site is susceptible to extreme heat. As the temperatures of the climate continue to rise, the Urban Heat Island effect will become more frequent and pronounced, causing increased electricity demand for air conditioning by 1-9% for every two degree increase in temperature (per the EPA. The EPA also states that "during extreme heat events, which are exacerbated by heat islands, the increased demand for air conditioning can overload systems." Companies that supply electricity typically rely on fossil fuel power plants to meet this demand, which in turn leads to an increase in air pollutant and greenhouse gas emissions such as ground-level ozone, fine particulate matter, acid rain, and carbon dioxide (which contributes to global climate change). High temperatures of pavement and rooftop surfaces can heat up stormwater runoff, which drains into storm sewers and raises water temperatures as it is release in to rivers (the Mississippi River). Page 35 of the 2024 EAW Update states that the plan is to "Discharge building roof water to the Grotto in lieu of surface parking lot, since building roof water is relatively clean compared to site water which often contains salts and sediments." It may be cleaner, but it will also be warmer. Rapid temperature changes in aquatic ecosystems resulting from warm stormwater runoff can be stressful or fatal to aquatic life.</p>	<p>Thank you for your comment. Roof stormwater runoff was chosen to drain to the Grotto over site pavement stormwater runoff to meet the stormwater management regulations of the City of St. Paul and the Capitol Region Watershed District. The stormwater management regulations currently in place do not assess the temperature of stormwater runoff. There are no special regulations for temperature control on this segment of the Mississippi River. Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect.</p>

Comment	Response
<p>In Table 2: Climate Considerations and Adaptations; landscaping via shade trees is listed as one of the mitigation solutions UST will employ. In Table 5: From all phases of development, 193 trees will be removed and 127 planted. The addition of the Schoenecker Center phased development has changed the number of trees removed by 65. This drastic loss of mature trees has significant environmental effects, because trees improve air quality through three key impacts:</p> <ul style="list-style-type: none"> -Altering the concentration of pollutants by reducing air temperatures. Reducing energy consumption of buildings (particularly for temperature control), which in turn reduces the consumption of energy from polluting sources (such as fossil fuels). -Directly removing sulfur dioxide, nitrous oxide, carbon monoxide, ozone and particulate matter. <p>With the extensive addition of the phased project acreage, the fact is that fewer trees can be planted secondary to the extensive hardscape (the Ryan Company Site Plan of the arena lists concrete pavement 60,696 square feet). That square footage does not include the arena building, the Schoenecker Center, the St. Paul Seminary (SPS) Parking Lot, and the additional sidewalks and roadways. The hardscape will exacerbate the heat island effect, which is barely mentioned in the 2024 EAW Update for the phased arena project.</p>	<p>Thank you for your comment. The Arena project is seeking a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the buildings and high-reflectance paving materials which helps to offset the heat island effect. Those material upgrades were chosen to be incorporated into the project by UST to offset the heat island effect among other benefits. Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect.</p>
<p>The updated worksheet states that the stormwater facilities will improve water quality and stormwater runoff. How? What will be filtered from the water before it flows back into the Mississippi? Will it cool the runoff or remove the chloride from the salting of the sidewalks, roads and parking lots? And now there will be an additional parking lot on the Mississippi River Boulevard. How will that drain? It will likely drain into the Mississippi River through existing storm drains. Why aren't all of the paved areas in the project permeable? The updated EAW worksheet inadequately mitigates the heat island effect of the phased development. An Environmental Impact Statement is required.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The stormwater facilities (two systems) proposed for the Arena project include StormFilter filtration devices that utilize an enhanced filtration media called Phosphosorb Media. The Phosphosorb Media is engineered to trap particles and adsorb pollutants from stormwater runoff. Pollutants targeted include total suspended solids, phosphorus, heavy metals, and hydrocarbons. • The stormwater facility installed for the Schoenecker Center includes a cistern, filter, and pump system to reuse rainwater runoff for irrigation purposes. • The proposed Microgrid Project will utilize capacity within an existing stormwater facility east of the Anderson Parking Ramp. The BayFilter filtration device removes pollutants such as total suspended solids, phosphorous, metals, nitrogen, trash and hydrocarbons. • The stormwater treatment proposed for the SPS Parking Lot project includes pervious pavers to infiltrate the stormwater runoff into the underlying soil.

Comment	Response
<p>Per the MPCA Chloride Reduction Model Ordinance (Language) from, 2019, chloride is easily transmitted into lakes, streams and groundwater, and threatens drinking water supplies, as well as the health of freshwater fish and other aquatic life. There are several chloride-based deicers used roads and walkways, notably sodium chloride (NaCl), magnesium chloride (MgCl₂) and calcium chloride (CaCl₂). These deicers are sometimes generally referred to as “salt”. It takes only one teaspoon of salt to permanently pollute five gallons of drinking water. Once in the water, there is no easy way to remove the chloride.</p> <p>The impacts of chloride contamination include:</p> <ol style="list-style-type: none"> 1. Drinking water: 75% of Minnesotans rely on groundwater for drinking water. 27% of monitoring wells in the Twin Cities metro area had chloride concentrations that exceeded EPA drinking water guidelines. 2. Fish and aquatic bugs: High amounts of chloride are toxic to fish, aquatic bugs and amphibians. Even at lower levels chloride can cause negative effects. 3. Increased corrosivity in drinking waters: elevated chloride can increase corrosion in distribution systems and can increase the rate of release of lead into water. 4. Plants: Chloride in streams, lakes and wetlands harms aquatic vegetation and can change the plant community structure. 5. Soil: Soil concentrated with salt can lose it’s ability to retain water and store nutrients which can result in an increased risk of erosion and sediment runoff (which also harms water quality). 6. Wildlife: Some birds (finches and house sparrows) can die from ingesting deicing salt. <p>The 2019 Statewide Chloride Management Plan states that winter maintenance activities are a primary source of chloride discharges into lakes, streams, wetlands and groundwater. The UST arena development, alone, will have 60696 square feet of concrete pavement. Again this square footage does not include the additional concrete pavement of the phased project buildings, sidewalks and roadways.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA. • Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area.

Comment	Response
<p>The current EAW has not addressed the deicing (chloride) protocol regarding the proposed arena. As a phased project, the Schoenecker Center must be included. Areas to be addressed include:</p> <ol style="list-style-type: none"> 1. Occupational Licensure for Winter Maintenance Professionals (certification in MPCA’s Smart Salting program in order to operate within their jurisdiction). 2. Deicer Bulk Storage Facility Regulations. <p>-Provide indoor operations for storage of deicing materials to prevent such materials from being affected by rain, snow and melt water.</p> <p>-Storage facility must be located outside of floodplains and (distance to be decided) from lakes, rivers, streams, ditches, storm drains, manholes, catch basins, wetlands and any other areas likely to absorb runoff. A facility must not be located in significant proximity to surface water features, water supplies, wells or dry wells. The Mississippi River is 1/4 mile from the arena site.</p> <p>-The property slope must be away from the facility’s salt, deicer and sand storage area.</p> <p>-Salt vulnerable/intolerant natural areas should be avoided as storage facilities to the extent possible. Where they cannot be avoided, specific measures should be instituted to prevent damage natural areas including (but not limited to):</p> <ul style="list-style-type: none"> * Areas with salt sensitive vegetation. * Areas serving as a source of drinking water (surface and ground water). * Areas with bodies of water with low dilution, low volume or salt sensitive species. * Areas associated with ground water recharge zones or shallow water table, with medium to high permeable soils. <p>3. An applicant for a permit for land-disturbing activity on property other than individual single family home sites must provide a plan for post-construction management of chloride use on he site (see MPCA smart salting requirements). This permit is not requested in the Updated EAW worksheet.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA. • Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area. • The post-construction management of chloride is specific to an MS4 permit issued by the MPCA. The University of St. Thomas does not have an MS4 permit nor is one required. Table 6 on page 18 of the 2024 EAW Update notes that a National Pollutant Discharge Elimination System (NPDES) Permit issued by the MPCA was received for the Arena and Schoenecker Center and will be required for the Microgrid Project and SPS Parking Lot Project.

Comment	Response
<p>With the proposed project in an Minnesota River Critical Corridor, surrounded by neighborhoods, with liquid runoff into the Mississippi River via direct runoff, storm sewers or the grotto, the amended UST arena EAW must address the issue of deicing (chloride use). Currently, the arena will be utilized during winter and spring months, when the most deicer will be used. The amended EAW must include:</p> <ol style="list-style-type: none"> 1. What deicer will be used? 2. How and where will the salt/deicer be stored? 3. What specific mitigation practices will be used to protect the plants, animals and water that will be exposed? 4. Who will monitor chloride levels in soil and water? How will it be reported and to whom? 5. What specific actions will be taken if chloride levels are above safe levels? 6. Will soil and water samples be tested before the arena opens? 	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA. • Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area.
<p>13 - Contamination/Hazardous Materials/Wastes</p>	
<p>The updated EAW Worksheet states that glycol will be used in the chiller cooling coils and ammonia will be used for refrigeration for the ice rinks. Both ethylene glycol and anhydrous ammonia are hazardous and toxic substances and are listed as such with (among other federal agencies) DOT, NIOSH and the EPA. Both are on the Right to Know Hazardous Substance List.</p> <p>On Page 38 the worksheet states that there will be a 500 ton chiller that will hold “approximately 800 pounds of refrigerant and a 112 ton chiller that will hold ~137 pounds of refrigerant. The chilled water piping system will have approximately 4000 gallons of a fluid that is 30% ethylene glycol and 70% water. For the ice rink cooling system there is to be approximately 1,200 pounds of ammonia and ~6,000 gallons of fluid that is 40% glycol and 60% water.”</p> <p>Anhydrous ammonia is highly toxic to humans, with inhalation potentially causing respiratory failure, skin or eye irritation, freezing injuries, unconsciousness and death. Ammonia reacts with moisture in mucous membranes to produce ammonium hydroxide, a corrosive alkaline compound. Failures in welds, piping, hoses or compressor shaft seals are not infrequent in ice rink chiller systems, as many parts of the refrigeration system contain ammonia liquified under pressure (anhydrous ammonia). Ammonia is a strong base and will corrode galvanized metals, cast iron, copper brass or copper alloys.</p>	<p>Thank you for your comment. As noted on page 38 of the 2024 EAW Update: “St. Thomas will have an Ammonia Plant Safety Program which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. St. Thomas does employ trained professionals with experience in operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus.”</p>

Comment	Response
<p>The Emergency Planning and Community Right-to-know Act (EPCRA) was passed in 1986 in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. Chris Parnell, CHMM/ EPCRA Program Administrator for Homeland Security and Emergency Management at the Minnesota Department of Public Safety provided information that places the ammonia quantity of 1200 pounds for the ice rink cooling system in the EPCRA Section 302, 312, 304 and release reporting categories. This requires UST to notify its state emergency response commission and also requires participation, as necessary with the local emergency planning committee in the local emergency planning process. These legal requirements are not noted in the updated EAW Worksheet. They must be included, specifically, for public knowledge and safety.</p>	<p>Thank you for your comment. The Emergency Planning and Community Right-to-Know Act (EPCRA) establishes requirements for federal, state, and local governments, American Indian Tribes, and industry regarding emergency planning and reporting on hazardous and toxic chemicals. The State Emergency Response Commission coordinates the implementation in Minnesota of the federal EPCRA and may adopt rules. The laws relate to planning for emergencies involving hazardous chemicals. The proposed project is not anticipated to be a high quantity generator of hazardous waste and will not store significant amounts of hazardous wastes on site; therefore, this is not applicable.</p>
<p>Marnie L. Prochniak, Supervisor for Workplace Safety Consultation at the Minnesota Department of Labor and Industry stated that the university of St. Thomas is required by Minnesota OSHA statutes 182.653 to develop and use a formal safety and health program, known as an Employee Right to Know program along with documented training on both for all employees exposed to anhydrous ammonia and ethylene glycol. These specifics are not included in the new EAW Worksheet, but must be in writing to insure that the University will comply with Minnesota State Statutes for the safety of their staff and the many neighborhood residents and students that could be affected if an accident or leak with either of these chemicals occurs.</p>	<p>Thank you for your comment. As noted on page 38 of the 2024 EAW Update: "St. Thomas will have an Ammonia Plant Safety Program which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. St. Thomas does employ trained professionals with experience in operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus."</p>
<p>16 - Visual</p>	

Comment	Response
<p>MRCCA Plan Policy CA-10: Regulate building height, placement and design consistent with the intent of the MRCCA rules to protect, enhance and minimize impacts to public river corridor views (PRVC's).</p> <p>MRCCA Plan Policy CA-11: Protect and minimize impacts to public river corridor views from public development activities.</p> <p>The revised EAW worksheet for the arena notes the changes in views from the arena site to be "most noticeable from portions of Goodrich Avenue and from the Grand Avenue right of way." The concrete walls of the arena now obliterate any view of the MRCCA from view when driving west on Grand Avenue. The view from Goodrich Avenue is, again, the view of a concrete wall. The spaces that used to exist between buildings that provided some view of trees and landscape have been razed. The views now are sterile and cold. The dramatic changes in the views from the arena could have only been foreseen by an architect, not by a layperson who now sees the tall, stark walls of the concrete arena when they walk or drive north on Goodrich or west on Grand. The trees native to the site were removed and will not be replaced in the same numbers because of the endless asphalt. Also, because of the increased parking demand, there is a parking lot proposed to be built on the east side of the Mississippi River Boulevard. Another area of asphalt (not listed in Table 1: Project Magnitude) that will remove natural vegetation and degrade the scenic view to any person driving, walking or bicycling along the Mississippi River Boulevard. The EAW language attempts to downplay the change to the views, but the changes are absolutely NOT in character with the Mississippi River Corridor Critical Area intentions to protect the areas natural, cultural and scenic resources.</p>	<p>Thank you for your comment. The 11.7 acres listed in Table 1 is inclusive of the land area for the SPS Parking Lot project. This is clarified in Section 6.a on page 5 of the 2024 EAW Update.</p>
<p>20 - Transportation</p>	

Comment	Response
<p>As in the original UST Arena EAW, the parking facts have been underestimated and were misrepresented. The updated EAW notes the 365 parking spaces were removed for arena construction and adds 73 parking spaces “if the Saint Paul Seminary (SPS) Parking Lot project is completed”. As the SPS parking lot would be on seminary property and is owned by the St. Paul Seminary (as stated on page 7 of the current updated EAW Worksheet) those 73 parking spaces cannot be included in the arena parking estimates as they are for the seminarians. Limiting seminarians and students or staff that have paid for parking in the SPS or Morris Parking Lots to make room for arena attendees is inequitable. The updated EAW Worksheet states that the “total pre-event peak hour generates approximately 1,498 trips and post-event peak generated approximately 1581 trips.”</p> <p>A vehicle trip is defined as “a movement by one or more person in a motor vehicle that begins or ends at a particular location.” The 2023 SRS Transportation study used an auto-occupancy of 2.7. The Federal Highway Administration uses an Average Vehicle Occupancy (AVO) of 1.7.</p> <p>If the AVO of 2.7 is used to determine parking need (per Table 3 in the Transportation Addendum), any Thursday/Weeknight event with an attendance above 2450 persons will have a parking deficit. Friday Night events with over 3475 attendees will have a parking shortage. Saturday Night events with over 3620 attendees will have a parking deficit. In total, there will be 20-21 events per season with a parking deficit (in contradiction to the EAW Update Addendum which states that there will be 12 games with a parking deficit per season). If the AVO of 1.7 is used, any Thursday/Weeknight event with an attendance over 1212 persons will have a parking deficit, as will Friday Night events with attendances over 1553 persons and Saturday Night events with attendances over 1619 persons. Parking deficits using the FHA average vehicle occupancy value of 1.7 would show a parking deficit for at least 31 games per season (conservative estimate). Again, this contradicts the 12 games per season with a parking deficit stated in the 2024 Transportation Addendum to EAW for the arena.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The SPS parking lot is not included in Arena parking estimates, and it will not be used for Arena events. However, seminarians are St. Thomas students and currently park on the St. Thomas campus. As noted in note 3 to Table 14 and note 2 to Table 16 of the 2024 EAW Update, if the SPS parking lot is built, parking supply on the St. Thomas campus is expected to increase from 40-70 spaces. This is because seminarians who currently park on the St. Thomas campus will park in the SPS parking lot, thus freeing up spaces on the St. Thomas campus. • The average vehicle occupancy was based on a combination of data collected at multiple events at Allianz Soccer Stadium, local event studies, numerous technical resources, and event travel characteristics around the Twin Cities and the country. The Federal Highway Administration AVO provided is for general commuter traffic, not events.

Comment	Response
<p>Table1: Available Parking Supply Comparison on Page 3 of the 2024 EAW Transportation Analysis Update Addendum shows 1084 total unrestricted parking spaces on the UST Campus. The surrounding neighborhood is designated for 369 total unrestricted parking spaces weekly (page 55 of the 2024 EAW Update states “Since on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum, the review was focused on the visitor parking facilities, as these are the facilities expected to be used for events held in the Arena.”) If that is true, why does Table 3 (Available Parking Supply Before Events) in the 2024 Transportation Addendum include unrestricted neighborhood spaces?</p> <p>Furthermore, if on-street parking utilization was not collected for the update, the Transportation Addendum for parking is not complete, or accurate. How did the study arrive at 369 unrestricted residential spaces? The total of 1453 parking spaces cannot be confirmed. It must be noted, in addition, that many of the neighborhood parking spaces are restricted until 8:00 PM on weekdays. Events on weekday and on Friday or Saturday evenings start earlier than 8:00 PM. Unless UST is condoning their event attendees to park illegally, this must be factored into the parking availability numbers. Currently, for women’s soccer events (with minimal attendance numbers), there has been considerable illegal parking on neighborhood streets. Why? Because the residential parking spaces are closer to the event location. In cold Winter and Spring months this illegal parking increases as attendees want to walk the shortest distance possible in the cold to attend their event. Illegal parking on residential neighborhood streets with permit parking restrictions is pervasive and has little to no enforcement by UST or non-emergency police parking enforcement. This has not been addressed in the 2024 Arena EAW Addendum. Illegal parking in the residential neighborhoods surrounding the University of St. Thomas must be addressed with specific mitigation measures, including ticketing and towing in a specified period of time. As this mitigation issue is not specifically addressed in the 2024 EAW Update Addendum, the EAW is not complete.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • To clarify, the only on-street parking spaces included in the event parking supply are the 369 spaces on streets immediately adjacent to the UST campus and do not require a city permit. These spaces are illustrated with purple lines on Figure 1 within the 2024 EAW Update Transportation Analysis Addendum. • The comparison of the parking supply in visitor lots (UST collects parking data annually in the fall and spring), which is documented on page 3 of the 2024 EAW Update Transportation Analysis Addendum, was intended to validate with technical guidance that the opening of the Schoenecker Center would not impact event parking/operations at the proposed Arena. Results of the comparison indicated that there is more available parking during weeknight event times than before the Schoenecker Center opening. • The event parking analysis, which is found on Page 14 of the 2024 EAW Update Transportation Analysis Addendum, is generally consistent with what was published within the 2023 EAW Transportation Analysis. Note the only update was a correction of an error in the table. • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.

Comment	Response
<p>The mitigation strategies in the 2024 EAW Update are, again, suggestions. The EAW must have mitigation strategies completed. The 2024 Worksheet Update states that, “When purchasing an event ticket, attendees would also select their choice of transportation to an the event. That is not a specific mitigation strategy. The “Estimated Parking Demand Reduction” numbers are estimates, as stated, not fact. None of the following mitigation strategies are specific:</p> <ul style="list-style-type: none"> - “Work with Metro Transit will offer free transit pass options with the purchase of event tickets.” How many attendees will use this option? Are extra busses running around arena event schedules? At what frequency do the buses run? - “Pursue a partnership with a ride share company to provide discounted rates for event ticket holders.” What ride share company has been enlisted to provide discounted rates for ticket holders? What is be the discounted rate? - “Pursue a collaborative partnership with one or two restaurants and/or bars to offer shuttle services.” What restaurants are providing shuttles to events? How many attendees use restaurant shuttles? What size will the “shuttle” be? - What are the event thresholds for off-site parking/shuttle services? Where will the off-site parking and shuttles be located? How frequently will they run and what will be the times of service? Will the shuttle service be included in the price of a ticket? Will buses be used? A typical coach bus can seat 44-49 people. 	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum show recommended mitigation measures. Required mitigation is included in the Findings of Fact document as a component of determination regarding the need for an EIS. • The Estimated Parking Demand Reductions are projections of potential reductions in parking demand and will need to be monitored and adjusted as events take place to assess the effectiveness of each strategy. This is why the Event Management Plan (EMP) is considered a living document. EMPs are regularly used to effectively manage parking, traffic and pedestrian safety at large events. A primary goal of the EMP and its strategies is to guide event patrons to park in designated areas and to implement strategies that influence behavior in ways that make those options more appealing and convenient. • It is estimated that 2 to 4 percent of the non-student attendance will utilize transit. As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, preliminary discussions have taken place with Metro Transit, primarily focused on the implementation of free transit passes. Discussions have not taken place on additional bus service, rather utilizing the existing bus service within the area. • As mentioned on Page 19 of the 2024 EAW Update Transportation Analysis Addendum, preliminary discussions with two rideshare companies (Uber and Lyft) indicate that discounted rates can be easily implemented. To clarify, these discounted rates would not be provided by the rideshare company, but rather would occur at the cost of UST. The discount pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan. Discounts can be easily implemented by providing a unique code when event patrons purchase tickets. This code can then be applied when users take a rideshare to/from a geofenced location (i.e. campus), offering a seamless way to incentivize and manage transportation options. • UST has had preliminary discussions with potential locations and several restaurants and bars are interested in partnerships. In addition, the Office of Alumni Affairs will coordinate events before games at establishments with shuttle partnerships. Specific partnerships and details on restaurant/bar shuttles are expected to be finalized and outlined as part of the EMP. • The attendance thresholds for off-site parking/shuttle services are summarized on Page 20 within the 2024 EAW Update Transportation

Comment	Response
	<p>Analysis Addendum (i.e. 4,350 on a weeknight, 4,775 on a Friday night, and 5,200 on a Saturday night). UST has had preliminary discussions with Allianz Field to utilize their parking lot for shuttle services, which has sufficient available parking to accommodate the anticipated deficits. The parking and shuttle services are expected to be provided at no cost to event patrons. However, parking pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan. Specific details on service times, bus types, and shuttle frequencies will be finalized and outlined as part of the EMP.</p>
<p>One of the listed mitigation solutions in the 2024 EQW Transportation Analysis Update Addendum is the plan “to reduce resident parking permits for first and second-year students in Level 2 of the Morrison Hall Parking Ramp. UST anticipates that when these permits are reduced, students without permits will refrain from bringing their vehicles to campus; however, this will need to be monitored.” Again, another suggestion by UST that is not specific mitigation. Who will monitor the student parking in residential areas? Students already use residential streets as parking for cars and homeowners are unable to get these cars removed by UST or the police. UST has no specific mitigation plan to address student parking in permitted residential areas, a problem that will only increase as UST uses parking ramp spaces for arena attendees instead of students. The students and employees of UST should be prioritized for UST on-campus parking, as education of students is a part of UST’s designation as a nonprofit.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.

Comment	Response
<p>Appropriate Mitigation Procedures would include:</p> <p>-It is acknowledged that there is a probability that some attendees may attempt to park for free in the surrounding neighborhoods and walk to the arena. As a part of the Traffic Management Plan (TMP), a traffic monitoring program would be developed that would include surveys of onstreet parking spaces in the surrounding residential neighborhood during different types of events and on non-event days. If it is determined that project-generated vehicles are parking off-site in the surrounding neighborhoods on a recurrent basis, Saint Paul area police must coordinate with areas from being impacted any parking demand generated by arena events. Potential mitigation measures would include strict enforcement of existing parking regulation by ticketing and/or towing illegally parked vehicles, or by implementing new parking regulations on the streets in the surrounding areas.</p> <p>-Pre-paid parking assignments must be sold with tickets and enforced, until lots are full, otherwise event attendees will park as close to their destination as possible (the neighborhood streets) for free.</p> <p>-Reserved parking permits can be issued based on the amount tickets purchased (e.g., one parking space per every four tickets purchased). Discounts could be provided for arena attendees that arrive and park on-site early, with additional discounts for large carpools. This would also reduce attendee confusion and greenhouse gas emissions by guaranteeing a parking spot in a specific location.</p> <p>-Recommended driving directions and parking locations could be given to attendees when purchasing tickets, helping to minimize congestion and circulation in trying to find parking spaces, reducing greenhouse gases.</p> <p>-Increase bus services to accommodate bus rider trips made by arena patrons. Increases in service would be coordinated with the MTC as a part of the Traffic Management Plan(TMP) For the arena.</p> <p>-Increase frequency of UST inter-campus shuttles, especially on weekends and evenings of events. Designate parking for patrons using the inter-campus shuttles.</p> <p>-For major events with high expected attendance levels, social media services such as Facebook and Twitter/X could be used to recommend that arena patrons carpool, arrive early and/or use public transportation.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts. • These event management strategies offer benefits and will be considered to enhance the EMP. Several of these strategies have already been recommended and are expected to be implemented, such as pre-paid parking assignments, event monitoring, clear driving directions/parking locations, and the use of social media for communication. • Other strategies, such as offering parking priorities or discounts for carpooling and increasing transit/bus shuttle services, will continue to be evaluated as part of the EMP. The feasibility of these strategies may depend on the sophistication of the parking management system and the demand for transit and shuttle services.

Comment	Response
<p>As a part of the proposed project, a comprehensive Traffic Management Plan (TMP) must be developed that would include a traffic monitoring program that could be used to determine the extent to which traffic diversions may occur as a result of traffic congestion caused by project-generated vehicle trips. Before the opening of the arena, the scope of work for the program must be developed. The scope of work must include collecting several types of field data (e.g., Automatic Traffic Recorder (ATR) counts along Cretin Avenue and at major roadways in the local street network, turning movement counts and field observations at key intersections, vehicle occupancies, on- and offsite parking utilization and/or transit ridership. Surveys of arena patrons to understand their origins, and destinations and the travel characteristics used by attendees in traveling to and from different types of events must be conducted. The TMP would help identify the transportation demand management measures and operational strategies that would be most effective and those that are not, thus enabling continued improvement for the TMP on a regular basis and allowing it to adapt to reflect actual conditions. If it is determined that such traffic diversions are occurring on a recurrent basis at unacceptable levels, potential mitigation measures to address such impacts would involve refinements to the TMP. The TMP would be reevaluated by the University of Saint Thomas on an annual basis in conjunction with community advisory councils, the Minnesota Department of Transportation, St. Paul Police, and parking enforcement personnel and surveys, including residents of neighborhoods within 0.5 miles of UST.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • An event management plan (EMP) is a requirement of the EAW and will incorporate various post-event monitoring and adjustments based on real-world experiences and feedback. The post-event monitoring tasks will include, but are not limited to, the following: (1) Event signal timing plans will be developed and refined based on event operations at I-94/Cretin Avenue and along the Cretin Avenue corridor. (2) Multiple events will be observed, and recommendations will be provided to improve event operations and safety. (3) Attendance data will be tracked and compared to the attendance projections published within the EAW. (4) An EMP working group will be established, and multiple meetings will be held to assess what aspects are working well and which need improvement. • These event monitoring tasks are consistent for events of this size. However, the additional data collection and recommendations provided will be reviewed and discussed with the project team.
<p>An on-site event transportation coordinator must be included as a part of the arena project to coordinate and manage the TMP. The transportation coordinator would be responsible for coordinating traffic, parking, transit, pedestrian and/or shuttle bus operations on or around the site. This person would also coordinate with transportation agencies, public safety organizations, parking and shuttle bus operators, and/or ride share operators to ensure the effective implementation of the TMP. In addition, the on-site event transportation coordinator would be responsible for daily monitoring of other key local streets of concern to the community with regard to volume changes and congestion.</p>	<p>Thank you for your comment. As part of the EMP, UST will designate an event transportation coordinator to oversee and manage the EMP, as well as serve as the primary point of contact for other agencies and the public.</p>

Comment	Response
<p>Since the original 2023 EAW, the University of St. Thomas has joined the National Collegiate Hockey Conference (NCHC) and will be a full-time member beginning with the 2026-27 season. The NCHC Website states that, in 2026, the NCHC will move its playoffs to a three-week tournament held entirely on campus sites. The NCHC Website states that the Anderson Arena will be “state-of-the-art” and will have three visiting team locker rooms and full student-athlete support services. It must be expected that UST plans to host (at least a part of) this tournament at the arena. As NCHC Commissioner Heather Weems was quoted in the 5/15/24 NCHC Website article as stating, “The window of opportunity arose quickly, and we worked efficiently with our Board of Directors, Athletics Council, and the University of St. Thomas to achieve expansion.” She goes on to thank St. Thomas President Rob Vischer and Vice President and Director of Athletics Phil Estes “for their vision and investment in hockey.” The Transportation Addendum includes 6-9 additional Men’s Hockey games with attendance assumed to be maximum capacity. This additional data, in itself, makes the 2023 EAW Transportation Study and, therefore, the 2024 addendum invalid. New traffic and transportation studies need to be mandated to address the updated numbers of what willow be year-round use of the arena, with more events and higher attendance numbers. The 2024 Transportation Analysis Update Addendum lists events that were not listed in the 2023 EAW including six USTj Commencement sessions in May (maximum attendance), High School Commencements May and June, external events and Club Room rentals. Keeping a list of events, including non-sporting events (which have barely been mentioned), and notifying residents is not mitigation.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The projected attendance changes expected as a result of the UST men's hockey team joining the NCHC is documented on Pages 11 and 12 of the 2024 EAW Update Transportation Analysis Addendum. For the purpose of the event parking demand analysis, all men's hockey games were assumed to be maximum capacity events. The event operations analysis, which was updated from the 2023 EAW Transportation Study, is based on a worst-case maximum capacity basketball event (i.e. 5,500 attendees). • As a result, the increase in hockey attendance does not affect the event operations analysis conducted as part of the study. However, several of the same event management strategies are expected to be implemented for both hockey and basketball games. • Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. As part of the EMP, UST will maintain an online event calendar accessible to residents, which could potentially list high-level attendance ranges. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.

Kathy and Dave Brudevold

Comment	Response
<p>10 - Land Use</p> <p>1) It appears that the UST arena does not meet the height and setback limitations. Permits should not have been approved. 2) Construction should not be allowed to continue until there is an approved EAW and EIS, if also required.</p>	<p>Thank you for your comment. The structure height(s) are described in Table 1 on page 8 of the 2024 EAW Update, along with a definition of how building height is calculated within the City of St. Paul Zoning Code (see footnote on page 8 of the EAW). Compliance with the height and setback requirements are described on pages 23-25 of the 2024 EAW Update and have been addressed in the Site Plan Approval process. The building height and restrictions in the CUP control, as described in the second paragraph on page 25.</p>
<p>20 - Transportation</p>	

Comment	Response
<p>We live at 2208 Sargent Ave, 3 blocks directly south of the south campus. At present, street traffic reaches maximum capacity regularly. Cretin Ave is not built for the capacity it currently carries. How can one reasonably expect it to accommodate up to 5500 event attendees arriving either by vehicle or on foot. The intersection of Cretin and Grand is totally inadequate to process the quantity of vehicles and foot traffic projected. Emergency vehicles will have no chance to navigate – there is absolutely no space to allow them emergency access.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm), and is only expected to last for 20-30 minutes before and after the event. • A new traffic signal and pedestrian sidewalk improvements (i.e. relocated traffic signal cabinet and widened facilities) are expected to be constructed at the Cretin Avenue and Grand Avenue intersection. In addition, depending on the event size, traffic control officers are expected to be positioned at the intersection to help manage traffic and pedestrians safely and efficiently. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP. • The project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. The project site is located in SPPD Fire District One, with the nearest stations being Station 14 (Snelling Avenue near Marshall), Station 20 (Vandalia and University), and Station 19 in (Edgecumbe Road). All stations house EMT teams in addition to fire apparatus. This is in addition to ambulance services associated with hospitals/health care systems in Saint Paul. The proposed site is located in the Western Patrol District of SPPD. All first responders generally use major routes to reach a service/call site and have signal priority where needed.
<p>Student parking on neighborhood streets continues to increase as less housing is available on campus. Additionally, the trend toward duplexes and other dwellings that can house up to 12 occupants fills streets with cars on a daily basis. (example— Goodrich Ave from Cretin to Finn) Many streets have resorted to permit parking in order to park near their homes, and there are more permit parking requests to come.</p> <p>EAW traffic and parking projections appear not to recognize the Arena traffic and parking to be an added burden to already existing traffic and parking. Vendors, arena staff, and additionally campus employees and staff when asked to move out of ramp parking, etc will need to access neighborhood parking. All traffic and parking must be included in mitigation projections. Mitigation plans must provide for maximum capacity scenarios.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Existing traffic and parking conditions were analyzed in the 2023 EAW Transportation Study and updated as needed in the 2024 EAW Update Transportation Analysis Addendum. • As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, St. Thomas will pair the time of day restrictions with early communication and clear notification to its internal staff, faculty, and commuting students prior to enforcing the event parking restrictions. This system is currently used for large events. St. Thomas will proactively work with faculty and the registrar to schedule online classes as necessary to reduce the number of vehicles coming to campus, to ensure the ramp clearing strategy is effective. Student residents with full time parking permits will not be displaced to avoid spillover to the neighborhood.

Comment	Response
<p>EAW does not include a projection of number of events to be hosted in the Arena. Rental use of the Arena has the same traffic and parking impacts on the neighborhood.</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>
<p>The annual Halloween Block trick or treating event on Sargent Ave is a good example of the realities of event parking. Parking is crazy as vehicles navigate narrow streets to find parking. Oncoming cars cannot pass each other on the narrow streets with parked vehicles on either side. Cars are parked across street facing driveways. Add snow and you have an impossible situation. This is a fun once a year event but too much to ask of a neighborhood on a regular basis.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts. • The project involves no proposed changes to the existing roadway widths or locations of public parking.
<p>Impact on neighborhood quality of life is not recognized in the EAW. Traffic and parking for UST students are already issues for the neighborhood. And now UST is handing to the neighborhood the burden of parking that they are failing to provide for their own event attendees. And the events are bringing in a level of traffic and parking that our neighborhood is not designed to handle.</p>	<p>Thank you for your comment.</p>

Terrance Brueck

Comment	Response
<p>7 - Climate Adaptation and Resilience</p>	
<p>The environmental impacts from wintertime conditions (due to more vehicle emissions with idling cars warming their occupants), as well as the pedestrian safety impacts have not been addressed at all in the previous or new EAW. Similar issues will undoubtedly be present in other adjacent or nearby streets to the arena site. Snow and ice mitigation around and near the arena site will also increase the use of road salt that impacts runoff to the Mississippi River environment. Snow conditions will also cause less availability of on-street parking, which will worsen the environmental impact of cars cruising the nearby neighborhood streets to find parking for arena events.</p>	<p>Thank you for your comment. The construction of the projects identified within the 2024 EAW Update will not change the City of St. Paul’s snow clearing frequency or protocols within the public roadways. The City of Saint Paul conducts snow removal operations as needed during winter months. This includes both snow emergency operations following major snow events as well as ongoing clearance from roadways and intersections as needed. Residents, businesses and institutional property owners are responsible for clearing snow for sidewalks in the ROW adjacent to their properties.</p>

Comment	Response
These seasonal variations will cause additional environmental impacts with snow and ice removal (added emissions of trucks, snowblowers,etc), as well as the salt runoff of snow melt to the river bluff and river gorge.	Thank you for your comment.
20 - Transportation	
I live on Summit Avenue across from the arena site and witness the current safety hazards on Mississippi River Boulevard (MRB) on Saturday football game days. Parked cars on MRB between Summit and Cretin Avenues required traffic going north on MRB to cross the yellow lines into oncoming traffic. This requires cars to swerve into the bike lane on the river-side of MRB in order to pass each other. The result is no room for cyclists in either direction without halting traffic flow or causing deadly collisions! Even without bicycle riders on the road, other large vehicles, trucks and buses cause traffic gridlock and/or collisions. The risk to human life is also significant with people (attending the games) getting into and out of parked vehicles with the restricted traffic lanes.	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The project involves no proposed changes to the existing roadway widths or locations of public parking. • Parking on Mississippi River Boulevard (MRB) is permitted Monday through Friday from 8am-8pm, so event users are not expected to utilize this parking during weeknight or Friday night events. Weekend events are generally accommodated within campus except for approximately 1 event per year. • A cursory review of the MnDOT’s Crash Mapping Analysis Tool (MnCMAT) indicates that there have been no reported crashes in this location over the last ten years.
The impact of the arena on this currently known safety hazard will be no different or worse! The arena is just as close to this traffic congestion area as the football stadium, meaning parked cars for arena events will cause similar or worse outcomes. With wintertime snow conditions of curb pileups causing even more restrictions on road traffic lanes, the impact on vehicle traffic and pedestrian safety will be more extreme!	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • During events several mitigation strategies will be implemented to improve pedestrian safety such as traffic control officers along Cretin Avenue and designated pedestrian routes through the use of barricades, cones, and wayfinding signage. In addition, multiple infrastructure improvements near the Arena are expected to enhance pedestrian safety, such as a new signal at Cretin Avenue/Grand Avenue, pedestrian widening along Grand Avenue, and curb extensions at Cretin Avenue/Goodrich Avenue. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP. • City snow management policy calls for plowing to the curblines, and allows for the imposition of one-sided parking bans where snow accumulations across a season begin to impinge on roadways.
No traffic management plan will lessen the desire to drop off event attendees and drive around nearby streets in search of parking spots.	Thank you for your comment.
UST football parking on MRB last Saturday.... [Two photographs of cars parked along Mississippi River Boulevard were provided]	Thank you for your comment.

John Cavanaugh

Comment	Response
<p>After reading through the amended EAW, I do not see any further concern over the issues raised by ARD for the following reasons:</p> <ol style="list-style-type: none"> 1. Air Pollution caused by increased car traffic: the MPCA has a standard of how much traffic results in significant air pollution and the proposed traffic does not rise to the level of concern. 2. Environmental concerns: the building is working toward LEED Silver Certification like its newest dormitory and will not impugn the environment. 3. Attendance figures: Much concern was raised about the arena's capacity and the parking issues to accommodate any crowd that meets full capacity. The university has made plans for that. The basketball arena will hold around 5,000. In the last two years, the current Schoenecker gymnasium has not reached maximum capacity of 1,800 and the possibility of reaching the proposed capacity of 5,000 may only occur a few times and UST has made arrangements to handle that occasion if it arises. The projected attendance for hockey (4,000) is below the number of fans that attend the university's football games and there has been no opposition to those numbers. The Summit League is spread across the Midwest and game rivalries do not exist to the extent that will be a regular likelihood. <p>I believe the ARD's complaints are rooted in NYMBYism and they have been throwing any concern opposed to the construction in their lawsuit in an attempt to find something that will stick. I believe the amended EAW addresses all the concerns adequately.</p>	<p>Thank you for your comment.</p>

Joel Clemmer

Comment	Response
20 - Transportation	
<p>Just looking at traffic considerations alone reveals numerous inadequacies. UST:</p> <ul style="list-style-type: none"> •has not considered traffic from the new Schoenecker performance space; •has not considered daily use of other new buildings on South Campus nor other development in the area, such as Highland Bridge; •has never produced the promised Event Traffic Management Plan yet refers to it as a mitigation; •provides no prevention nor mitigation for the admitted 505 parking space shortage for maximum capacity arena events other than 	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • As mentioned on Pages 2-5 of the 2024 EAW Update Transportation Analysis Addendum, the Schoenecker Center and Microgrid projects are expected to have minimal impacts to campus traffic and parking, especially during event times. Guidance/recommendations have been provided for Schoenecker Center performance hall event scheduling. • As noted on Page 29 of the 2023 EAW Transportation Study, Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development." • An event management plan (EMP) is a requirement of the EAW. EMPs are typically completed after project approvals, but before the first event. An EMP will take into account event schedules and other specific details that impact logistical planning. Not all such details are available at the time of environmental review.

Comment	Response
<p>parking in our neighborhood;</p> <ul style="list-style-type: none"> • vaguely points to an off-site parking capability in reference to the above, in spite of no such capability having been developed after two years. 	<ul style="list-style-type: none"> • Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community. • UST has had preliminary discussions with Allianz Field to utilize their parking lot for shuttle services, which has sufficient available parking to accommodate the anticipated deficits. Currently, parking and shuttle services are expected to be provided at no cost to event patrons. However, parking pricing is expected to be discussed/refined in collaboration with stakeholders as part of the event management plan. Specific details on service times, bus types, and shuttle frequencies will be finalized and outlined as part of the EMP.

Flannery Delaney

Comment	Response
<p>There is so much to say about why the EAW is inadequate and so many reasons that an EIS should be required of this project. I know you will get a lot of thoughtful feedback that will consider the inadequacies of the EAW with detail to back this up. I am just going to say too big, wrong location, not enough parking. We are Pleading with you to reconsider what this arena will do to our neighborhood. As neighbors with UST we are asking for a compromise that strikes a balance with a healthy, vibrant neighborhood and D1 athletics. Please pause the construction until an EIS is completed so that we can all be confident that the carbon emissions, traffic, Mississippi River, and the neighborhood were considered. What does the city have to lose by requiring an EIS?</p>	<p>Thank you for your comment.</p>

John and Virginia Dell

Comment	Response
<p>Living directly across from the arena, a major concern is the use of toxic refrigerants for the cooling system and the large ice rinks. The Current EAW does not adequately address the refrigerant and possible spills or leaks from the miles of piping for ethylene glycol to keep the rinks frozen (No PCA-approved safeguards). The other refrigerant is not identified so one questions how the environmental assessment can be done without specifying the chemical that will be used.</p>	<p>Thank you for your comment. Section 13.c, starting on page 37, lists the approximate number of chemicals/materials expected in the Arena and measures to avoid, minimize, and mitigate adverse effects of the materials.</p>
<p>The current analysis is for parking for basketball and hockey only, Analysis does not include concerts conventions or other arena uses. An EAW is needed to include the full extent of UST's usage throughout the year. Parking, traffic, pollution have all been under estimated.</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance</p>

	of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.
--	--

John Dittberner

Comment	Response
<p>I believe the revised EAW for the new UST arena in St. Paul still falls short of satisfying the best interest of the residents of the city and skirts the intent of requiring an EAW in the first place. It is heavily and unreasonably skewed in favor of UST, and the changes are generally reworded vagaries from the original EAW with very little meaningful or substantive change. The mitigation measures suggested are not adequate nor is there any mechanism for accountability against UST if the EAW fails to reasonably assess (sic) all potential impacts.</p> <p>I believe construction should be suspended until an adequate EAW is developed and executed. The burden of inadequate foresight regarding the EAW will be borne by the residents of the adjoining areas and the taxpayers of St. Paul, not by UST or its patrons.</p>	<p>Thank you for your comment.</p>

Julia Dittberner

Comment	Response
<p>I have grave concerns about moving forward with construction on the UST Arena without completing an environmental study. I fear if we wait much longer even if the study comes back against proceeding with the arena as planned UST will have come so far on construction that demolition/revision will cause greater negative impact than halting/amending construction. Thus, the study will become moot. It seems delay falls in favor of UST proceeding with construction so time is of the essence in determining the environmental impact of this arena.</p>	<p>Thank you for your comment.</p>

Lynette Erickson-Sikora

Comment	Response
6 - Project Description	
<p>By order from the Court the Environmental Assessment Worksheet for the St. Thomas Multiuse Arena was determined to be a stepped development, based on the yet incomplete Schoenecker Center at the time the Anderson Arena was already underway. Since groundbreaking at the arena site other simultaneous south campus projects were announced by UST. The scope of the stepped development must now include a Microgrid project expansion to Owens Hall and a new Seminary parking lot. These are not reflected in the EAW though planning for them was underway before the revived 2024 EAW was</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The 2024 EAW Update analyzes the Arena project as well as other nearby developments, including the constructed Schoenecker Center, the proposed addition to Owens Science Hall that will house the Center for Microgrid Research (Microgrid Project), and the proposed SPS Parking Lot; see pages 5-7 of the 2024 EAW Update for a description of each project. Multiple sections of the 2024 EAW Update was updated accordingly to address components of each project. • St. Thomas is not planning a replacement for Cretin Hall.

Comment	Response
<p>drafted. The revised EAW does not include a replacement for the demolished Cretin Hall, though its removal was part of the arena project. It does not include plans for what is now the Binz Refectory or for a new Welcome Center for the Seminary. UST's master plan should be a guide for what needs to be included in the stepped development.</p>	<ul style="list-style-type: none"> • St. Thomas has no board-approved plans for future changes to the Binz Refectory, except that certain temporary uses of that building will move to the Arena when the Arena is completed. The possibility of changes to the Binz drive is noted in Section 21 of the EAW update. Should removal of the Goodrich Avenue service drive be required, it will have minimal cumulative impacts with modifications made to anticipated service and emergency vehicle access and is not expected to have any other environmental impacts. • The Seminary is a neighboring land owner; the City and St. Thomas are not aware of any site plan proposal by the Seminary for a welcome center.
<p>The Schoenecker Center has a gallery and performance spaces. Both the Schoenecker Center and the Microgrid expansion allow for growth of faculty and student populations, and represent a significant new presence on the south campus. The Court of Appeals required new EAW to address all parts of this stepped development. Because UST continues to plan, replace, build and expand on the south campus, all planned developments should be considered in the stepped development. The EAW does not discuss UST's and the Seminary's future plans for the south campus. And it is known that UST's plans include the replacement of Brady Education Center, Binz Refectory and Grace Hall, effectively rebuilding the entire south campus. Besides a new surface lot the Seminary plans a Welcome Center facing the Mississippi River Boulevard. These works-in-progress should all be part of this EAW as phases in a stepped development.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • As noted in Section 21.b of the 2024 EAW Update, the University of St. Thomas does not have any board approved plans for new building construction at the St. Paul campus, other than the Owens Science Hall addition for the Microgrid Project, which is addressed throughout the 2024 EAW Update. While future development of the University is indicated by historic and forecasted trends, there is not sufficiently detailed information about any other future building projects to contribute to the understanding of cumulative potential effects. • The SPS Parking Lot project has received conditional site plan approval and is analyzed in the 2024 EAW Update. There is not sufficiently detailed information about any other future building project by the St. Paul Seminary, a neighboring landowner, to analyze in the 2024 EAW Update.
<p>The EAW states Arena events will occur in evenings and will therefore not conflict with peak class periods. However, students live on campus. There is no basis for assumption that students will leave campus after classes and not remain for study sessions, research, library use, social gatherings, etc. The EAW also notes that the Schoenecker Center includes "an art gallery, and choral and instrumental rehearsal and performance spaces" all of which would be utilized primarily in the evening. Use and impacts of the Schoenecker Center must be included in the EAW as part of a stepped development per the Minnesota Court of Appeals ruling.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Parking data indicates that parking in visitor lots and on-street parking immediately adjacent to campus (not restricted) is 35-45 percent more available in the weekday evenings than during the peak class periods. • As mentioned on Page 2-5 of the 2024 EAW Update Transportation Analysis Addendum, the Schoenecker Center and Microgrid projects are expected to have minimal impacts to campus traffic and parking, especially during event times. Guidance/recommendations have been provided for Schoenecker Center performance hall event scheduling.
<p>7 - Climate Adaptation and Resilience</p>	

Comment	Response
<p>The EAW says, "the site is susceptible to extreme heat" and a dense concentration of roads, parking lots, and buildings "can significantly raise air temperature and overall extreme heat vulnerability." Yet the EAW does not address what effect this dense concentration of paved surfaces and buildings will have on the environment. We must now include the footprint and paved areas around Schoenecker Center, the newly paved areas at the Seminary and the 59-space parking lot (as reported in MyVillager October 1, 2024) being built for the Seminary in the stepped development and all climate calculations.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Page 7 provides a summary of the SPS Parking Lot project and correct parking spaces anticipated for that project. • Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect.
<p>The 2024 update to the EAW says that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect," but UST is eliminating 66 mature trees, and is piping stormwater, which would naturally refresh the soil, into the river. Neither mitigates the heat island effect. There is no mention of the dozens of trees that will be lost when the Seminary lot is paved, nor does it mention the high water table on the Seminary lot site that keeps surface soil so wet year-round that it squishes underfoot and barely supports the growth of grass. The net loss of the many mature trees cannot be offset with a few young seedlings, nor can any new trees be planting in a manner that will shade the newly asphalt-paved areas. A total of 193 will be removed for the Anderson Arena, Schoenecker Center, Microgrid expansion, and Seminary parking. 127 will be replanted, although not necessarily on south campus.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Table 5 on page 17 lists 8 mature trees expected to be removed with the SPS Parking Lot project. • Page 30 provides a summary of the groundwater depths near the SPS Parking Lot project, which allows for infiltration of the parking lot runoff. • The 127 proposed trees listed in Table 5 are all proposed to be planted within UST's South Campus parcel or within the SPS property.
<p>12 - Water Resources</p>	
<p>The high water table noted in the EAW does not address the displaced ground water flowing toward the river, or where is it displaced to, with the addition of each new structure placed on the south campus. For example, the swampy conditions on the plot of land identified for the Seminary parking lot did not exist prior to the construction of the Schoenecker Center. It does not mention where water from the DNR-mapped natural spring near the arena has been diverted to. Only surface runoff has been addressed. A complete hydrology study must be done when considering the campus-wide scope of the stepped development.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The linear aquatic feature, referred to as the Grotto, is outside of the project construction limits (i.e. the "project site" in the 2024 EAW Update Figures) and will not be diverted. See Figure 7. • Stormwater surface runoff upstream of the Grotto will be collected and treated before discharging to the Grotto, improving upon the stormwater runoff quality from existing conditions. This is further described on pages 32-33 of the 2024 EAW Update. • The majority of the building will sit above the existing bedrock elevation, therefore avoiding the perched groundwater layer that sits atop the bedrock. The portion of the Arena that extends into the bedrock will be replaced with well-draining sands to allow perched groundwater to flow more easily along its intended path, both to lower groundwater levels and toward the Mississippi River. Groundwater is further described on page 25 of the 2024 EAW Update.

Comment	Response
	<ul style="list-style-type: none"> Subgrade building structure on South Campus is reduced by 40% with the removal of the three existing structures and the construction of the Arena project, thus allowing groundwater to flow more freely towards the Grotto.
<p>The EAW claims "There are no surface waters located within the project site." However, this must now be considered a stepped development which includes the entire south campus. The stream in the grotto is surface water. It will be surrounded by paving and subject to surface runoff. Increased runoff in the grotto creates a greater potential for erosion. Primary flow will be fed through a drainpipe rather than infiltrating over and through soils to support vegetation and wildlife and prevent surface erosion. Erosion in the grotto endangers the Mississippi River Boulevard bridge over the grotto.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The linear aquatic feature, referred to as the Grotto, is outside of the project construction limits (i.e. the "project site" in the 2024 EAW Update Figures) and will not be diverted. See Figure 7. The 11.7 acres of area that is analyzed within the 2024 EAW Update is not all of UST's South Campus parcel nor all of the Seminary's parcel; it is the area impacted during construction of the collective projects. See Figures 2-9. Stormwater runoff rate to the Grotto is decreased from existing conditions, as required through the City of St. Paul and Capitol Region Watershed District's stormwater management regulations. This is discussed in Section 12.b.ii of the 2024 EAW Update starting on page 32.
<p>14 - Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources</p>	
<p>Only the south campus is in the Important Bird Area and the Mississippi River Corridor Critical Area, so elimination of trees here and planting them elsewhere on a UST campus poses a serious impact on an ecologically fragile site. The effect of this loss of habitat has not been studied. The city should not accept any environmental review that does not analyze the effect of this habitat loss of 193 trees on migratory and non-migratory species.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As noted in Section 14 of the 2024 EAW Update (page 44), Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW. The Mississippi River Corridor Critical Area is discussed in Section 10 and Section 16. The project site provides minimal wildlife habitat due to the extent of impervious surfaces and low coverage of natural vegetation. No impacts to fish, wildlife, plant communities, rare features, or ecosystems are anticipated due to the lack of suitable wildlife habitat as discussed on page 42 of the 2024 EAW Update.
<p>Noted as of "special concern" are the Kentucky Coffee and Swamp White Oak trees onsite yet no mitigation for them is planned.</p>	<p>Thank you for your comment. Kentucky Coffee and Swamp White Oak trees are proposed to be planted as a part of the proposed projects. For example, 1 Kentucky Coffee tree and 1 Swamp White Oak tree are proposed to be removed within the project site (as listed in Table 8), but 2 Kentucky Coffee trees and 4 Swamp White Oaks are proposed to be planted as a part of the Arena project alone.</p>
<p>Though a net gain of suitable habitat for wildlife is claimed on page 17 of the EAW only 0.3 acre of permeable ground will exist on the arena site. Hardly an invitation to wildlife.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> Table 4 on page 17 lists 0.1 acres of constructed permeable pavements. This is not the only permeable ground (greenspace, planting areas, etc.), it is just the only green infrastructure practice provided through permeable pavers along the west edge of the SPS Parking Lot project.

Comment	Response
	<ul style="list-style-type: none"> Table 3 on page 17 shows that 3.5 acres of lawn/landscaping will remain after construction of each project analyzed within the 2024 EAW Update.
18 - Greenhouse Gas (GHG) Emissions/Carbon Footprint	
<p>The Minnesota Court of Appeals ordered a revised EAW to address all impacts of the arena project as a phase of a stepped development. But the Anderson Arena, Schoenecker Center, Microgrid expansion o to Owens Hall, and Seminary parking lot were not included in analysis of GHG emissions, particularly as it relates to commuting vehicles.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> Table 12 Proposed Operational Emissions on page 50 shows proposed operational emissions for the Arena, Microgrid Project, and Schoenecker Center. The SPS Parking Lot project was not included in the GHG emissions as it does not have a building component to the project, thus not producing operational emissions. Vehicle GHG emissions were included in the 2024 EAW Update starting on page 51. The Schoenecker Center, Microgrid Project, and SPS Parking Lot projects were not included in the vehicle GHG emissions analysis as those projects are all to address space deficits for existing programs/functions within the UST and SPS properties, therefore not increasing the number of vehicles coming to and from the project site. Said another way, if those projects weren't constructed, the programs would still be occurring in other spaces on campus and bringing the same amount of vehicles to campus.
20 - Transportation	
<p>When viewed as a stepped development, the huge net loss of parking on the UST south campus becomes clear. The Anderson Arena eliminated 247 spaces. The Schoenecker Center eliminated 118 spaces. None of these spaces have been replaced. The Seminary lot will add 59 new spaces but there is no mention of how many parking spaces will be used by Seminarians, despite the fact that these new spaces figure into UST's arena parking strategy. The EAW also states that with the Seminarians no longer need to park in the Anderson Ramp which will free up 73 spaces. The math does not work if they are adding 59. In any case, Seminary usage was not called out in 2023 EAW; UST did not disclose that the Seminary was using available visitor spaces, further limiting UST's ability to provide parking for the arena. Without an actual count of how many Seminary vehicles use the UST lots, it is speculation to say that the new Seminary lot will free up space in UST lots; the Seminary does not have other indoor and outdoor parking facilities.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The SPS Parking Lot project is proposing to construct 73 surface parking stalls as described in Section 6 of the 2024 EAW Update on page 7. Seminary parking was discussed within the 2023 EAW Transportation Study. "Table 4. Parking Demand of Impacted Lots" on Page 16 provides a detailed overview of the School of Divinity (SOD) Parking, while Page 26 (Table 12) outlines that the available event parking supply "Includes parking supply adjustments to account for parking loss caused by the arena footprint."

Comment	Response
<p>On-street parking utilization was not collected for the 2024 EAW Transportation Analysis Update Addendum. The effects of the Schoenecker Center on street parking cannot be analyzed without collecting on-street parking utilization. The Court of Appeals required that the effects of the Schoenecker Center be studied as a stepped development, but Schoenecker was not open at the time the 2023 on-street parking counts were conducted. No updated study has been done.</p> <p>Available campus parking at UST is a significant enough issue that it needs to be counted, verified and analyzed by an independent party, not subject to the distortions put forth by UST.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As outlined on Page 2 of the 2024 EAW Update Transportation Analysis Addendum, technical guidance only provides data linking enrollment or school population to vehicular trips and parking demand on college campuses. Therefore, enrollment at the UST St. Paul campus was the focus for assessing traffic and parking operations of the Schoenecker Center and Microgrid projects, rather than changes in building square footage. Enrollment in courses physically held on the St. Paul campus has been largely consistent over the last three (3) years, therefore, the two projects were anticipated to have minimal impacts on event parking/operations at the proposed arena. To validate this technical guidance with actual data, readily available parking utilization data collected by UST was used. UST collects week-long parking utilization data each fall and spring, and a comparison of this data indicated that available parking supply actually increased by approximately 3% during weekday evenings (6 pm) after the Schoenecker Center opening, when event traffic is expected to arrive, thereby confirming the validity of the technical guidance. Given the technical guidance and its verification through both enrollment data and available parking data, it was not deemed necessary to collect new on-street parking counts immediately adjacent to campus. In addition, the on-street parking adjacent to campus, shown as purple lines in Figure 1, had only 9 % (35 spaces) available during the weekday midday peak and 23% (84 spaces) available during weekday evenings (6 pm), indicating that these spaces were already heavily utilized with little additional capacity available.
<p>Level of Service traffic analysis in the Revised EAW is incomplete. It has not been updated to include other aspects of the stepped development. The Revised EAW uses the same study as used in 2023 EAW. Because the EAW has not been updated, it does not reflect (a) the added traffic caused by the opening of the Schoenecker Center; (b) the added traffic from the continued development of Highland Bridge; and (c) the dramatically increased attendance due to UST moving from the CCHA to NCHC conference. (d) Nor does it in any way demonstrate winter (hockey and basketball) season road and parking conditions. The city cannot accept an EAW based on an analysis that no longer applies. An EIS is required.</p> <p>Traffic Level of Service (LOS) was not considered for neighborhood residential streets and has not been updated to include the stepped development. At peak events, Goodrich and Cretin rated as LOS A/C, would go to F for Goodrich caused by cruising cars seeking a space. The Traffic Study does not account for cars driving up and down, seeking</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The event operations shown on Figures 3-6 of the 2024 EAW Update Transportation Analysis Addendum were updated from the operations published within the 2023 EAW Transportation Study and took into account various project changes such as the APF skyway removal. See below for responses to comments provided about the analysis: (a) Pages 2-5 of the 2024 EAW Update Transportation Analysis Addendum discuss how the Schoenecker Center and Microgrid projects are expected to have minimal impacts to campus traffic and parking, especially during event times. Guidance/recommendations have been provided for Schoenecker Center performance hall event scheduling. (b) Traffic generated by the Highland Bridge development was accounted for, as noted on Page 29 of the 2023 EAW Transportation Study. (c) The men's hockey attendance changes expected from the move from the CCHA to the NCHC are documented on Pages 11-12 of the 2024 EAW Update Transportation Analysis Addendum. However, it should be noted that the traffic

Comment	Response
<p>parking; a car that looks for parking on three streets will triple its impact.</p>	<p>operation analysis is based on a maximum capacity basketball game (5,500), to represent a worst-case scenario, not a hockey game, which has lower attendance capacities (4,000).</p> <ul style="list-style-type: none"> • (d) Based on industry standard, the traffic modeling does not account for snow events and/or emergencies. Snow events and/or emergencies could impact traffic operations and on-street parking. Much like Saint Paul residents need to react to snow emergencies and plan for parking differently than their normal practices, the University would need to plan for those events as well. • The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. • As mentioned on Pages 9 of the 2023 EAW Transportation Study, in urban areas it is common for intersections to operate at LOS E or LOS F for short periods of time. Event congestion is expected to occur for 20-30 minutes before and after an event.
<p>UST claims no incompatibility with nearby land uses. As a result, the EAW specifically states that no measures are incorporated into the project to mitigate any incompatibility or any risk potential. An EIS is needed to study the scope of the stepped development that now encompasses most of the UST south campus. The arena will have spill-over effects that conflict substantially with the adjacent residential uses. UST acknowledges that the traffic and parking will not be limited to the campus itself, but will affect mobility and parking in the surrounding residential community. Addressing the risk potential would include addressing an analysis on emergency vehicle access both pre and post events.</p>	<p>Thank you for your comment. The project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. The project site is located in SPPD Fire District One, with the nearest stations being Station 14 (Snelling Avenue near Marshall), Station 20 (Vandalia and University), and Station 19 in (Edgecumbe Road). All stations house EMT teams in addition to fire apparatus. This is in addition to ambulance services associated with hospitals/health care systems in Saint Paul. The proposed site is located in the Western Patrol District of SPPD. All first responders generally use major routes to reach a service/call site and have signal priority where needed.</p>
<p>The EAW says no mitigation is needed for 2,499 visitors to the arena (50% capacity). Even excluding day-to-day scholastic uses of the south campus and new uses at the Schoenecker Center. UST does not have a surplus of parking to use. Those 2,499 people will have to park somewhere, and UST does not have the spaces. Again, an EAW reflecting a stepped development needs to look at the impacts of all development with a cold eye, not just the minimized assumptions put forth by UST.</p>	<p>Thank you for your comment. The event parking demand analysis is documented on Pages 14-16 of the 2024 EAW Update Transportation Analysis Addendum. As mentioned previously, parking on campus is much more available during the evenings than during peak class periods.</p>

Comment	Response
<p>The Court of Appeals specifically called out two major flaws in the 2023 EAW. One was that the arena should be considered as part of a stepped development. This was not accomplished in the Revised EAW. The other was the utter lack of a mitigation plan. Part of arena event mitigation is an Event Traffic Management Plan (ETMP). A complete Event Traffic Management Plan is required to be developed on consultation with St. Paul PED and Public Works Departments. A thorough ETMP should have been developed and incorporated into the EAW so that its environmental effects can be considered. It would be arbitrary and capricious for the city to accept an EAW without analyzing the environmental effects of an ETMP. The revised EAW fails on both counts cited by the Court of Appeals. It needs to be corrected with a comprehensive Environmental Impact Statement.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The Schoenecker Center, Microgrid Project, and SPS Parking Lot projects and their impacts to traffic and parking are documented on Pages 1-7 of the 2024 EAW Update Transportation Analysis Addendum. • Table 10 of the 2024 EAW Update Transportation Analysis Addendum summarizes all mitigation strategies and improvements that UST has committed to, have been required through the Site Plan Approval, or that have been recommended as part of the EAW process. The required mitigation is outlined in the Findings of Fact document when a determination is made on the need for an EIS. Table 10 is expected to be updated as part of the event management plan to link specific mitigation measures to corresponding attendance levels at which they would be needed/required.

Jean Haley

Comment	Response
<p>I am writing in support of requiring a full Environmental Impact Statement for the arena currently under construction at the University of St. Thomas.</p> <p>I am deeply concerned about the environmental impact of building such a facility at this location when we are in the midst of a devastating climate crisis.. As you know, this summer we experienced higher than normal temperatures and a drought. The hottest summer on record in MN was in 2021. As climate scientists tell us, rising temperatures and drought will only get worse in the future.</p> <p>To quote the EAW ""the site is susceptible to 'extreme heat' and a dense concentration of roads, parking lots, and buildings 'can significantly raise air temperature and overall extreme heat vulnerability'". The 2024 update to the EAW says that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect", but UST is eliminating 66 trees net, and simply piping stormwater into the river.</p> <p>Building an arena at a location encircled by pavement and almost entirely dependent on cars for transportation -- even with adequate parking -- is a health hazard to the neighbors, staff and students at St. Thomas, and wildlife. It is an egregious example of climate catastrophe denial in the service of status and money.</p> <p>Please protect the health of those who will be directly affected by this building and help save, rather than destroy, the plane by requiring a full Environmental Impact Statement.</p>	<p>Thank you for your comment. Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect</p>

Virginia Housum

Comment	Response
<p>On the morning of November 4, 2024, I was driving north on Cretin Avenue from Ford Parkway. I was struck by a sign on that corner which said "not a truck route." Since I was following a large dump truck which proved to be headed to the St. Thomas campus and there were two other large dump trucks headed south, I considered the template represented by the sign: a city rule widely ignored, just as the normal rules governing the University of St. Thomas' multiuse arena on the university's south campus have been ignored by the city of Saint Paul. I submit these comments on the second and amended environmental assessment worksheet ("EAW") in frustration and incomprehension of the city's apparent determination to to benefit an institution which uses an exorbitant amount of city resources and yet pays no taxes, or even a small payment in lieu of taxes. I hope my cynicism about this process is mistaken. I am confident that in future years the city and UST both will regret the approval of an EAW which enables a decision to permit the Arena to be built as proposed on the south campus. I submit these comments as a neighbor who will be immediately affected by the Arena to be built on the south campus of the University of Saint Thomas ("UST").</p>	<p>Thank you for your comment.</p>
<p>Preliminarily, this EAW was not the subject of a single public meeting at which comments would be solicited, notwithstanding promises by city staff that the review of this amended and restated EAW would be a "full process" with public meetings to present it. The city's first EAW was rejected by the Minnesota Court of Appeals, and the city embarks again on a failed process with procedural flaws which exacerbate the problems in the review process for the previous EAW. I note that when I tried to contact city planning staff suggesting various mechanisms for the city to obtain input from its neighbors to see if a compromise could be reached, not only was the suggestion rejected, but the city attorney's office told a lawyer representing a nonprofit to tell me not to contact city staff again. [See attachment 1 to this comment.] The Arena proposal could have been improved with neighborhood input.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>The new EAW again fails to meet the statutory standards for mitigation addressed by the Court of Appeals, which found such efforts must be "specific, targeted, and certain." In fact, the Court of Appeals found that the city's failure was "arbitrary and capricious," a stunning rejection of the management of the process by a municipality. Courts rarely found municipal actions arbitrary and capricious. But the city's failure was understandable, since UST cannot even predict how many events it will host per year at the Arena. The city should have told UST to figure out all the intended uses of the Arena, and then the city would consider the EAW. Although the EAW noted that "[i]t is anticipated that the Arena will host other university events such as commencement ceremonies, academic convocations, speakers, and career fairs [EAW, page iii], the EAW does not identify how many such events are anticipated, much less certain to occur, and the EAW is totally silent on the extent UST intends to rent out the Arena for other non-university events. Given the lack of information about the intended usage of the Arena, the EAW is inherently flawed in analyzing the environmental effects of such usage. In the following section of this comment, I have made suggestions for steps the city and UST should undertake to seek to mitigate the damage which can be expected from the Arena, but note that this steps likely would themselves be inadequate if UST uses the Arena to an extent exceeding the uses specifically referenced in the EAW, as seems likely.</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>

Comment	Response
<p>In light of the Minnesota statutory requirement for mitigation which is "specific, targeted, and certain," which must be met BEFORE the EAW can be approved and must last far longer than the two year monitoring window previously suggested by the city, it is essential that there be far more specificity about the realistic plans for mitigation of harm. Since the EAW no longer contains a section on mitigation, it is clear that UST has decided that since it cannot meet the requirements set by the Court of Appeals, it will simply try to bury the issue. In the absence of any attention to specific, targeted, and certain mitigation, here are several ideas for meaningful mitigation measures which could actually reduce the environmental damage which will be caused by the Arena.</p> <p>1. Eliminate the merge lane on southbound Cretin Avenue between Grand Avenue and Goodrich Avenue. At Grand Avenue, Cretin Avenue has a right turn lane to enter the south campus of UST. South of that intersection, Cretin Avenue has a "merge lane" for vehicles which intend to continue going south on Cretin Avenue. The effect of the merge lane is to encourage cars to speed in a race course-like fashion, to insure they can continue proceeding south on Cretin Avenue. By the time vehicles reach Goodrich Avenue, many are traveling at 40 miles per hour, and are unwilling, or perhaps unable, to stop for the crosswalk at Goodrich and Cretin. Cretin Avenue is not 1-94, or even Highway 5, neither of which has pedestrian crossings. The merge lane is absolutely inconsistent with pedestrian and bicyclist safety on the cross streets south of the campus and should be permanently eliminated.</p> <p>2. Build bumpouts on Cretin Avenue for all cross streets between Lincoln Avenue and Randolph Avenue. Speeding drivers make Cretin Avenue exceedingly dangerous for pedestrians, bicyclists, and other users of the streets. To mitigate the increased traffic caused by the Arena, additional steps are needed to make street crossings safe. The city has proposed bumpouts at Goodrich Avenue, but pedestrians cross at many other streets south of Goodrich. Only Jefferson Avenue has an appropriate pedestrian activated signal to slow drivers. Jefferson Avenue is too far south of the northern traffic signal at St. Clair, and the traffic signal at St. Clair (currently inactive) is too far south to compel vehicles to slow at the crosswalks between Grand Avenue and St. Clair Avenue.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The City of St. Paul as the RGU is tasked with identifying mitigation measures before an EAW is complete to address any issues that were identified within the analysis. The contracts with rideshare, transit, and shuttle services would be completed as an outcome of the environmental review and before the Arena is operational, not before the EAW is complete. The mitigation measures will be implemented and enforced through the issuance of a Certificate of Occupancy by the City. • Pages 17-20 and Table 10 of the 2024 EAW Update Transportation Analysis Addendum summarizes all mitigation strategies and improvements that UST has committed to, have been required through the Site Plan Approval, or that have been recommended as part of the EAW process. The required mitigation is outlined in the Findings of Fact document when a determination is made on the need for an EIS. The mitigation measures outlined in the Findings of Fact document have been determined to be the most beneficial to offset the potential impacts of the Arena project. • The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm) and is only expected to last for 20-30 minutes before and after the event. • Pedestrian strategies and improvements were recommended at locations with the highest likelihood of usage during event periods. These improvements include but are not limited to a new traffic signal and pedestrian improvements at Cretin Avenue/Grand Avenue, traffic control officers along Cretin Avenue (depending on the event size), and pedestrian bump outs at the Cretin Avenue/Goodrich Avenue intersection. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP.

Comment	Response
<p>3. Add a pedestrian activated signal (like the one at Jefferson Avenue and Cretin) at the intersection of Goodrich and Cretin. Many pedestrians and bicyclists cross Cretin Avenue at Goodrich, because it is one of the few streets which allows direct access to the Mississippi River and the trails along East Mississippi River Road. That intersection will experience even greater usage as guests of the university try to reach the Arena, especially in light of the growth in attendance at UST, evidenced by the public announcement by UST which appears below at the section of this comment on page 9, at comment number 16. A pedestrian activated sign is a plausible mechanism to assist pedestrians seeking to cross Cretin Avenue, even though it will not be a full proof safety measure.</p> <p>4. Demand increased bus service in the area. Although UST promise to work with MetroTransit on improved transit services, the results of its efforts in the last two years is that the neighborhood in fact has lost bus service during the exact time when UST ostensibly was meeting with MetroTransit about improving transit service, and notwithstanding the growth in student enrollment. The 21D bus, which used to travel south from Marshall Avenue to Summit and Finn has been cancelled. The popular route 87, which formerly served Cretin Avenue going north to Roseville, now runs only on Cleveland Avenue. Bus route 74, which used to run on St. Clair Avenue, no longer runs there. The effect of UST's efforts at improving mass transit have failed miserably to date. This fact shows that no confidence can be placed in UST's efforts at "specific, targeted, and certain" mitigation. For this reason alone, the EAW fails on this test, just as the previous EAW failed.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Pedestrian strategies and improvements were recommended at locations with the highest likelihood of usage during event periods. These improvements include but are not limited to a new traffic signal and pedestrian improvements at Cretin Avenue/Grand Avenue, traffic control officers along Cretin Avenue (depending on the event size), and pedestrian bump outs at the Cretin Avenue/Goodrich Avenue intersection. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP. • Transit Service options are analyzed on page 54 of the 2024 EAW Update. Bus route 74 was not included in this analysis as it was not considered to run in the vicinity of the Arena. Free transit passes are a recommended mitigation measure and the estimated impact on parking demand is modest (10-30 vehicles). UST will continue to advocate for improved transit options but will plan for event management based on current circumstances. • Route 21 will be largely replaced by the METRO B line, a new bus rapid transit (BRT) route providing faster and more reliable service along Lake Street, Marshall Avenue, and Selby Avenue. Although the new service, expected to begin in June 2025, will not include a stop at the Cretin Avenue/Summit Avenue intersection, it will be in close proximity to campus and can serve as a connection point to other routes, such as Routes 63 and 87. • It is important to note that UST does not have control over Metro Transit routes and services. These are primarily determined by a combination of factors, with demand and ridership being a significant driver.

Comment	Response
<p>1. The EAW suffers greatly by its continuing limitation of analysis to the 6 acre site where the Arena will be built. The EAW could be made meaningful by a serious review of the effects of the Arena on its surroundings. But even looking at the wider south campus, rather than simply the Arena site, the EAW demonstrates serious and unacceptable environmental damage. At pages 16 through 18, UST documents the destruction of 193 trees on the site for the construction of the Arena. No effort has been made to calculate the loss of carbon sequestration from those trees, nor the temperature and heating consequences from the loss of shade. In terms of efforts to mitigate the harm to the south campus alone, and on the neighborhood, UST now shockingly admits that it does not intend to replace a single tree on the south campus! Any new trees will be planted on the north campus. In previous iterations of the Arena story, prior to commencement of construction, UST informed the community at public meetings that approximately 75 trees on the site would be replaced in the vicinity of the Arena, but they would be young, small trees for years to come. Adding insult to its illusory promise, UST said it would use acorns and seeds from the mature trees willfully destroyed. As disclosed in the EAW, UST intends to destroy a sensitive ecological area close to the river, and then add trees at a great distance from the river. In this way, UST is damaging the Mississippi River flyway, which is a federal crime, and hurting the many thousands of birds who are dependent on the bluff site for survival. The city must require UST to agree in writing to replace the trees which will be destroyed, on a ratio of at least 4: 1 to compensate for the loss of the air filtration and carbon sequestration trees provide. Further, the new trees should be planted on the south campus, where the greatest damage from the new Arena is going to occur.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The 2024 EAW Update analyzes the 11.7 acres listed in Table 1. • The 127 proposed trees listed in Table 5 are all proposed to be planted within UST’s South Campus parcel or within the SPS property.
<p>2. UST is in violation of its contractual obligations under its existing conditional use permit (the "CUP"), which constitutes a contract between UST and the city, which is enforceable by the city. The Arena is being built to be 75 feet high, far in excess of the height limit set out in the applicable zoning ordinances, which limit height on the site to 40 feet. As a result of violating the CUP, UST can no longer claim the benefits of the greater height provisions set out in the CUP, and must be held to building no higher than 40 feet on the site. The EAW cannot be accepted in order to permit the Arena to be built as proposed, because it exceeds the 40 foot height limit.</p>	<p>Thank you for your comment. The structure height(s) are described in Table 1 on page 8 of the 2024 EAW Update, along with a definition of how building height is calculated within the City of St. Paul Zoning Code (see footnote on page 8 of the EAW). Compliance with the height and setback requirements are described on pages 23-25 of the 2024 EAW Update and have been addressed in the Site Plan Approval process. The building height and restrictions in the CUP control, as described in the second paragraph on page 25.</p>

Comment	Response
<p>3. On pages 23 and 24 of the EAW, UST represents that the Arena will be compatible with nearby land uses. This is completely untrue. In fact, the neighborhood is almost entirely composed of single family homes, with a few duplexes in the mix. It is a residential neighborhood. The construction of a massive sports arena in a single family neighborhood is unprecedented in the Twin Cities. The arena could have been constructed without disruption to family neighborhoods in another location, in particular, the site west of the Target store on Hamline and University Avenues. The EAW fails in failing to assess the better, less disruptive locations on which the Arena should be built.</p>	<p>Thank you for your comment. The project site is currently zoned H2 Residential zoning district, as well as the RC-3 River Corridor overlay district. The H2 district allows residential uses as well as some civic and institutional uses. Colleges, universities, and seminaries are allowed in the H2 district subject to a conditional use permit, which defines campus boundaries and regulates building height and setback requirements, among other things. The University of St. Thomas ("St. Thomas") has operated under conditional use permits for over three (3) decades.</p>
<p>4. The massive amount of additional paved surface area will increase runoff into the grotto and the Mississippi River, and it is likely the water will be contaminated by the chemicals used to make ice at the Arena. The river provides drinking water to millions of people (including the entire population of the City of Saint Paul), and supports an aquatic environment for countless fish and other animals, including endangered turtles. Residents of the city expect the city government to act as a steward of the river. By approving the EAW and this Arena, the city will have thrown its support behind forces for polluting and damaging the Mississippi River, one of the most important environments on the continent. This action cannot be tolerated by an electorate committed to preventing adverse climate impacts.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Stormwater runoff rate to the Grotto is decreased from existing conditions, as required through the City of St. Paul and Capitol Region Watershed District's stormwater management regulations. This is discussed in Section 12.b.ii of the 2024 EAW Update starting on page 32. • Section 13.c of the 2024 EAW Update, starting on page 37, discusses the measures to avoid, minimize, and mitigate adverse effects of the chemicals used within the Arena building.
<p>5. Activities at UST have generated countless noise complaints resulting from athletic events and practices on the campus. The EAW fails to address the consequences of the use of external speakers and other sound amplification systems. So far, UST has chosen to treat even minor athletic events like they are monster truck rallies, resulting in excessive noise which can be heard as far away as the intersection of Prior and Goodrich Avenues. This issue must be studied in order for the EAW to satisfy its statutory purpose.</p>	<p>Thank you for your comment. Noise impacts are analyzed on pages 34-35 of the 2024 EAW Update. It should be noted that while some athletic events on campus are held in outdoor venues, such as football, soccer, baseball, softball, and track and field; the Arena is an indoor venue. Any external amplified sound would be required to be consistent with the noise ordinances of the City and if UST intends to exceed those noise ordinances, they will be required to seek additional sound permits accordingly.</p>
<p>20 - Transportation</p>	
<p>Even without pedestrian accidents and consideration of construction disruptions, the Arena project is going to have a very significant deleterious effect on traffic along Cretin Avenue, especially at the intersections with Goodrich, Fairmount, Princeton, and Sargent Avenues, north of St Clair. The defects in the EAW I have identified in the discussion of traffic implications of the arena include the following:</p> <p>1. The EAW includes no improvement in its analysis or revised traffic counts from the failed effort made in the earlier version of the EAW. It is fatally flawed in failing to consider the future growth in traffic on Cretin Avenue from the continuing buildout of the Highland Bridge development as</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • As noted on Page 29 of the 2023 EAW Transportation Study, Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development." • Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the arena, including projected attendance numbers and event frequencies. Most events and

Comment	Response
<p>cumulative with the additional pressure from the Arena. The number of events at the Arena remains uncertain, and is not addressed in the EAW. Therefore, the growth in traffic on Cretin Avenue and other streets in the area is inadequate. Traffic calming is already desperately needed. With attendees at games in the winter at night, the need becomes much more urgent.</p>	<p>activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>
<p>2. The EAW does not even consider the traffic impact on Marshall Avenue from the Arena, despite the fact that traffic is often backed up on Marshall Avenue.</p>	<p>Thank you for your comment. The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. Note that Cretin Avenue/Marshall Avenue was a study intersection, and event signal timing plans are expected to be developed and implemented at the intersection as part of the event management plan.</p>
<p>3. On street parking utilization data was not collected for the most recent EAW. If it had been, it would have found increasing numbers of cars parked on nearby residential streets. Parking is not per se a problem on public streets, but increased parking which is already occurring implies that before and during events at the Arena, there will be cars on the nearby residential streets searching for parking. This will mean an unacceptable amount of greenhouse gas ("GHG") emissions from cars left running while drivers search for parking spaces.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Parking counts on and immediately adjacent to the UST campus, as shown in Figure 1 within the 2024 EAW update Transportation Analysis Addendum, served as the foundation for the EAW parking analysis, based on the scope developed in collaboration with UST and City staff. • Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community.
<p>4. I personally have contacted UST about team buses left running for hours at a time along Goodrich Avenue at all hours of the day and night. On occasion, I have confronted bus drivers. In response, UST has told me that it is legal for team buses to be left running while the drivers are in them, although it has not cited any authority for this proposition. Nowhere in the EAW are the effects of particulates and GHG unnecessarily allowed in the neighborhood from this source explained or accounted for.</p>	<p>Thank you for your comment. St. Thomas provides a Visitor's Guide to all visiting athletic teams. The Visitor's Guide provides directions for where the visiting team must be dropped off and where the visiting team bus must park on campus during the event. Whether to use that bus parking location or travel off campus to eat/rest is at the discretion of the visiting team bus driver. However, providing a location for the bus to park on campus and a location within a UST building for the driver to wait during an event will help prevent an idling bus from parking illegally in the neighborhood and lower vehicle emissions.</p>
<p>5. On page 56, the EAW states that events with parking deficits of over 100 cars are only expected to occur up to three times a year. When UST cannot say how many events will occur from the Arena being leased for non-university events, this is a misrepresentation, as UST has no basis for projecting how many events with large parking deficits can be anticipated. Prudent analysis means that the city must evaluate the EAW assuming a far</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often</p>

Comment	Response
<p>greater number of events and parking deficits than UST projects, so the city can plan accordingly for dealing with problems being created.</p>	<p>limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>
<p>6. The traffic signal configuration at Grand Avenue and Cretin for access to the Arena disclosed in the EAW will endanger pedestrians. Further, it will result in a requirement for all non-arena traffic to have to stop for extended periods. There is only one block north of Grand before the double traffic light on Summit and Cretin; as a result traffic on Summit Avenue will likely be blocked frequently, and east-west traffic will come to a complete standstill. Many drivers will use alternative routes on Mississippi River Boulevard or Cleveland Avenue to avoid the traffic jams. In addition to creating a traffic nightmare, this scenario also will result in more GHG in the immediate area. Of even greater importance, it appears UST has only considered solutions to access problems for attendees at events at the Arena. The city must analyze the EAW in the interest of all citizens of Saint Paul. It cannot allow itself to be a partner to UST in solving the traffic problems created for visitors from other parts of the metro area coming to UST events. The city must address problems being created for the average Saint Paul resident who is not attending an event at the Arena, but simply trying to go about his or her normal daily affairs.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The proposed signal reconstruction at the Cretin/Grand intersection is simply to replace the mast arms for the traffic lights and add additional signal heads. The intersection itself will not be reconfigured, apart from making pedestrian ramp improvements to ensure accessible pedestrian crossings are provided. • Depending on the event size, a combination of event signal timing plans and traffic control officers will be implemented to safely cross pedestrians and minimize delays for non-event traffic at the intersection.
<p>7. On page 59 of the EAW, UST says it will produce a traffic management plan "designed to minimize transportation impacts and enhance safety and efficiency during events." UST has had two years to develop its traffic management plan, and has not yet made even a proposal. The reason for this is obvious: the traffic and transportation problems which will be created by the Arena whenever it is in use are not susceptible to resolution. Perhaps they can be partially mitigated, but there is no explanation for why the city would approve an EAW which cannot and does not solve the problems to be created. The city should not tolerate another intractable problem in the neighborhood in order to accommodate an entity which is an excessive user of city services and provides literally no financial or other benefit to the city.</p>	<p>Thank you for your comment. An event management plan (EMP) is a requirement of the EAW. EMPs are typically completed after project approvals, but before the first event. An EMP will take into account event schedules and other specific details that impact logistical planning. Not all such details are available at the time of environmental review.</p>
<p>8. The EAW itself states that a normal traffic study should provide for a 15% margin to accommodate unanticipated issues which arise, but never explains how any of the actions UST may take will address the need for a 15% margin of flexibility.</p>	<p>Thank you for your comment. See Page 7 of the 2024 EAW Update Transportation Analysis Addendum for clarification of a statement made in the 2023 EAW Transportation Analysis.</p>

Comment	Response
<p>9. On page 60, the EAW indicates that UST will schedule "no park" days on campus. But UST does not control the surrounding streets. "No park" days on campus will simply mean more cruising in the neighborhoods for parking spaces.</p>	<p>Thank you for your comment. As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, St. Thomas will pair the time-of-day restrictions with early communication and clear notification to its internal staff, faculty, and commuting students prior to enforcing the event parking restrictions. This system is currently used for large events. St. Thomas will proactively work with faculty and the registrar to schedule online classes as necessary to reduce the number of vehicles coming to campus, to ensure the ramp clearing strategy is effective. Student residents with full time parking permits will not be displaced to avoid spillover to the neighborhood.</p>
<p>10. In the analysis of parking needs, the EAW never considers the needs of residents. It should take into account the likelihood of residents wanting to have birthday parties for children, celebrations of other family milestones, or a simple family holiday. From the point of view of UST, inherently but unacceptably endorsed by the EAW, the needs of everyone else who lives in the vicinity must give way to the desire of UST to have fans attend games without inconvenience.</p>	<p>Thank you for your comment.</p>
<p>11. Although on page 60 of the EAW, UST dangles the possibility of providing shuttles for game attendees from other local establishments, this is totally unrealistic. For one thing, the site plan for the Arena does not provide pickup and drop off sites for these shuttles, or even for Uber or Lyft drivers. For another, there is already a history of buses sitting and idling illegally on neighborhood streets. The city traffic enforcement office isn't operative in the evenings or on weekends when games often will be played. So even if neighbors try to assist in enforcement of existing parking restrictions, there is no mechanism by which parking restrictions can be enforced. The EAW fails to address how these problems will be addressed.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Space for shuttle drop off is provided along the west side of the Arena with space for approximately 10 shuttles. Uber/Lyft drop off will be finalized through the EMP process and discussed as a part of the rideshare incentive agreements. • St. Thomas provides a Visitor's Guide to all visiting athletic teams. The Visitor's Guide provides directions for where the visiting team must be dropped off and where the visiting team bus must park on campus during the event. Whether to use that bus parking location or travel off campus to eat/rest is at the discretion of the visiting team bus driver. However, providing a location for the bus to park on campus and a location within a UST building for the driver to wait during an event will help prevent an idling bus from parking illegally in the neighborhood and lower vehicle emissions.
<p>12. On pages 62 and 63 of the EAW, UST acknowledges that it may be forced to close the driveway at the Binz Refectory. Somehow, UST seems to think that it should accept the benefits of the CUP it holds at the same time that it refuses to comply with its contractual obligation to perform its agreements under the CUP. The EAW is inadequate because it should address directly the inability of UST to continue to use the driveway at the Binz Refectory.</p>	<p>Thank you for your comment. The possibility of changes to the Binz drive is noted in Section 21 of the EAW update. In May 2024, a complaint was filed with the City alleging that St. Thomas violated the CUP by not closing the service drive when certain remodel work occurred in the Binz Refectory in 2022 and 2023, and the matter has been scheduled for a hearing before the City's Planning Commission to determine next steps. The Planning Commission will determine whether the drive should be closed or the CUP should be modified, and enforcement has been stayed until such determination is made. Should removal of the Goodrich Avenue service drive be required, it will have minimal cumulative impacts with modifications made</p>

Comment	Response
	to anticipated service and emergency vehicle access and is not expected to have any other environmental impacts.
<p>13. In Appendix C, the EAW's analysis of GHG does not take into account vehicles owned and used by students, and uses the same minimal numbers of vehicle trips and overstates passengers per vehicle in order to back into a conclusion that the Arena does not create an unacceptable level of GHG. The city should not tolerate such shoddy work in determining whether the amount of GHG generated by use of the Arena (as opposed to its construction) is consistent with LU-54. The city should insist on insuring that the Arena does not produce excessive GHG in the city. But the EAW fails to meet even minimum standards for such an analysis, because the result of a serious study would show that the Arena will produce unacceptable deleterious effects on the health of its residents.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The GHG Vehicle Emissions Analysis was completed to document the change in vehicle emissions for spectator travel to the new Arena per the Court of Appeals Opinion. • St. Thomas currently plays hockey in Mendota Heights. The students attending hockey games in Mendota Heights would have a further distance to travel from the St. Thomas campus to Mendota Heights than they would walking to the new Arena which is located on campus. There would actually be a net decrease in travel distance for students attending the new Arena on campus than the travel distance of attending events in Mendota Heights. To be conservative, that decrease was not deducted from the vehicle miles traveled within the spreadsheet. • St. Thomas currently plays basketball on their St. Paul campus within another building. Therefore, there is no change in vehicle travel for students attending the new Arena vs the other building. • All non-student seats were incorporated into the Appendix C calculations without deducting the modal split assumptions (people who will take alternative means of transportation such as bus, walking, biking, etc.) listed in Table 10 on Page 24 of the 2023 Transportation Study to provide a conservative calculation.
<p>14. In Appendix D-1, the EAW should state the number of people who will be coming to the Schoenecker Center for practice space and performances, and the consequences of those events must be aggregated with the reported results of the analysis of the Arena on a stand alone basis</p>	<p>Thank you for your comment. The Schoenecker Center performance hall is discussed on Page 5 of the 2024 EAW Update Transportation Analysis Addendum. In addition, guidance/recommendations have been provided for performance hall event scheduling.</p>
<p>15. UST's "smart parking system" fails to address the obvious lack of data UST will suffer in attempting implementation. UST may be able to identify empty parking spaces in its lots and garages, but it has no control over the surrounding streets, and at best, will be directing drivers to cruise neighborhoods looking for legal areas for them to park. The astute reader of the EAW would assume that part of having a "smart parking system" will take into account the needs of neighbors, and that UST will support the expansion of permit parking sought by nearby residents to control street usage from the anticipated flood of people seeking parking after the lots and garages on campus are full. Even without the Arena being constructed and in use, there</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.

Comment	Response
<p>are serious illegal and dangerous parking practices occurring 1; it can only be expected that such occurrences will be more frequent in light of the growth in enrollment announced by UST, when added to the increase in visitors to the Arena.</p>	
<p>16. In Appendix D-2, the EAW contemplates a different understanding of "gradual expansion" in enrollment than is appropriate. It is impossible to square this representation with the following announcement by the university on November 4, 2024: (attachment of University of St. Thomas News release: "St. Thomas Celebrates Second-Largest Undergraduate Class in 20 Years").</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • In recent years, enrollment at St. Thomas dropped from a high of 10,245 total undergraduate and graduate students in 2015 to 9,061 in the Fall of 2022. This year, enrollment is 9,400 total students (6,300 undergraduate students and 3,140 graduate students). This includes students enrolled in classes in St. Paul, Minneapolis and online. • While this represents a slight increase in enrollment, there continues to be a change in the mix of students, the primary mode of their degree programs and the geographic location of their studies, resulting in negligible changes to the number of students attending classes on the St. Paul campus. • More students are attending classes online, including programs in data science and A.I. In addition, much of the program and enrollment growth St. Thomas is experiencing impacts students attending classes on the St. Thomas Minneapolis campus. • While St. Thomas estimates modest increases in overall enrollment, there will continue to be changes in the modes of delivery and slight increases in undergraduate enrollment are estimated to have a negligible impact on the St. Paul campus. • Because it is estimated that the vast majority of students attending games will walk to games, any projected increase in enrollment will have a negligible impact on event traffic and parking.
<p>The city and UST have both squandered an opportunity to improve the Arena and its environs by engaging UST's neighbors in developing creative solutions to the consequences of the decision to proceed with an oversize Arena on the south campus. UST should not be permitted to encumber the neighborhood unnecessarily, as it proposes. Throughout the EAW, UST minimizes the numerous detrimental impacts the Arena will have on the area, only some of which have been addressed in this comment. UST should convene a group of neighbors who will work with it to help it find meaningful mitigation opportunities.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>At some point in the recent past, the city abandoned its old slogan of being "the most livable city in America." If this EAW is approved, it will be clear that the old slogan no longer applies. By that decision, the city would make clear its indifference to the well being of its residents and protection of the environment.</p>	

James Johnson

Comment	Response
<p>20 - Transportation</p> <p>The projected congestion at the Cretin-Selby and Cretin-Goodrich intersections (a rating of F for the cross streets, even with mitigation: Table 14) is highly concerning. No mitigation plan is described for the Cretin-Selby intersection, which already is a big problem for pedestrians, including users of the route 63 bus line, which the EAW mentions as an access pathway to the proposed arena. Notably, most drivers on Cretin currently don't stop for pedestrians at that intersection, which has no painted crosswalks, despite the presence of bus stops on either side of Cretin.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As mentioned on Pages 9 of the 2023 EAW Transportation Study, in urban areas it is common for intersections to operate at LOS E or LOS F for short periods of time. Event congestion is only expected to occur for 20-30 minutes before and after an event. Given the Arena's location and alternative Route 63 bus stops closer to the venue, this intersection is not expected to experience significant pedestrian traffic during events. Most event patrons are expected to cross Cretin Avenue at Grand Avenue or Summit Avenue, where traffic signals are in place and traffic control officers will be stationed, depending on the event size. Pedestrian strategies and improvements were recommended at locations with the highest likelihood of usage during event periods. These improvements include but are not limited to a new traffic signal and pedestrian improvements at Cretin Avenue/Grand Avenue, traffic control officers along Cretin Avenue (depending on the event size), and pedestrian bump outs at the Cretin Avenue/Goodrich Avenue intersection. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP.
<p>Increased vehicle congestion up and down Cretin is anticipated, which is very bad, given that Cretin is already dangerously congested and fast. No increases should be tolerated. Vehicle throughput may even decrease in the not-too-distant future if the proposed 4-3 lane conversion occurs, as a traffic-calming measure to increase driver, pedestrian, and cyclist safety on</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-

Comment	Response
this dangerous, way-too-fast “stroad” (street-road). This was not considered in the EAW, but should be.	<p>6 pm), and is only expected to last for 20-30 minutes before and after the event.</p> <ul style="list-style-type: none"> Also stated on Page 29 of the 2023 EAW Transportation Study "On-street parking is assumed to be present along Cretin Avenue (as parking restrictions are generally lifted after 6 pm). Therefore, Cretin Avenue was modeled to have one lane of travel at the on-street parking locations." Therefore, Cretin Avenue would operate similarly to any potential 3-lane facility.
The anticipated need during some peak events for on-street parking in adjacent residential neighborhoods remains problematic, given the uncertain availability of such parking spots, especially in winter (snow blockage along curbs and in alleys) and if permit parking is enforced, which it should be to give local residents preferential access. Arena users searching for parking in nearby neighborhoods would create added congestion (with its associated hazards) on those side streets. The drivers likely would not be adequately alert for cyclists and pedestrians (including children), given their likely fixation on rapidly finding a parking spot, and would likely exceed the 20 mph speed limit, given that they’ve just turned off a high-speed “stroad”, where speeds often exceed 40 mph. The added engine and roadway noise, exhaust pollution, and headlight pollution from added vehicles circling around on residential streets must be considered in the EAW. It predictably will degrade the quality of life for residents, and pose some health risks.	Thank you for your comment. Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community.
Listing the route 87 bus as a third public transit option is a bit of a stretch, given how infrequently that bus runs on evenings and weekends. Few arena attendees are likely to find it useful for evening and weekend games.	Thank you for your comment. Although the route 87 bus stops are farther from the Arena and operate less frequently than routes 21 and 63, they could still be a convenient option for some users, depending on their origin or destination.
It is not clear that the projected number of events takes into account the likely future use of the arena by non-St. Thomas entities, e.g., area schools. This should be clarified, and the impact of such events on congestion and parking availability should be addressed.	Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies.

Linda Kane

Comment	Response
7 - Land Use	

Comment	Response
<p>The EAW specifically states that no measures were incorporated into the project to mitigate any incompatibility of adjacent land uses or any risk potential. We need an EIS to determine if the arena will have spill-over effects that conflict substantially with the adjacent residential uses. UST acknowledges that the traffic and parking will not be limited to the campus itself, but will affect mobility and parking in the surrounding residential community. Analysis addressing the risk potential of emergency vehicle access is also needed. The UST south campus and supporting street infrastructure are not adequate to support all the automobile and service vehicle needs of the arena and will put an unfortunate demand onto the neighboring residential streets.</p> <p>In the past 100 years, UST has undergone considerable development and expansion, which has increased dramatically in the last 50 years. It is anticipated there will be further development beyond the multi-use complex currently under review. Regardless of whether or not plans have been board approved, UST representatives have stated that the east and west blocks will soon be developed and that all athletic facilities will be upgraded to meet best practice standards for Division I athletics. The EAW is not sufficient in assessing the broad impact that UST has imposed on the surrounding community. The cumulative potential effects of UST development should be assessed in total, rather than in a project-by-project, piecemeal fashion. An Environmental Impact Statement (EIS) would be a more appropriate means of assessment.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state. The project site is located in SPPD Fire District One, with the nearest stations being Station 14 (Snelling Avenue near Marshall), Station 20 (Vandalia and University), and Station 19 in (Edgecumbe Road). All stations house EMT teams in addition to fire apparatus. This is in addition to ambulance services associated with hospitals/health care systems in Saint Paul. The proposed site is located in the Western Patrol District of SPPD. All first responders generally use major routes to reach a service/call site and have signal priority where needed. Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum show recommended mitigation measures. Required mitigation is included in the Findings of Fact document as a component of determination regarding the need for an EIS.
<p>15 - Historic Properties</p>	
<p>The EAW does not mention the Mississippi River Boulevard or Summit Avenue and the effects that UST development will have on them. Mississippi River Blvd. and Summit Ave. traffic will greatly increase, diminishing their use for recreation and historic presence. The maximum gross vehicle weight of trucks and buses will exceed the 9,000 lb. maximum established by the City Council for parkways in St. Paul. The site plan shows that trucks and buses entering from Cretin Avenue will exit on Summit Avenue; there is no turnaround location for all of the shuttle buses and visiting team buses that will discharge on the west side of the arena, so they will drive straight out to Summit Ave.</p>	<p>Thank you for your comment. The Cretin Ave service drive access point was added during the Site Plan Review process to reduce the service usage of the Summit Ave access point into the South Campus parcel. Service vehicles will enter and exit through the Cretin Ave service drive and will utilize the proposed parking lot south of the Arena to turnaround. Parking will be restricted during loading hours in order to allow those movements to occur.</p>

Comment	Response
<p>Violation and lack of respect to the terminus of Summit Avenue by using it for idling buses and exiting of service vehicles needs further review from the St. Paul HPC. In its previous review, the SPHPC was split on approval and needed the chair to act as tie-breaker. Additionally, the Summit Avenue Residential Preservation Association (SARPA) is opposed to the use of the existing driveway off of Summit Avenue for vehicle access to the arena. SARPA noted that the driveway is within the Summit Avenue West Historic District. Construction vehicles, large buses and delivery trucks that would use Summit to get to the arena could weigh as much as 20,000 pounds. SARPA would like arena traffic rerouted to Cretin Avenue.</p> <p>1) Summit Avenue is known for being the longest avenue of Victorian homes in the country, having a number of historic houses, churches, synagogues, and schools. The street is four and a half miles long and while other cities have similar streets, Summit Avenue is notable for having preserved its historic character and mix of buildings. It has been described as "the best preserved example of the Victorian monumental residential boulevard." [2]</p> <p>2) Summit Avenue is part of two National Historic Districts and two City of Saint Paul Heritage Preservation Districts and was named one of 10 "great streets" nationally by the American Planning Association in 2008. [7]</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The City of St. Paul Heritage Preservation Commission (HPC) reviewed and approved the 40' of Arena structure that crosses into the Summit Avenue West Heritage Preservation District on November 9, 2023. Traffic is not subject to review by the HPC. • The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave.
<p>20 - Transportation</p> <p>The projected seated attendance of 5,500 for Basketball and 4,000 for Hockey do not include standing room, participants, referees, food service, custodial, security, box office/ticket takers, medical, trainers or other users of the building, including a second hockey rink.</p> <p>Additionally, the parking demands need to analyze the overlap of other campus events – especially the overlap of the football, hockey & basketball seasons. Per the UST athletics website: 2024 football game schedule: August 29 – November 23 2024/25 Hockey game schedule: October 5 – March 1 2024/25 Basketball game schedule: November 4 – March 5</p> <p>These schedules do not account for the additional overlap if UST has post-season tournament play with the potential for a football and hockey or basketball game at the same time.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • As mentioned on Page 15 of the 2024 EAW Update Transportation Analysis Addendum "As previously assumed, there is expected to be sufficient parking in separate commuter/staff lots to accommodate UST players, coaches, and event vendors/staff, therefore, they were not included in the parking demand analysis". Additionally, these users are expected to arrive and depart outside of event peak hours. • The auxiliary ice sheet will not be utilized in well attended events within the main Arena sheet of ice, therefore the maximum vehicles/game is represented within the GHG Vehicle Emissions Analysis. • The maximum attendances for hockey and basketball that were analyzed in the 2024 EAW Update are intended maximum spectator attendances. St. Thomas will not sell standing room tickets that cause spectator attendance to exceed those thresholds. • The 2024 EAW Update Transportation Analysis Addendum acknowledged that simultaneous events at the Schoenecker Center Performance Hall alongside larger events at the Arena are expected to further increase congestion and potential parking deficits on campus, and recommended to avoid scheduling other on-campus events in any space on campus that

Comment	Response
	<p>would attract non-student/staff visitors who require on-site parking during events held at the Arena with attendance of 2,100 or greater. The 2024 EAW Update Transportation Analysis Addendum properly analyzed the impact of concurrent events on campus and established an operational parameter at which such events should not be scheduled.</p>
<p>The City should reject the current EAW and require an Environmental Impact Statement which properly defines the project; identifies all of the negative potential environmental effects; and complies with Minnesota law. The June 2023 EAW fails to properly define the project; fails to appropriately consider connected actions and phased actions; improperly minimizes the cumulative potential effects of all elements for the University's South Campus Quadrangle and related construction. The parking and congestion analyses omit necessary information, and strongly suggest that the University's acknowledged parking shortage should be solved by forcing the neighborhood to bear the negative consequences of insufficient parking on campus.</p>	<p>Thank you for your comment.</p>

Riley and Sarah Kane

Comment	Response
<p>There are so many issues with the stadium here that are problematic (impact on the river, parking scarcity, trash, safety of pedestrians) but I will focus on one that is particularly concerning to us, and that is its impact on trees in the area. It seems like taking down so many healthy mature trees (especially in light of the ash borer infestation that has decimated our neighborhoods) is always countered by UST with, "well we'll be planting new trees." To equate saplings that could take well over a decade to reach decent growth is little consolation. I believe that UST needs to do a much better job of mitigating tree loss.</p>	<p>Thank you for your comment.</p>

Pete Keith

Comment	Response
---------	----------

<p>As a close neighbor, I am extremely concerned about the peripheral impact that this size of an arena will have on the neighborhood, particularly with parking. St. Thomas has made zero provisions to facilitate parking. In fact, they have reduced spaces, and in response the St. Paul Seminary is now further reducing green space, cutting down large trees in order to provide for their own parking! The solution is as plain as day--St. Thomas needs to add to their parking ramp. I've heard all the nonsense about how this "opens up the CUP" and is a can of worms. That is not my problem to solve, it is theirs. And it is absolutely solvable in short term. Then need to be good neighbors and try to live within their footprint. Add to the parking ramp, whatever the process needs to be.</p>	<p>Thank you for your comment. Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community.</p>
---	--

John Kingrey and Karen James

Comment	Response
<p>13 - Contamination/Hazardous Materials/Wastes</p>	
<p>The use "next-generation" refrigerants Anhydrous ammonia and Ethylene glycol are not "next-generation." The revised EAW does not address the dangers of using these toxins and the risk to the environment. Need EIS.</p>	<p>Thank you for your comment. Section 13.c, starting on page 37, lists the approximate number of chemicals/materials expected in the Arena and measures to avoid, minimize, and mitigate adverse effects of the materials.</p>
<p>14 - Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>The revised EAW references Important Bird Area but offers no protective measures regarding the height of building and expansive glass which will harm birds. The Mississippi flyway is one of the largest in the country.</p>	<p>Thank you for your comment. As noted in Section 14 of the 2024 EAW Update (page 44), Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW.</p>
<p>18 - Greenhouse Gas (GHG) Emissions/Carbon Footprint</p>	
<p>Idling cars do not appear to be counted because UST will use "smart parking system." UST does not have parking supply to provide "smart parking system." Moreover, idling cars are the primary producers of GHGs in the area around the arena due to the cycling of vehicles through the residential neighborhoods. The revised EAW does not include the impact of team and media buses at events.</p>	<p>Thank you for your comment. As discussed on page 7 of the 2024 EAW Update Transportation Analysis Addendum, UST plans to implement a smart parking system to reduce congestion and circulation. UST anticipates having the smart parking system installed prior to the Arena opening.</p>
<p>5500 BB/4000 Hockey seated attendance does not include: standing room, participants, referees, food service, custodial, security, box office/ticket takers, medical, trainers, other users of the building, including hockey rink. The EAW does not disclose seating capacity of the second hockey rink. Any analysis of GHG should include an assumption on the impact of these additional attendees.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As mentioned on Page 15 of the 2024 EAW Update Transportation Analysis Addendum "As previously assumed, there is expected to be sufficient parking in separate commuter/staff lots to accommodate UST players, coaches, and event vendors/staff, therefore, they were not included in the parking demand analysis". Additionally, these users are expected to arrive and depart outside of event peak hours. The auxiliary ice sheet will not be utilized in well attended events within the main Arena sheet of ice, therefore the maximum vehicles/game is represented within the GHG Vehicle Emissions Analysis.

Comment	Response
	<ul style="list-style-type: none"> St. Thomas will not sell standing room tickets that cause spectator attendance to exceed those thresholds.
20 - Transportation	
<p>Updated on-street parking utilization was not collected for the 2024 EAW Transportation Analysis Addendum. Effects of Schoenecker on on-street parking cannot be analyzed without collecting on-street parking utilization. The Court of Appeals required that the effects of Schoenecker be studied, but Schoenecker was not open at the time the 2023 on-street parking counts were conducted.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As outlined on Page 2 of the 2024 EAW Update Transportation Analysis Addendum, technical guidance only provides data linking enrollment or school population to vehicular trips and parking demand on college campuses. Therefore, enrollment at the UST St. Paul campus was the focus for assessing traffic and parking operations of the Schoenecker Center and Microgrid projects, rather than changes in building square footage. Enrollment in courses physically held on the St. Paul campus has been largely consistent over the last three (3) years, therefore, the two projects were anticipated to have minimal impacts on event parking/operations at the proposed Arena. To validate this technical guidance with actual data, readily available parking utilization data collected by UST was used. Note UST collects week-long parking utilization data each fall and spring, and a comparison of this data indicated that available parking actually increased by approximately 3% during weekday evenings (6 pm) after the Schoenecker Center opening, when event traffic is expected to arrive, thereby confirming the validity of the technical guidance. Given the technical guidance and its verification through both enrollment data and available parking data, it was not deemed necessary to collect new on-street parking counts immediately adjacent to campus. In addition, the on-street parking adjacent to campus, shown as purple lines in Figure 1, had only 9 % (35 spaces) available during the weekday midday peak and 23% (84 spaces) available during weekday evenings (6 pm), indicating that these spaces were already heavily utilized with little additional capacity available.
<p>On weekends, parking for 1,300 additional attendees will be available in the neighborhood. The revised EAW does not analyze the effects of parking in the neighborhood other than to say it will happen. It is our belief that the purpose of an EAW is to analyze the environmental effects, not just to say they will occur.</p>	<p>Thank you for your comment. The event parking demand analysis, based on event type and attendance, is presented on Pages 15 and 16 within the 2024 EAW Transportation Analysis Update Addendum. For events where a parking deficit is expected, several mitigation strategies are recommended to reduce on-street public parking in the neighborhood and are summarized on Pages 17-20.</p>
<p>Level of Service traffic analysis appears to be the same as in 2023 EAW. Because the EAW has not been updated, it does not reflect (a) the added traffic caused by the opening of Schoenecker Hall; (b) the added traffic from the continued development of Highland Bridge; (c) the new Microgrid building; and (d) other developments that may have</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The event operations shown on Figures 3-6 of the 2024 EAW Update Transportation Analysis Addendum were updated from the operations published within the 2023 EAW Transportation Study and took into account various project changes such as the APF skyway removal. See below for responses to comments provided about the analysis:

Comment	Response
<p>impacted traffic. The city should not accept an EAW based on an analysis that no longer applies.</p>	<ul style="list-style-type: none"> • (a & c) Pages 2-5 of the 2024 EAW Update Transportation Analysis Addendum discuss how the Schoenecker Center and Microgrid projects are expected to have minimal impacts to campus traffic and parking, especially during event times. Guidance/recommendations have been provided for Schoenecker Center performance hall event scheduling. • (b & d) General traffic background growth and traffic generated by the Highland Bridge development were accounted for, as noted on Page 29 of the 2023 EAW Transportation Study.
<p>Analysis is for parking for basketball and hockey only. The analysis does not include concerts, conventions. EAW is needed to include full extent of UST's usage throughout the year.</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>
<p>A new traffic signal at Cretin and Grand is identified as a mitigation measure. The signal has green turn-only lights for cars turning (1) northbound left from Cretin into arena; (2) eastbound left from arena to Cretin. Those signals will require conflicting traffic to stop, causing backups. Pedestrians will be routed to cross Cretin in conflict with left turn light from arena to northbound Cretin, meaning that all non-arena traffic will halt for extended periods. With only one block to back up to Summit Avenue, traffic on Summit will be unable to pass due to backup.</p>	<p>Thank you for your comment. Depending on the event size, a combination of event signal timing plans and traffic control officers will be implemented to safely cross pedestrians and minimize delays for non-event traffic at the intersection.</p>
<p>Apparently, there have been preliminary discussions with Metro Transit about free transit, as well as preliminary discussions with rideshare services about discounts. Currently, only one bus line comes to the arena area (which will be impacted by the traffic and pedestrian congestion). The site plan has no space for arena drop-off and pick-up. There should be more detail rather than simply a preliminary discussion.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Transit Service is analyzed at pages 54-55 of the 2024 EAW Update. • The preliminary discussions were focused on how to incentivize the use of alternative transportation options. Two other metro transit bus lines (21 or B-Line and 87) serve the area and could be utilized by event attendees. Detailed strategies and operational plans will be further developed and finalized as part of the event management plan (EMP).
<p>The sidewalk south of the UST greenhouse is less than 8 feet wide. Although UST is replacing this structure with a new Microgrid addition to Owens Hall, it is not widening this sidewalk to accommodate arena foot traffic. With thousands of pedestrians newly routed to this sidewalk together with the thousands that the 2023 already showed using this sidewalk, the backlog of pedestrians will back up onto Cretin Avenue, creating dangerous situations for pedestrians but also</p>	<p>Thank you for your comment. Pedestrian improvements are planned along Grand Avenue and at the Cretin Avenue/Grand Avenue intersection. The sidewalk on the north side of Grand Avenue will be widened from 8 feet to 13.5 feet as part of the Microgrid Project. Additionally, as part of the Cretin Avenue/Grand Avenue signal project, a signal cabinet will be relocated from the sidewalk, increasing the available pedestrian space. Extra sidewalk will also be constructed to allow for a wider pedestrian crossing on the west side of the intersection during events. Depending on the event size, a combination of event</p>

Comment	Response
<p>invalidating the assumptions made in describing traffic delays and LOS decreases caused by arena traffic.</p>	<p>signal timing plans and traffic control officers will be deployed to ensure safe pedestrian crossings while minimizing delays for non-event traffic at the intersection. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP.</p>
<p>Currently, UST has approximately 6,200-6,300 students on the St. Paul campus but "aims for gradual expansion going forward." EAW does not disclose the extent of its plan to increase undergraduate enrollment. For discussion purposes, assuming an increase in enrollment by 1,000, the environmental effects of traffic and parking analyses should be included. With UST not disclosing any increase in dorm spaces, it reasonable to assume that 1,000 more people (plus the faculty and staff to support that increase) will be commuting to campus daily or, in the alternative, residing in "private dormitories" that are being built in increasing frequency.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • In recent years, enrollment at St. Thomas dropped from a high of 10,245 total undergraduate and graduate students in 2015 to 9,061 in the Fall of 2022. This year, enrollment is 9,400 total students (6,300 undergraduate students and 3,140 graduate students). This includes students enrolled in classes in St. Paul, Minneapolis and online. • While this represents a slight increase in enrollment, there continues to be a change in the mix of students, the primary mode of their degree programs and the geographic location of their studies, resulting in negligible changes to the number of students attending classes on the St. Paul campus. • More students are attending classes online, including programs in data science and A.I. In addition, much of the program and enrollment growth St. Thomas is experiencing impacts students attending classes on the St. Thomas Minneapolis campus. • While St. Thomas estimates modest increases in overall enrollment, there will continue to be changes in the modes of delivery and slight increases in undergraduate enrollment are estimated to have a negligible impact on the St. Paul campus. • Because it is estimated that the vast majority of students attending games will walk to games, any projected increase in enrollment will have a negligible impact on event traffic and parking.

KSTP - Alex Jokich

Comment	Response
<p>The folks at St. Thomas shared all of the background on this project and the legal battle with neighbors – along with how the city's been involved, with the site plan approvals, environmental assessment worksheet, etc. I was hoping for a quick statement (and/or interview) from the city on this situation today. The courts seem to be saying the city's EAW was not sufficient. Do you have a response to that? And what is being done to address it? Where does this major project currently stand? Is it at risk of not being completed, despite construction already being underway?</p>	<p>Thank you for your comment. The Court of Appeals issued an Opinion requiring an updated EAW, which the 2024 EAW Update was created to address.</p>

Cynthia Levine

Comment	Response
<p>As a resident of the Kings Maplewood neighborhood of St. Paul I was shocked when I first learned of St. Thomas’s plan to build a hockey arena on its campus. I became horrified when I learned that the proposed arena would be directly on the edge of the Mississippi Watershed. Even before learning any of the factual information about why such a structure should absolutely NOT be sited in STU’s planned and proposed site, from a simple visual and global perspective, it appeared to me to be a horrendous idea.</p> <p>Now that it has become very clear that STU cares not for the planet or its neighbors, I am truly hoping that the city of St. Paul will do the right thing by holding STU accountable to following the same standards as all others in our fair city.</p>	<p>Thank you for your comment.</p>
<p>STU is violating the zoning for the River Corridor Urban Open Overlay! The CUP regarding height of building the on campus is 75’, yet the arena, in its proposed site, is within the RCUOO (items 23-24 in proposed EAW).</p>	<p>Thank you for your comment. The structure height(s) are described in Table 1 on page 8 of the 2024 EAW Update, along with a definition of how building height is calculated within the City of St. Paul Zoning Code (see footnote on page 8 of the EAW). Compliance with the height and setback requirements are described on pages 23-25 of the 2024 EAW Update and have been addressed in the Site Plan Approval process. The building height and restrictions in the CUP control, as described in the second paragraph on page 25.</p>
<p>Would any other entity receive approval from the city to build a facility that would store toxic refrigerants without having approval first from the MCPA (items 19)</p> <p>In addition to not seeking approval from MPCA before building the arena, STU also neglected to seek approval from the EPA for approval of housing toxic substance in the watershed of the Mississippi River. I would like to know how the planning committee of St.Paul is ok with such blatant disregard for our city and the waters that flow through it.</p>	<p>Thank you for your comment. MPCA approvals, along with many other permits and approvals required, are shown in Table 6 starting on page 18 of the 2024 EAW Update.</p>
<p>Lastly, the net loss of 66 mature trees in the Mississippi River Corridor Critical Area will be significant. STU proposes no mitigation plan for the detrimental effects that would certainly occur if plans continue (items 17-18).</p> <p>It is my most sincere hope that the city request STU address the multiple grave issues with the current EAW, as well as demand and EIS that takes into account the impact of the proposed arena will certainly have on the neighborhood and the environment as a whole.</p>	<p>Thank you for your comment.</p>

Diane Malfeld

Comment	Response
<p>I live near St Thomas University at 84 N Mississippi River Boulevard with my husband, Craig Currie. No parking is permitted along our part of the street, but we already are affected by increased traffic on and near Cretin. Traffic safety concerns have increased accordingly.</p> <p>My comments pertain to the lack of commitment on the part of St Thomas to mitigation efforts described in “Event Management Plan” and “Traffic Management/Safety”. Perhaps elsewhere in the EAW there are references to the City of St Paul monitoring, or UST self-monitoring and reporting its mitigation efforts and I missed them. If monitoring is not explicitly required, that is an important omission.</p> <p>Examples of vague, non- committal language are below:</p> <p>With respect to an Event Management Plan, UST is “planning to collaborate with city partners and actively engage neighborhood associations” A commitment to collaborate and actively engage would be more reassuring, especially when the use of terms like “collaborate” and “actively engage” leave plenty of wiggle room for UST as it is.</p> <p>Under Traffic Management/Safety, several event management recommendations are “proposed” and are “expected” to be updated.</p> <p>Of course, my comments assume that somehow UST can be held accountable subsequent to the opening of its facility for undertakings made by it in the course of obtaining necessary City approvals. On the assumption that there is recourse, there should be enforceable promises of tangible and meaningful mitigation plans with consequences for breach.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • An event management plan (EMP) is a requirement of the EAW and will incorporate various post-event monitoring and adjustments based on real-world experiences and feedback. The post-event monitoring tasks will include, but are not limited to, the following: • (1) Event signal timing plans will be developed and refined based on event operations at I-94/Cretin Avenue and along the Cretin Avenue corridor. • (2) Multiple events will be observed, and recommendations will be provided to improve event operations and safety. • (3) Attendance data will be tracked and compared to the attendance projections published within the EAW. • (4) An EMP working group will be established, and multiple meetings will be held to assess what aspects are working well and which need improvement. • These event monitoring tasks are consistent for events of this size. However, the additional monitoring events are expected to be reviewed and discussed with the project team. • Event management plans are living documents that are continually updated and refined based on real-world experiences and feedback. • The requirement for an EMP is a condition of the certificate of occupancy.

Miriam

Comment	Response
<p>The increase in traffic will create a major pedestrian safety issue for blocks around the Arena. Pedestrians, wheelchair users and cyclists will not be safe along Cretin Avenue, Mississippi River Boulevard, Summit Avenue and the west end of Grand Ave. Additionally, the pedestrian safety issue will be increased on the many smaller residential streets around the proposed new Arena. There is already an existing safety issue with the steady and heavy traffic increase from the nearby Highland Bridge site.</p> <p>Please note that not everyone is blessed with being spry and able-bodied. Not everyone is able to immediately assess and then instantaneously react</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm) and is only expected to last for 20-30 minutes before and after the event. • During events several mitigation strategies will be implemented to improve pedestrian safety such as traffic control officers along Cretin Avenue and designated pedestrian routes through the use of barricades, cones, and

Comment	Response
to oncoming traffic. Those with mobility impairments are particularly vulnerable.	wayfinding signage. In addition, multiple infrastructure improvements near the Arena are expected to enhance pedestrian safety, such as a new signal at Cretin Avenue/Grand Avenue, pedestrian widening along Grand Avenue, and curb extensions at Cretin Avenue/Goodrich Avenue. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP.

Kathryn Mitchell

Comment	Response
6 - Project Description	
Hockey attendance. The EAW projection of numbers does not include all of the many people who will be in attendance, including: medical and emergency staff, security personnel, custodial staff, referees, trainers, box office and ticket takers, vendors to name a few.	Thank you for your comment. As mentioned on Page 15 of the 2024 EAW Update Transportation Analysis Addendum "As previously assumed, there is expected to be sufficient parking in separate commuter/staff lots to accommodate UST players, coaches, and event vendors/staff, therefore, they were not included in the parking demand analysis". Additionally, these users are expected to arrive and depart outside of event peak hours.
7 - Climate Adaptation and Resilience	
Heat. There is no mitigation of the massive amount of ongoing Alheat that will be produced by this project. While the EAW talks of tree planting, there will actually be a net loss of 66 trees without replacement and storm water will be dumped into the Mississippi River!	Thank you for your comment. The Arena project is seeking a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the buildings and high-reflectance paving materials which helps to offset the heat island effect. Those material upgrades were chosen to be incorporated into the project by UST to offset the heat island effect among other benefits. Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect.
Alternative energy. While the EAW claims that it will use photovoltaic technology, wind and battery storage, there is actually nothing of the sort proposed for the arena.	Thank you for your comment. The 2023 EAW noted on-site photovoltaics as a consideration of the Arena to reduce the project's GHG emissions (page 33 of the 2023 EAW). This was removed for the 2024 EAW Update from the Arena scope, but still is a consideration for the Microgrid Project (page 15 of the 2024 EAW Update). The wind and battery storage are also considerations for the Microgrid Project, not the Arena project.
Snow removal. The EAW describes using the system in place to remove snow and ice. This means massive amounts of very damaging salt added to the Mississippi River.	Thank you for your comment. <ul style="list-style-type: none"> The snow and ice management system at the University of St. Thomas includes a multi-step process to reduce the use of chemicals for salting. This also includes periodic removal of salt in the winter months, annual removal of salt in the spring, and ground crew certification through the MPCA.

Comment	Response
	<ul style="list-style-type: none"> Comparing the 2020 Conditions Plan (before Schoenecker Center was built) and the 2025 Conditions Plan (after the proposed developments are built) found within Appendix A of the 2024 EAW Update, there is a net decrease in pavement and sidewalk area by over 20%, thus reducing the needs of salting within the project area.
Glycol. The use of this toxic substance is known to be harmful and the PCA has no approved safeguards.	Thank you for your comment. Section 13.c, starting on page 37, lists the approximate number of chemicals/materials expected in the Arena and measures to avoid, minimize, and mitigate adverse effects of the materials.
20 - Transportation	
Traffic congestion. Living just across the street on Summit from the new arena gives a bird's eye view of the many issues that are evident in this plan. While there are actual laws to prohibit large heavy truck and vehicles from using Summit Avenue, somehow St. Thomas has never been subject to these limits and this will only increase with considerable uptick in volume of activity going forward.	Thank you for your comment. The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave.

Dave O'Brien

Comment	Response
10 - Land Use	
St. Thomas is counting on leasing the arena for concerts and other commercial events. This does not comply with current St. Thomas zoning. St. Thomas has said there is no incompatibility with nearby land uses. Therefore, the EAW says there is no need for measures to be included in the project plan to deal with incompatibility or public risks. This simply is not true. There will be huge impacts on the larger community. An EIS needs to be done to address the shortcomings of the project.	Thank you for your comment.
20 - Transportation	
Since the core campus is in a residential neighborhood, there is no established throughfare for all the traffic. All the other Division 1 and professional sport venues in the Twin Cities are adjacent to throughfares. Cretin Ave. can't support the increased traffic volumes without compromising local access. In winter, with snow on the streets, there will be a sufficient slowdown to the point of it being a public safety issue. Emergency response vehicles won't be able to operate quickly enough.	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The Arena is only one-mile from I-94. Cretin Avenue is classified as a major collector and Cleveland Avenue is classified as a Minor Arterial. Event congestion is expected to occur for 20-30 minutes before and after an event. The project involves no proposed changes to the existing roadway widths or locations of public parking to constrain access for emergency vehicles. Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state.

	<ul style="list-style-type: none"> • City snow management policy calls for plowing to the curblineline, and allows for the imposition of one-sided parking bans where snow accumulations across a season begin to impinge on roadways.
<p>The St. Thomas plan is to wait until the arena is done, and traffic problems are happening, to devise a strategy to fix the problems. It will be too late then. The inevitable problems need to be identified and addressed before any events take place. If that doesn't happen, the city will end up with an unsolvable situation.</p> <p>There is no space for adequate parking. The local neighborhood streets will have parking bans. The current EAW has deliberately misrepresented what the parking needs will be by providing artificially low numbers of cars and low projections for the number of events at the arena. The events at the arena will present the city with regularly occurring parking disasters.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Table 10 of the 2024 EAW Update Transportation Analysis Addendum summarizes all mitigation strategies and improvements that UST has committed to, have been required through the Site Plan Approval, or that have been recommended as part of the EAW process. The required mitigation is outlined in the Findings of Fact document when a determination is made on the need for an EIS. These strategies will be refined and finalized as part of the Event Management Plan (EMP). The EMP is a living document that is continually updated and refined based on real-world experiences and feedback. • The event parking demand analysis was based on the modal split assumptions (Table 10 and Page 24 of the 2023 Transportation Study) discussed and confirmed with City staff. The attendance projections are data-driven, based on other Division 1 programs within UST's conference (or future conference for men's hockey), excluding the top and bottom capacity programs. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies.
<p>St. Thomas has talked about creating an Event Management Plan. But they have yet to come up with any realistic plan. This should be expected because there won't be any possible plan that would work. Given the restricted space situation, there is no way to accommodate 5,000+ event attendees. It will be a guaranteed and unacceptable failure.</p>	<p>Thank you for your comment. An event management plan (EMP) is a requirement of the EAW. EMPs are typically completed after project approvals, but before the first event. An EMP will take into account event schedules and other specific details that impact logistical planning. Not all such details are available at the time of environmental review.</p>

Tim Parke-Reimer

Comment	Response
<p>I live in the neighborhood just south of UST between Cretin and Cleveland Avenues. One of the qualities I value about this neighborhood is its walkability. The arena EAW does not adequately address how UST will handle the increased traffic to and from the arena, and it assumes that the additional parking needs will just get absorbed by the surrounding neighborhoods.</p> <p>I am appealing to you to ensure that the arena plan provides for additional parking so as not to increase traffic congestion in the surrounding neighborhoods as event attendees search for parking. I also am requesting that additional measures be made to ensure that pedestrians have safe ways to cross Cretin Avenue beyond the existing traffic lights at Grand Ave and St. Clair. Cretin Avenue is difficult to cross even now during busy traffic times, and I expect it will only get worse as traffic increases from both Highland Bridge and the arena.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The 2024 EAW Update provides numerous strategies that will be implemented to manage event traffic such as event signal timing updates, designated pedestrian routes, and traffic control officers along Cretin Ave. The event parking demand analysis, based on event type and attendance, is presented on Pages 15 and 16 within the 2024 EAW Update Transportation Analysis Addendum. For events where a parking deficit is expected, several mitigation strategies are recommended to reduce on-street public parking in the neighborhood and are summarized on Pages 17-20. The Arena is primarily an event venue and is anticipated to have little to no impact on traffic during day-to-day non-event conditions. Event traffic is expected to occur outside of the heavy commuter peak hours (i.e. 7-9 am, 4-6 pm), and is expected to last for 20-30 minutes before and after the event. Pedestrian strategies and improvements were recommended at locations with the highest likelihood of usage during event periods. These improvements include but are not limited to a new traffic signal and pedestrian improvements at Cretin Avenue/Grand Avenue, traffic control officers along Cretin Avenue (depending on the event size), and pedestrian bump outs at the Cretin Avenue/Goodrich Avenue intersection. Some of these strategies and improvements were required through the Site Plan Approval for the Arena project, others will be finalized in the EMP.

Bruce Pedalty

Comment	Response
<p>Hello. I am writing to you about my concerns regarding the arena that is under construction and the deleterious effect it will have on the environment and traffic in my neighborhood. St Thomas will soon be playing hockey in the NCHC conference. That conference includes last year's national champion, Denver, as well as teams from Duluth, St Cloud State, and North Dakota. I would expect that most games will be at or near capacity. The parking at the arena site is vastly inadequate, as are the access roads. The neighborhoods surrounding the University will be inundated with traffic, cars looking for parking, as almost all surrounding streets have no parking restrictions on weekends. There is also no lodging close to this area, almost all attendees will drivers.</p> <p>I support The ARD organization, and all the details they have unearthed about this flawed project and lack of proper environmental review and permitting. I</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The projected attendance changes expected as a result of the UST men's hockey team joining the NCHC is documented on Pages 11 and 12 of the 2024 EAW Update Transportation Analysis Addendum. For the purpose of the event parking demand analysis, all men's hockey games were assumed to be maximum capacity events. The event parking demand analysis, based on event type and attendance, is presented on Pages 15 and 16 within the 2024 EAW Update Transportation Analysis Addendum. For events where a parking deficit is expected, several mitigation strategies are recommended to reduce on-street public parking in the neighborhood and are summarized on Pages 17-20.

Comment	Response
ask that you delay the approval or consider restricting attendance to the levels that access streets and available parking can support.	

Kathryn Richtman

Comment	Response
7 - Climate Adaptation and Resilience	
<p>1. The Current EAW fails to provide sufficient mitigation efforts caused by the "Heat Island Effect" and removal of mature trees to existing habitat. Page 10 of the Current EAW states, "Surfaces and structures such as roads, parking lots, and buildings absorb and re-emit more heat from the sun than natural landscapes. This can significantly raise air temperature and overall extreme heat vulnerability in urban areas where there are dense concentrations of these surfaces. This is referred to as urban heat island effect. According to the Metropolitan Council's Extreme Heat Map Tool, based on the land surface temperature at the project site during a heatwave in 2016, the site is susceptible to extreme heat." However, the Current EAW fails to adequately address what effect this dense concentration of paved surfaces and buildings will have on the environment. Although it states, on page 12, that UST "has designed landscaping (via shade trees) and stormwater management systems to reduce stormwater runoff to mitigate for the urban heat island effect," UST will be eliminating, or has already eliminated, at least 193 mature trees. (See Table 5, page 17 of Current EAW). Planting 127 saplings in place of these 193 mature trees will have little impact on the heat island effect for many years. Moreover, there is no assurance that all the 127 saplings will be planted on the South Campus. Therefore, this measure is inadequate because it fails to address how UST will mitigate the heat island effect on the South Campus.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The City of Saint Paul advises on landscaping, including trees, during permitting approvals. Although there is no requirement that trees be replaced in the same location, the 127 proposed trees listed in Table 5 of the 2024 EAW Update are all proposed to be planted within UST's South Campus parcel or within the SPS property. Project design adaptations to mitigate for the urban heat island effect are described in Table 2 on page 12 of the 2024 EAW Update. The Arena project is seeking a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the buildings and high-reflectance paving materials which helps to offset the heat island effect. Those material upgrades were chosen to be incorporated into the project by UST to offset the heat island effect among other benefits.
12 - Water Resources	

Comment	Response
<p>3. The Current EAW does not properly address the potential for water pollution.</p> <p>Page 28 of the Current EAW states, "There are no surface waters located within the project site (see Figure 7). No trout streams or lakes, wildlife lakes, migratory waterfowl feeding and resting lakes, or outstanding resource value waters are located-within the project site or within one mile of the project site."</p> <p>This is an inaccurate statement, ignoring the fact that the project site is adjacent to the Grotto, which includes a stream that has an unrestricted flow into the Mississippi River. The adjacent Mississippi River provides drinking water to millions and supports fish and other aquatic species. Therefore, the Current EAW is incomplete as it fails to accurately and adequately address the potential for polluted water to flow directly. into the Grotto, the Mississippi River Gorge area and the Mississippi River itself.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As noted on page 29 of the 2024 EAW Update, a U.S. Geological Survey-mapped flowline feature from the National Hydrography Dataset (NHD) is located approximately 140 feet west of the project site, in alignment with the Grotto. The Grotto is a linear aquatic feature that conveys stormwater runoff from the impervious surfaces within the project site. The Grotto is outside of the project construction limits (i.e. the "project site" in the 2024 EAW Update Figures). See Figure 7. Page 32 of the 2024 EAW Update describes impervious surface runoff prior to construction and anticipated drainage towards the Grotto post-construction. As noted on page 33, the increase in impervious surfaces draining to the Grotto will now be treated per both water quality and runoff control requirements through underground filtration devices, thus improving the water quality and flow conditions.
<p>13 - Contamination/Hazardous Materials/Wastes</p>	

Comment	Response
<p>2. The Current EAW does not address the dangers of using toxic refrigerants in an Arena that is mere feet from the Mississippi River Gorge, ignoring significant environmental risks. Page 13 of the Current EAW states, "The following measures provide increased reliability and energy efficiency in the Arena to reduce emissions:</p> <ul style="list-style-type: none"> - Redundant chiller design and incorporation of glycol into supply loop for all cooling coils will protect from freezing conditions and ensure systems remain operational. - Chillers will use next-generation refrigerants with low global warming potential." <p>Page 38 of the Current EAW states, "The chilled water system for the building will have two chillers, one 500 ton and one 112 ton, located within the sub level mechanical room of the building. The 500 ton chiller will hold approximately 800 pounds of refrigerant, the 112 ton chiller will hold approximately 137 pounds of refrigerant, and the chilled water piping system will have approximately 4,000 gallons of a fluid that is 30% ethylene glycol and 70% water within the system piping. For the ice rink cooling system, there is anticipated to be approximately 1,200 pounds of ammonia and approximately 6,000 gallons of a fluid that is 40% glycol and 60% water. The project proposer will obtain the appropriate permits from the MPCA." The use of the refrigerants ethylene glycol and anhydrous ammonia are not "next-generation" refrigerants. They are toxic chemicals. According to experts, "Ethylene glycol is a clear, colorless syrupy liquid. The primary hazard is the threat to the environment. Immediate steps should be taken to limit its spread to the environment. Since it is a liquid it can easily penetrate the soil and contaminate groundwater and nearby streams" (emphasis added). Anhydrous ammonia is a toxic gas or liquid that, when concentrated, is corrosive to tissues upon contact. Exposure to ammonia in sufficient quantities can be fatal. The "proposed" location of the Arena lies within an especially fragile environmental habitat. The Arena would sit approximately 40 feet uphill from the area commonly referred to as "The Grotto," and drain directly into the Grotto area. (See pages 25-26 of Current EAW). The Grotto area includes a stream with an unrestricted flow directly into the Mississippi River. As quoted above, ethylene glycol is a liquid that "can easily penetrate the soil and contaminate groundwater and nearby streams." Thus, a spill of either or both of these substances presents a clear danger to the environment.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Section 13.c, starting on page 37, lists the approximate number of chemicals/materials expected in the Arena and measures to avoid, minimize, and mitigate adverse effects of the materials. • As noted on page 38 of the 2024 EAW Update: "St. Thomas will have an Ammonia Plant Safety Program which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. St. Thomas does employ trained professionals with experience in operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus."

Comment	Response
<p>"Low global warming potential," as stated on page 13 of the Current EAW, does not alleviate the need to examine other environmental risks associated with these toxic substances. Although the Current EAW states on page 38 that the "project proposer will obtain the appropriate permits from the MPCA," as it relates to the ice rink refrigerants, there are currently no such permits and no evidence that the Minnesota Pollution Control Agency will approve such permits.</p> <p>It has been over 16 months since the First EAW was approved by the City. Yet no explanation is given as to why the necessary permits from the MPCA have not been obtained. In fact, no such MPCA permit is even listed in Section 9 of the Current EAW. (See, Permits and Approvals Required Section, p. 17). The failure to obtain MPCA approval makes the Current EAW incomplete.</p> <p>In addition, page 49 of Current EAW states, "There will be safety plans in place to handle the ammonia use appropriately." This statement ignores the fact that the EAW is the document that, by law, is required to specifically state what those plans are so that a complete and accurate assessment of all risks to the environment can be made. UST's vague promise regarding future plans does not meet the standard of specificity, accurateness and completeness required of a valid EAW.</p> <p>The Current EAW fails to address the potential for serious damage to the environment, as well as significant harm to wildlife and human life. A spill or leakage of the toxic refrigerants needed to keep the ice rinks continually frozen would be catastrophic. Without a proper environmental plan approved by the MPCA, the Current EAW is not only incomplete; it is fatally flawed. Given the fragile environment of this location, an EIS is needed.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As noted on page 38 of the 2024 EAW Update: "St. Thomas will have an Ammonia Plant Safety Program which includes preventative maintenance and response protocols, training for operators of the systems, continuous monitoring, dedicated exhaust systems, and integration with the building alarm system. St. Thomas does employ trained professionals with experience in operating and maintaining ethylene glycol systems within their current heating and cooling systems on campus." The mechanical permit for the ice plant has been issued by the City of Saint Paul for the Arena project.
<p>14 - Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>In addition, removing 193 mature trees as part of the Arena, Schoenecker, Microgrid, and Seminary parking projects is detrimental to the birds who depend upon this habitat. Only UST's South Campus is in the Bird Area and the Mississippi River Corridor Critical Area. The elimination of 193 mature trees from this area is a serious loss to an ecologically fragile site. The effect of this loss of habitat on migratory and non-migratory bird species has not been studied. Therefore, the Current EAW is incomplete.</p>	<p>Thank you for your comment. As noted in Section 14 of the 2024 EAW Update, Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW.</p>

William Richtman

Comment	Response
<p>Section 7 - Climate Adaptation and Resilience</p>	

Comment	Response
<p>Does not answer the question of how it will adapt to the recognized heat island effect because it fails to acknowledge that it is adding to that effect by the removal of 1.6 acres of permeable surface including the removal of 193 mature trees (Table 5, page 17) which provided a cooling effect through evapotranspiration. There will be no net gain in mitigation of the heat island effect as claimed. This statement is incorrect and with the addition of 1.6 acres of impervious surface on the site and mature trees impossible to replace the heat island effect will only be worsened.</p>	<p>Thank you for your comment. The Arena project is seeking a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the buildings and high-reflectance paving materials which helps to offset the heat island effect. Those material upgrades were chosen to be incorporated into the project by UST to offset the heat island effect among other benefits. Table 2 on page 12 of the 2024 EAW Update discusses other adaptations of the projects to counter effects of the urban heat island effect.</p>
<p>Section 14 - Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)</p>	
<p>The list includes Handsome Sedge (Endangered), Kentucky Coffee Tree (more accurately the Kentucky Coffee Tree) and Swamp White Oak (both of Special Concern) all found on the project site but with no description of their disposition. Thus, the EAW is incomplete.</p>	<p>Thank you for your comment. A brief summary of these species including descriptions of their preferred habitat is provided as Table 8 in Section 14. Guidance from the Environmental Quality Board for completing environmental reviews does not stipulate that a description of disposition is required for a complete EAW.</p>
<p>Section 17 - Air</p>	
<p>The discussion lists four air pollutants: carbon monoxide, hydrocarbons, nitrogen oxides, and particulates. However, the EAW discusses only one of the pollutants: carbon monoxide. It fails to discuss hydrocarbons, nitrogen oxide or particulates, all included on the proposer's list. And all of serious environmental concern. The EAW is incomplete under Rule 4410.1200 (E) for failing to identify the potential environmental impacts of ALL the pollutants. There is no provision in the EAW rules for incomplete answers. Further under Rule 4410.1600,(B) which addresses written comments, it states, "The comments shall address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation before the project is commenced." It is impossible to address the accuracy of information that is not presented as required. It is also impossible to identify potential impacts that may warrant further investigation of the potential cumulative impacts of these pollutants. The RGU must attest that the EAW is accurate and complete by signature (EAW, page 64). The signature, which fails to recognize the EAW as deficient, must be withdrawn until a complete and accurate document is published for public comment.</p>	<p>Thank you for your comment. Nitrous oxide (N2O) is a type of greenhouse gas that is listed in the EQB's 2024 EAW Climate Guidance document. Tables 10, 11, and 12 provide emissions in metric tons of CO2 equivalent (CO2e), which is the standard unit for comparing the degree of potential climate impact caused by emissions of different GHGs. GHG emissions are converted to CO2e by multiplying nominal estimated emissions of each gas by its global warming potential. This calculation is completed in the US EPA's SGEC tool. The SGEC tool also calculates Nitrous Oxide and Hydrocarbons. This information is included in Appendix B of the 2024 EAW Update.</p>

Comment	Response
<p>The EAW completely fails the requirements of the EAW form by ignoring this vital section entirely without providing one word of strategy to minimize or mitigate the previously admitted harmful effects of vehicle emissions. It fails under Rule 4410.1200 (E) because it does not address "potential environmental impacts and issues that may require further investigation before the project is commenced, including identification of cumulative potential effects."</p> <p>It fails under the provisions of Rule 4410.1400 (B): "The RGU shall be responsible for the completeness and accuracy of all information." The RGU cannot possibly vouch for the completeness and accuracy of information that is manifestly missing.</p> <p>It fails under Rule 4410.1600 (B) which addresses written comments. "The comments shall address the accuracy and completeness of the material in the EAW, potential impacts that may warrant further investigation before the project is 'commenced.'" It is impossible for a reasonable person offering written comments to vouch for the accuracy of information that is required but not provided. It is, however, possible and required under Rule 4410.1600 (B) to address the completeness of the EAW - it is incomplete.</p> <p>Therefore, under Rule 4410.1700. Subp. 2a, which addresses EAWs with insufficient information, the RGU must either make a positive decision on the need for an EIS or postpone the decision on the need for an EIS in order to collect the lacking information</p>	<p>Thank you for your comment.</p>
<p>20 - Transportation</p>	
<p>The 2023 EAW traffic analysis failed to analyze traffic approaching from the south, primarily along Cretin Avenue, a major arterial street that intersects the campus. UST, however, has not ignored an approach to campus from the south, including it on its official website providing directions for visitors. The 2024 EAW focuses on only one intersection south of the campus, the unsignalized intersection of Goodrich Avenue and Cretin Avenue with recommendations for improvements to that intersection. But between Goodrich and Grand Avenue, which has rightly received much attention, lies Lincoln Avenue. Lincoln Avenue will provide a convenient outlet for frustrated drivers heading north who are stuck in event congestion. This "escape route" will only cause problems elsewhere. The transportation analysis is incomplete without so much as providing a traffic count from the south where housing density is increasing and the traffic along with it. Under Rule 4410.1600(B) the EAW as it currently exists is incomplete and, therefore, cannot be accepted.</p>	<p>Thank you for your comment. The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods.</p>

Comment	Response
<p>Traffic Operations: St Paul Seminary (SPS) Parking Lot. The addendum assumes that the SPS is currently using the Anderson Parking Facility (APF) citing the 2023 EAW as authority for this assumption. The 2024 EAW claims that the proposed SPS parking lot will free up 73 parking spaces for events. However, there is no mention of the SPS displaced parking in the 2023 EAW. Therefore, the assumption regarding displaced SPS parking is not supported by the record, is incorrect and cannot be used to support the assertion that 73 additional spaces will be available for event parking. Therefore, the 2024 EAW is flawed and does not provide the necessary accurate information to make an informed decision by the RGU.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The SPS Parking Lot project is proposing to construct 73 surface parking stalls as described in Section 6 of the 2024 EAW Update on page 7. Seminary parking was discussed within the 2023 EAW Transportation Study. "Table 4. Parking Demand of Impacted Lots" on Page 16 provides a detailed overview of the School of Divinity (SOD) Parking, while Page 26 (Table 12) outlines that the available event parking supply "Includes parking supply adjustments to account for parking loss caused by the arena footprint." • The SPS parking lot is not included in Arena parking estimates, and it will not be used for Arena events. However, seminarians are St. Thomas students and currently park on the St. Thomas campus. As noted in note 3 to Table 14 and note 2 to Table 16, if the SPS parking lot is built, parking supply on the St. Thomas campus is expected to increase from 40-70 spaces. This is because seminarians who currently park on the St. Thomas campus will park in the SPS parking lot, thus freeing up spaces on the St. Thomas campus.
<p>The parking counts provided in the 2024 EAW are seriously flawed because they are too limited to be reliable. In September 2024 SRF Consulting updated their Transportation Analysis. The so-called update relied on the same faulty parking analysis as the 2023 EAW. The 2023 EAW collected less than a week's worth of data to make a year's worth of projections. Besides that, SRF admitted the data was collected during a snowstorm. A reasonable person would not consider such a small sample size plus the outlier of a snowstorm to provide accurate information necessary to make an informed decision. The parking analysis fails for this reason and is not acceptable under Rule 4410.1600 (B).</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Parking data was collected during a typical weekend on campus and aligned with the scope established in collaboration with UST and City staff. • As mentioned on Page 11 of the 2023 EAW Transportation Study "There was a snowstorm on Friday night (3/31) into Saturday morning (4/1) during the SRF parking counts. However, the storm started after the Friday afternoon counts and the Saturday weather (40 degrees and sunny) generally cleared the roadways by the time of the Saturday afternoon counts, therefore, the parking counts as it relates to event availability are considered representative of typical weekend conditions for the campus area."

Comment	Response
<p>Throughout the planning process of both the 2023 EAW and the 2024 EAW, UST has struggled with how to handle a desired APF connection to the Mega-Arena. The connection was first shown in the 2023 plans along with a statement that the APF was designed to have two more floors added. Adding two floors to the APF would replace the 365 parking spaces removed from the UST South Campus (See 2024 EAW, p. 54). However, that would not address the need for a connection from the APF to the Mega-Arena.</p> <p>UST removed the skyway connection from the APF to the Mega-Arena in the 2024 EAW plans, asserting that there is no financing or Board approval for improvements to the APF at this time. The 2024 EAW, however, includes Appendix A, Table 10 entitled "Proposed Mitigation Strategies and Improvement." This table includes the heading "Infrastructure" and states, as a potential mitigation measure, that UST will "implement alternative access solution to APF if necessary." This could be a worthwhile mitigation recommendation, but it also means it must be considered part of a phased action or a continued action of the overall project and as such must be included in the 2024 EAW (Rule 4410.1000. Subp. 4). Simply put, UST cannot have it both ways. Either the 2024 EAW must be corrected to include reconstruction of the APF or, without specific plans for reconstruction, it must be removed from consideration as a mitigation strategy. As the 2024 EAW exists today, the vague statement that UST will "implement alternative access solutions to the APF if necessary" is not a specific, targeted or enforceable mitigation strategy because there is no commitment to do anything.</p> <p>In addition to failing to address critical parking deficits by adding two floors to the APF, UST's failure to include a skyway to the APF poses serious safety concerns for pedestrians. Without a skyway connection, pedestrians walking to and from the APF will be crossing in front of vehicles entering and leaving the ramp before and after events. Not only is this dangerous for pedestrians, but it will add to traffic congestion. A skyway connection to the Mega-Arena would ameliorate congestion and improve safety. In removing the APF connection from the plans entirely, the 2024 EAW fails to address serious congestion and safety issues and is, therefore, incomplete.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The requirement to implement an alternative access solution to the APF, if deemed necessary, was stipulated by the City of Saint Paul as part of the Site Plan Approval process. If the City determines that an alternative access is required, any necessary improvements would be subject to the standard City review process. • The removal of the skyway introduces additional pedestrian-vehicle conflicts, which are expected to reduce operational efficiency. To address this, it was recommended to improve pedestrian facilities (such as the traffic signal cabinet removal and widening of pedestrian facilities on the north side of Grand Avenue) and to station traffic control officers at the Cretin Ave/Grand Ave intersection before and after events to manage vehicular and pedestrian traffic safely and efficiently.
<p>Rideshare, Transit, and Shuttle Plans</p> <p>This proposal appeared in the 2023 EAW. As was the case more than a year ago, the 2024 EAW shows no verifiable contract with any rideshare company. A contract that doesn't exist is unenforceable as noted by the Minnesota Court of Appeals on July 8, 2024 when it remanded the 2023 EAW to the RGU for correction and completion. It would be inadvisable for the RGU to accept this unenforceable "mitigation" strategy in the 2024 EAW.</p>	<p>Thank you for your comment. As mentioned on Page 2 of the 2023 EAW Transportation Study "The main objectives of the study are to evaluate the existing operations and parking within the study area, identify any transportation/parking impacts associated with the proposed arena during event and non-event conditions, and recommend potential mitigation to address any issues." The City of St. Paul as the RGU is tasked with identifying mitigation measures before an EAW is complete to address any issues that were identified within the analysis. The contracts with rideshare, transit, and shuttle services would be completed as</p>

Comment	Response
	<p>an outcome of the environmental review and before the Arena is operational, not before the EAW is complete. The mitigation measures will be implemented and enforced through the issuance of a Certificate of Occupancy by the City.</p>
<p>Provide Communication on Alternative Transportation Options Commendable but unenforceable and therefore does not qualify as a mitigation strategy.</p>	
<p>Reduce Resident Parking Permits There are currently 369 unrestricted parking spaces on city streets near campus. These parking spaces receive heavy use and SRF Consulting, acting as UST's agent, provided no study of on-street demand for parking. There is no evidence that reducing permit parking in the Morrison Hall ramp won't shift those vehicles to the street. After all, they have to go somewhere. Thus, this does not qualify as a mitigation strategy.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.
<p>Provide Advanced Notice, Online Classes, and other Strategies with Parking Ramp Clearing Other Strategies? What other strategies? If UST has other strategies they need to be produced here and show they are part of a targeted, enforceable mitigation plan. Again, vague unenforceable proposed strategies do not meet the standards required Rule 4410.1600 (B). Thus, this does not qualify as a mitigation strategy.</p>	<p>Thank you for your comment. As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, St. Thomas will pair the time-of-day restrictions with early communication and clear notification to its internal staff, faculty, and commuting students prior to enforcing the event parking restrictions. This system is currently used for large events. St. Thomas will proactively work with faculty and the registrar to schedule online classes as necessary to reduce the number of vehicles coming to campus, to ensure the ramp clearing strategy is effective. Student residents with full time parking permits will not be displaced to avoid spillover to the neighborhood.</p>
<p>Provide Off-site Parking and Shuttle Services Negotiations are not signed contracts and provide no assurance that an enforceable contract will be signed. More than a year after the 2023 EAW was rejected by the Court of Appeals because there were no enforceable contracts, the 2024 EAW contains the same fatal flaw. The 2024 EAW does not show any signed contract or enforceable agreement with any entity to provide parking. Therefore, just as the 2023 EAW was deficient, the 2024 EAW is deficient. It does not include any enforceable contracts for parking and/or shuttle service and, therefore, once again does not meet the standards required to qualify as a mitigation strategy.</p>	<p>Thank you for your comment. As mentioned on Page 2 of the 2023 EAW Transportation Study "The main objectives of the study are to evaluate the existing operations and parking within the study area, identify any transportation/parking impacts associated with the proposed arena during event and non-event conditions, and recommend potential mitigation to address any issues." The City of St. Paul as the RGU is tasked with identifying mitigation measures before an EAW is complete to address any issues that were identified within the analysis. The contracts with rideshare, transit, and shuttle services would be completed as an outcome of the environmental review and before the Arena is operational, not before the EAW is complete. The mitigation measures will be implemented and enforced through the issuance of a Certificate of Occupancy by the City.</p>

Comment	Response
<p>UST chose to defy the decision of the Minnesota Court of Appeals - a decision upheld by the Minnesota Supreme Court - by continuing to build its Mega-Arena. Now, more than a year later, UST has still failed to provide the required information for a complete and valid EAW. This is a testament to UST's disregard for the environmental laws of the State of Minnesota - laws designed to protect the environment and the citizens of this State. Now, it is up to the City of St. Paul as the RGU to follow environmental law and protect its citizens.</p>	<p>Thank you for your comment.</p>

Craig Roen

Comment	Response
<p>20 - Transportation</p> <p>Specifically, event patrons will seek: (1) free parking over paid parking, (2) easy “in/out” parking over UST ramp and surface lot parking that will inevitably be choked during major events, and (3) the convenience of parking close to the arena rather than being bussed from remote locations. These factors will undoubtedly encourage event patrons to drive up and down nearby residential streets looking for free, convenient parking. In the language of the ordinance, it will cause “serious residential problems.”</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • These parking behaviors were considered throughout mitigation development and information regarding them is summarized below: • (1) For larger events, pre-paid parking assignments are expected to be incorporated into the online ticketing system. Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no cost to event patrons. • (2) Visitor parking ramps other than APF (i.e. ASC, McNeely, Tommie East, Tommie North) are expected to clear rather quickly. The APF is expected to take 20 to 35 minutes to clear post-event. However, it should be noted that that is the "total" ramp clearing time, and the average delay per vehicle exiting the ramp is expected to be around 10 minutes or less. • (3) Incentives such as offering a restaurant or bar for shuttle services, along with informing event patrons in advance that campus parking is unavailable, on-street parking is limited, and neighborhood parking restrictions are in place with clear warnings about ticketing/towing could help influence behaviors.

Comment	Response
<p>Event patrons’ parking behavior is not speculative. It is evidenced by students who seek out free parking near campus, and it happens every time there is a home football game. This is true even though UST offers free parking in the Anderson ramp for home football games. (See, https://tommiesports.com/sports/2022/8/14/football-parking.aspx). The parking policy for its home basketball games also provides for free parking at the Anderson ramp, but only on the weekends. (See, https://tommiesports.com/sports/2022/8/14/mens-basketball-parking.aspx). If UST follows suit with these existing parking policies once the arena is built (and it appears it intends to per the Updated EAW at p. 60), then only the Anderson ramp will be available for free event parking, and on a limited basis. Once that ramp is full, event patrons will be required to use on campus paid parking facilities, or in the alternative, park for free on neighboring streets. As experience has shown, football fans clog the neighborhood directly west of the stadium with (often illegally parked) vehicles and with overflow into other neighborhoods. It is reasonable to assume the same will hold true for major indoor sporting events, but now the neighborhood streets adjacent to the South Campus will be clogged with event patrons looking for free parking spots.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • It is a standing policy that UST discourages students from bringing their vehicles to campus if they are not awarded a parking permit. • UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets. • St. Thomas will work with St. Paul Police and Public Works Traffic to optimize parking enforcement during large events, including additional enforcement strategies to reduce illegal parking in residential parking permit districts.
<p>Further, the Updated EAW specifically states: “For post-event conditions, the total clearing times of the APF ramp are expected to increase from 15-30 minutes to 20-35 minutes.” This would be in addition to the lengthy delays and back-ups on Cretin, Summit, Grand and Cleveland Avenues. As such, event patrons will inevitably drive up and down neighboring streets looking for parking that allows for easier “in/out” access.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Visitor parking ramps other than APF (i.e. ASC, McNeely, Tommie East, Tommie North) are expected to clear rather quickly. The APF is expected to take 20 to 35 minutes to clear post-event. However, it should be noted that that is the "total" ramp clearing time, and the average delay per vehicle exiting the ramp is expected to be around 10 minutes or less. • After events, the Cretin/Grand and Cretin/Summit intersections are expected to see delay, but both are expected to be managed by traffic control officers during well attended events. Once users are able to clear these intersections, minimal delays are anticipated on the surrounding roadways.
<p>Finally, regarding the proposed bussing and alternative transport mitigation measures, the Updated EAW provides only speculative numbers, apparently not tethered to any research. It also lacks a specific action plan. The proposal of free bus tickets (not confirmed as something Metro Transit would agree to) and shuttles from bars (without any commitment from, or established agreements with, a single business), or discounted ride sharing (based only upon “preliminary discussions”) is just smoke. And even if these proposals were to come to fruition, the overall impact would be nominal. Therefore, regardless of how the numbers have been crunched, this key behavioral factor should have been considered and mitigation plans should have been included to address event patrons’ rational behavior. In other words, the rational behavior of event patrons will cause</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • These strategies have been recommended as part of the EAW, and specific partnerships and details are expected to be refined and finalized as part of the Event Management Plan. • As mentioned on Page 18 of the 2024 EAW Update Transportation Analysis Addendum, preliminary discussions have taken place with Metro Transit, primarily focused on the implementation of free transit passes.

Comment	Response
<p>congestion, pollution and safety hazards in the surrounding residential neighborhoods, something that the Updated EAW should specifically address.</p>	<ul style="list-style-type: none"> • UST has had preliminary discussions with potential locations and several restaurants and bars are interested in partnerships. In addition, the Office of Alumni Affairs will coordinate events before games at establishments with shuttle partnerships. Specific partnerships and details on restaurant/bar shuttles are expected to be finalized and outlined as part of the EMP.
<p>I propose three mitigation measures beyond what is currently included in the Updated EAW, each dependent upon the other:</p> <p>1. For all UST arena events, all on-campus parking should be free of charge for event ticketholders.</p> <p>This would at least somewhat level the playing field. It would give event patrons the opportunity to park close to the arena, on campus, and without cost. Further, the cost to UST would be self-limiting: UST’s lost parking revenue would be limited to ticketholders who choose to drive to events.</p> <p>Support for this mitigation measure can be found in the Updated EAW which represents that current on-campus parking availability is sufficient to meet the needs for most events. This is good as far as it goes, but UST should incentivize event patrons to fill those spots with an offer of free on-campus parking.</p>	<p>Thank you for your comment. Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no cost to event patrons. However, it should be noted that free parking provided may discourage the use of transit or other multimodal means of traveling to the Arena.</p>
<p>2. Before and during UST arena events, UST should place temporary signs directing event patrons to on-campus parking.</p> <p>On Oct. 23, 2024, I observed orange and black temporary signs at several locations near the South Campus that announced: “UST EVENT PARKING” with directional arrows. A photo is at the bottom of this document. So, clearly UST can place temporary signage specifically related to event parking. This would go a long way to direct event patrons to on-campus parking and away from the surrounding neighborhoods.</p>	<p>Thank you for your comment. This strategy will be considered. However, on-campus parking is expected to be pre-assigned and directions to designated parking spots will be provided online.</p>

Comment	Response
<p>3. Before and during UST arena events, temporary “no event parking” signs should be placed in and around streets surrounding and near the UST arena to disburse off-campus event patron parking to minimize its impact on the neighboring community.</p> <p>UST may claim it has no authority to place signs limiting parking on a temporary basis. However, there appears to be no City ordinance preventing the City from placing these types of signs as needed. The City clearly exercises its authority to do so as evidenced by the fact they are already used for a variety of routine municipal purposes. In the alternative, it may grant itself explicit authority. Municipalities regularly employ this parking management tool. Indeed, Minneapolis has expressly granted itself that authority: [language from Minneapolis § 70.36 (A)]</p> <p>To the extent UST and the City are serious about addressing UST neighbors’ concerns and solving the problem, the Updated EAW should include a plan for placement of temporary signage during UST arena events. Indeed, UST should commit to using its best efforts to work with the City to develop and implement a reasonable, effective plan.</p>	<p>Thank you for your comment. Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community.</p>

Saint Paul Seminary c/o Mark Thieroff

Comment	Response
<p>6 – Project Description</p> <p>By way of introduction, the Seminary is a Minnesota non-profit corporation that owns certain real property immediately adjacent to the St. Thomas campus and the land on which St. Thomas proposes to build an arena. While the Seminary and St. Thomas collaborate in certain ways in the pursuit of their own institutional missions, they are distinct legal entities in all respects, and they independently own, operate and develop their respective real estate holdings.</p> <p>The Seminary is currently developing a new 73-stall parking lot on its property. That project falls below all thresholds for mandatory environmental review, and it has already received conditional site plan approval from the City, an erosion control permit from the Capitol Region Watershed District, and an NPDES authorization from the Minnesota Pollution Control Agency. Construction of the parking lot is planned to begin in early 2025.</p> <p>St. Thomas, as the Proposer of the arena project, and its consultant included information about the Seminary’s parking lot project in the updated EAW. This includes referencing the parking lot project in the Project Description in Section 6 of the EAW. The Seminary was not provided with a draft of the updated EAW before its was submitted to the City.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The City of Saint Paul was required by a July 2024 decision by the MN Court of Appeals to revise a 2023 EAW completed for the proposed arena. The Court decision did not specifically address any matters related to the proposed Seminary parking lot, and that project was not addressed in the 2023 EAW. However, the Court decision did require further consideration of a nearby development considered to be a “phased action” in its opinion, specifically citing the nearby Schoenecker Center, an academic building on the St. Thomas South Campus that opened in early 2024. • In the spirit of the Court decision, the City opted to include the Seminary parking lot project for consideration of “cumulative effects” given the proximity and overlapping timing of the project to the separate St. Thomas Arena project. The City agrees that the proposed Seminary parking lot is not a “Connected Action” as defined under MN R. 4410 relative to the proposed Arena project under review, and should not have been characterized as such. The City also agrees that parking lot project itself does not trigger any requirements for environmental review under MN law. The City acknowledges that this classification was done in error and without prior communication to the Seminary, as you note.

Comment	Response
<p>To be clear, the parking lot is not part of the proposed arena project, and it is also not a “connected action” under Minn. R. 4410.0200, Subp. 9c.</p>	
<p>9 – Permits and Approvals Required</p>	
<p>More troubling, however, is the inclusion of the parking lot project in Section 9 of the EAW, which enumerates the permits and approvals required for the project under review. This appears in Section 9 of the updated EAW, which states,</p> <p>List all known local, state, and federal permits, approvals, certifications, and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules Chapter 4410.3100.</p> <p>Section 9 of the updated EAW proceeds to list not only the various approvals needed for the arena, but also all of the approvals that the Seminary requires for its parking lot project. As a consequence, under the italicized language above, the updated EAW purports to bar the issuance of the approvals that would allow the Seminary to construct the parking lot on its property until St. Thomas completes all required environmental review of the arena it proposes to build on its property.</p> <p>As the quoted language above is part of the form EAW that is provided to project proposers by the Environmental Quality Board, it may be the case that the list of necessary project approvals was prepared without recognition of the prohibition in the final, italicized sentence in that paragraph. In any event, there is no legal basis for the inclusion of the parking lot project in Section 9, and certainly no legal basis for an EAW to prohibit the issuance of approvals for a project that is to be undertaken by someone other than Proposer, on land owned by someone other than the Proposer.</p>	<p>The City agrees that the proposed Seminary parking lot restrictions on permitting under MN R. 4410 do not apply and that any references to permit requirements regarding the parking lot project were included in Section (or “Item”) 9 of the updated EAW in error. The error will also be noted in the Findings of Fact for the updated EAW.</p>

Comment	Response
<p>In light of the foregoing, the Seminary requests that the City clarify in its response to the public comments on the updated EAW and through the findings and fact and resolution on the need for an Environmental Impact Statement that the approvals needed for the Seminary’s parking lot project should not have been included in Section 9 of the updated EAW and that the prohibition on final government decisions under Minn. R. 4410.3100, Subp. 1, does not include final governmental decisions needed for the parking lot project.</p>	

Summit Ave Residential Preservation Association (SARPA) - c/o Kathryn Cairns

Comment	Response
16 - Visual	
<p>Page 46- The EAW is to describe any project-related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects. Glaring omissions are noted in the UST EAW response with diminished respect for the impact of visual effects (lights) and vehicle traffic lights on west Summit Ave, a designated national historic district. Vehicles exiting from the UST south block onto Summit Avenue shine headlights directly into residential houses at night on Summit Avenue. To reduce reported current and potential increasing glaring headlights of vehicles on Summit Avenue residential areas, more access to Cretin Avenue and Mississippi River Blvd are needed. SARPA strongly encourages the City of St Paul and the University of St. Thomas to require non-gated access to a second Cretin Avenue exit (for busses and trucks) and a non-gated access to Mississippi River Blvd.(for Uber/Lyft and drop off vehicles) to reduce residential areas impacted by the visual effects of the project.</p>	<p>Thank you for your comment.</p>
19 - Noise	
<p>Page 53- Construction Noise has been reported by neighbors by the west block/arena site as early as 6am, which is contrary to what is claimed by the UST EAW. SARPA strongly encourages the City and UST to enforce the 7am start time for construction in light of existing neighborhood complaints in 2024.</p>	<p>Thank you for your comment. As noted on page 35 of the 2024 EAW Update, Saint Paul Code of Ordinance Chapter 293 Section 07 limits construction noise in residentially zoned districts to 65 decibels A (dBA) between the hours of 7:00am and 10:00pm, and 55 dBA between the hours of 10:00pm and 7:00am.</p>
20 - Transportation	
<p>Page 23- Policy LU-54 of the City of St Paul 2040 Comprehensive Plan “aims to ensure that campuses are compatible with surrounding neighborhoods by managing parking demand and supply, maintaining institution-owned housing stock, minimizing traffic congestion, and providing for safe pedestrian and</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The Schoenecker Arena has a seating capacity of approximately 2,000 event patrons as noted on page 19 of 2023 EAW Transportation Study.

Comment	Response
<p>bicycle access.” The proposed 5,500 seat Division 1 basketball/hockey arena is oversized-for the proposed location, especially considering that the University of St. Thomas has an existing 5,000 seat basketball arena in Schoenecker Arena. The UST documents indicate that between 900-1,650 cars (with 2.75 fans/car) and 5-12 team/fan buses (20,000 gross vehicle weight each) and 5-8 large vendor trucks (22,000-30,000 gross vehicle weight) will use neighborhood streets for each event at the arena with only ONE proposed entrance/exit to the location off to Cretin Ave. The Summit Avenue exit is the only other remaining access road to/from the south block. The Summit Avenue exit/entrance has weight restrictions established by the St Paul City Council. It was designated as a “Parkway” with a maximum vehicle weight of 9,000 pounds. City designated parkways are to support “the maximum enjoyment by all persons and protect the natural resources therein”. (St Paul Leg. Code 170.10). The University of St Thomas and St Paul Seminary staff have indicated that the second Cretin Ave. access road and the Seminary access road to Mississippi River Blvd. are for restricted use and will be gated. The proposed traffic volume of cars, buses and heavy-weight trucks into this two-block area will increase traffic congestion on Cretin Ave. and put pedestrians and bicycle riders at risk of accidents, especially during late afternoon/ evening games. Uber/Lyft users and drivers going to/from this south block also have no safe parking/loading area in the EAW response. Emergency vehicle access within the south block is severely limited due to the locked gates on the second Cretin access road and Mississippi River Rd access road. This lack of adequate access roads for cars, trucks, team buses, emergency vehicle/EMS vehicles, and Uber/Lyft vehicles poses life-safety risks to attendees and neighbors. SARPA strongly encourages the City of St Paul and the University of St. Thomas to require non-gated access to a second Cretin Avenue exit (for busses and trucks) and a non-gated access to Mississippi River Blvd.(for Uber/Lyft and drop off vehicles) to reduce life-safety risks during hours when the arena and facilities are in high use.</p>	<ul style="list-style-type: none"> • The City requires all large commercial vehicles to utilize designated truck routes to the maximum extent possible. Changes were made to the Arena project design in order to bring Arena service vehicles in and out of a new access point to Cretin Ave. • The southeast Cretin Ave access point will have a controlled gate arm, card reader, and intercom system to operate. UST campus security can raise the gate arm in an emergency situation to allow emergency vehicles access. • The City of St. Paul required the vehicular gate arm at the southeast Cretin access point through the Site Plan Review process in order to ensure that access point is not used throughout the day by normal vehicles and causing delays along Cretin Ave. UST campus security can raise the gate arm in an emergency situation to allow emergency vehicles access. UST does not have vehicular access to Mississippi River Boulevard, the current access point enters the St. Paul Seminary property and extends towards the UST campus at a much lower elevation, prohibiting access for emergency vehicles. • The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. Note there were four (4) study intersections along Summit Avenue as part of the transportation analysis to identify traffic impacts of the arena.
<p>Page 54- The proposed St. Paul Seminary surface parking lot was understood to be used for seminarians, not as additional game day parking for the University of St Thomas as noted in the EAW. Concerns were raised about income generated for this preferred parking area on game days and whether that is benefitting the St Paul Seminary or the University of St Thomas. This parking area has the potential to be an Uber/Lyft and drop off/pick up location for events to reduce circling vehicles seeking parking/pick-up/drop off locations. SARPA strongly encourages the City, the St. Paul Seminary, and UST to utilize the proposed Seminary parking lot as an Uber/Lyft and drop-off/pick-up area during high attendance events.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The SPS parking lot is not included in Arena parking estimates, and it will not be used for Arena events. However, seminarians are St. Thomas students and currently park on the St. Thomas campus. As noted in note 3 to Table 14 and note 2 to Table 16 of the 2024 EAW Update, if the SPS parking lot is built, parking supply on the St. Thomas campus is expected to increase from 40-70 spaces. This is because seminarians who currently park on the St. Thomas campus will park in the SPS parking lot, thus freeing up spaces on the St. Thomas campus.

Comment	Response
	<ul style="list-style-type: none"> • Thank you for the suggestion for Uber/Lyft drop off. This alternative may be evaluated as part of the event management plan. However, it is important to note that UST does not have control or authority over the SPS parking lot, if it were to be constructed.
<p>Page 55- The effect on traffic congestion on affected streets around the proposed arena site should require a separate Traffic Impact Study. Vehicle trips for each event will exceed 3200 trips based on the UST reported traffic estimates. SARPA is especially interested in the impact of the additional traffic on Summit Avenue, a weight-restricted road in a park, residential, and federally designated historic area. The description of the traffic mitigation notes that a second access driveway will be constructed by UST on the Southeast block of Cretin Ave for pedestrian access, emergency vehicles and potentially for buses. SARPA requests that this second access on Cretin Avenue be left un-gated and be the primary access for buses, trucks and vehicles exiting the arena block, consistent with reducing the weight of vehicles on Summit Avenue.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. Note there were four (4) study intersections along Summit Avenue as part of the transportation analysis to identify traffic impacts of the arena. • The City of St. Paul required the vehicular gate arm at the southeast Cretin access point through the Site Plan Review process in order to ensure that access point is not used throughout the day by normal vehicles and causing delays along Cretin Ave. UST campus security can raise the gate arm in an emergency situation to allow emergency vehicles access. UST does not have vehicular access to Mississippi River Boulevard, the current access point enters the St. Paul Seminary property and extends towards the UST campus at a much lower elevation, prohibiting access for emergency vehicles.

Lee Schafer

Comment	Response
<p>The EAW, as updated, doesn't seem like a very good work product. Maybe it's because the arena is under construction and the City and UST want to meet what's required by spending as little time and money as possible. If I had to highlight one issue, it's the inadequacy of the analysis and impacts for the costs of St. Thomas's plan to accommodate the cars of all the event attendees, an inadequacy that suggests a failing of basic common sense.</p> <p>The EAW disclosed preliminary discussions of ride-share and transit options. The EAW disclosed free parking in Anderson Parking Facility onsite but only for weekend events. The EAW forecast "clearing times" at Anderson increasing after events to up to 35 minutes.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no cost to event patrons, regardless of day/night. • It should be noted that this is the "total" ramp clearing time, and the average delay per vehicle exiting the ramp is expected to be around 10 minutes or less, which may be equal or close to the total walking/exiting time for those who would park in the neighborhood.

Comment	Response
<p>This is what we know about incentives: People do respond to them. "Free" parking beats parking with monetary fees. Convenient car parking close by beats subsidized transit and ride-share, even if such options had been worked out. Walking five minutes into the neighborhood and then quickly exiting the area in your car beats idling 35 minutes in a traffic scrum.</p>	<p>Thank you for your comment.</p>
<p>I have seen a proposal a neighbor worked out, three steps that have to work together. I strongly agree with this proposal. One, onsite parking at UST (anywhere on campus) needs to be free for event attendees, every day and for every event. Two, ample event-day signage needs to be put up to direct people to the onsite parking, with similar information shared with users when the tickets are sold. And three, streets adjacent to the site should have temporary "NO EVENT PARKING" restrictions on event days, clearly marked. Enforcement is a question -- sadly, norms about how to behave and follow rules seem to have slipped a lot lately -- but the City staff may have some solutions to that enforcement problem.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • 1) Initial project discussions suggest that parking passes or assignments at visitor facilities are expected to be provided at no cost to event patrons. However, it should be noted that free parking provided may discourage the use of transit or other multimodal means of traveling to the Arena. • 2) This strategy will be considered. However, on-campus parking is expected to be pre-assigned and directions to designated parking spots will be provided online.. • 3) Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum documents the recommended parking mitigation strategies, which are intended to reduce parking demand on campus, enhance overall mobility, and lessen the potential impact on the neighboring community.
<p>Of course it's true that there are very few things that are truly "free" to the consumer, and it's also true that somebody else is often bearing some or all of those costs. What UST has decided, disclosed in its own EAW, is that it's going to push a lot of cost for parking that it did not want to provide on to people who have happily coexisted with St. Thomas for years. There is a tipping point, for reasonable neighbors living next door to an institution like UST, and this feels like a totally unnecessary shove past it.</p>	<p>Thank you for your comment.</p>

Paul and Karen Schanfield

Comment	Response
<p>A college/university that is right in the midst of a neighborhood and near a national treasure of the Mississippi River should NOT BE ALLOWED TO BUILD AN ARENA THAT WILL POLLUTE THE RIVER AND DESTROY OUR NEIGHBORHOOD BY CONGESTION OF THOUSANDS OF PEOPLE ATTENDING EVENTS WITH NO PLACE TO PARK! It is my understanding that not only is there no new parking for thousands of cars but some of the current campus parking is being eliminated to build the arena.</p>	<p>Thank you for your comment. Parking is discussed in Section 20 of the 2024 EAW Update and additional detail is available in Appendix D: September 2024 EAW Update Transportation Analysis Addendum. Stormwater management is described in Section 12.</p>

Steve Sikora

Comment	Response
<p>UST's assertions, both unquestioned by the City of St. Paul, are attendance and frequency of events. As the designated (RGU) Responsible Governmental Unit charged with approval of the EAW, it is the duty of the City to question the validity of UST's claimed, projected uses of the arena. The EAW states that the City has reviewed the assumptions, yet the worksheet does not come close to disclosing the full extent of use this facility will provide.</p> <p>An existing pre-event and post-event peak hour trip generation was estimated for a maximum capacity event at the project site, which would be an event held in the Arena, based on assumptions that were discussed and reviewed by UST and City of St. Paul throughout the study process. (EAW page 54)</p> <p>It is the duty of city government to consider the veracity of all assumptions put forth by the University of St. Thomas, because these assumptions directly influence the results of the studies in the EAW. Furthermore, an accurate measure of arena use cannot be reflected in a snapshot of the initial months of operation. A comprehensive understanding of environmental impact must take into account a mature facility and all of the consequential, future burdens upon city services and stresses on the neighborhoods, in perpetuity. Particularly, when future use has already been publicly announced in the press.</p> <p>If poorly forecasted arena use was accidentally overlooked in the first EAW, there is certainly no excuse for it in a court-ordered, revised version. Yet, this revised EAW attempts to further minimize the perception of arena use and impact.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The 2024 EAW Update appropriately followed the worksheet guidance as established by the EQB. The City worked with the University of St. Thomas to estimate conservative data points for the anticipated use of the Arena, and the City utilized those conservative assumptions with numerous technical resources, local event studies, and event travel characteristics around the Twin Cities and county throughout the document analysis. • The forecasted Arena use is reasonable based on known information.

Comment	Response
<p>From "Introduction"</p> <p>Since the publication of the negative declaration on the need for an EIS on September 26, 2023, the size of the proposed Arena has decreased slightly. The total size of the Arena was reduced from 270,000 GSF as listed in the 2023 EAW to approximately 252,000 GSF. The maximum attendances for hockey and basketball events have changed from 4,000 and 5,500 to 4,005(2) and 5,324(2) respectively. Non-athletic events such as commencements could still be arranged for seating of approximately 5,500 seats, depending on the stage configuration. Seating for 4,523(2) could be provided in "end stage" configuration and 5,500(2) for a "center stage" configuration. For the purposes this 2024 EAW Update, the proposed size and/or capacity of the Arena used for the 2023 From "Introduction" footnotes</p> <p>(2) The seat counts listed are based on the latest Arena design plans dated July 24, 2024 and are subject to change as design continues to advance.</p> <p>From "Introduction" (Page 3)</p> <p>However, where relevant, the 2024 EAW Update will note potential effects of the decreased project size and/or capacity.</p> <p>The Introduction implies that since the first EAW was completed, the arena has been reduced or modified in ways that make it less environmentally intrusive. It states that arena size and seat count have dropped incrementally below the original 270,000 (GSF) gross square footage estimate down to 252,000 GSF and from 5,500 seats down to 5,324 seats, implying that the impact would be less significant than originally anticipated. At-a-glance these statistical highlights appear to be a concession to the court of public opinion and those opposed to the project, but the changes are insignificant.</p>	<p>Thank you for your comment. The Introduction section was included to simply provide background of the project as it pertains to the 2023 EAW and what has changed within the project since completion of the 2023 EAW. The numbers were updated throughout the document to provide the most accurate numbers for a more comprehensive understanding of the environmental impacts.</p>

Comment	Response
<p>While providing some PR value, the minor downsizing in overall square footage of the building and reduction in the precise number of seats are of little consequence when it comes to the real-world environmental impact of events being held in the facility. The issue here, is the relative scale of the facility insitu, not the difference between 5,334 seats and 5,500 seats. If the fire code permits 5,324 seats then that is the best measure of potential for attendance. Since attendance is speculative, the EAW should be addressing the greatest potential for attendance rather than the most conservative estimates as provided by UST. The attendance numbers (which also affect traffic, parking, pedestrian traffic and so on) does not include standing room tickets, or participants, or the number of people in support and service positions such as; referees, food service, custodial staff, security, box office, medical teams, trainers, etc. This arena, while relatively small compared to a professional sports stadium, is a behemoth when shoehorned into a small campus, sequestered in a residential neighborhood. The arena events and commuting spectators will be a chaotic disruption to the residential streets near campus and will repeatedly become a major source of traffic congestion on Cretin, Summit, Grand and River Boulevard before and after every event. At arena events that approach full-capacity, as the EAW's Traffic Study admits, the traffic LOS will be rated as E-F, gridlock for 20 to 30 minutes pre and post events. This is undisputed. But what UST would like the public to believe is that this LOS problem will be a rare occurrence. However, when seen in the light of the actual number of capacity events, not just games, but events, it will be the norm rather than the exception. During the span of each and every LOS E-F level event it will be impossible for police, fire and emergency vehicles to pass through the 6 affected intersections, for a period of 20-30 minutes, in times of crisis, posing a threat to life and property. Without question, there will be more events and far larger crowds than proposed in the EAW. One UST claim of capacity sporting events alone is 35 games.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The attendance projections are data-driven, based on other Division 1 programs within UST's conference (or future conference for men's hockey), excluding the top and bottom capacity programs. • As mentioned on Page 15 of the 2024 EAW Update Transportation Analysis Addendum "As previously assumed, there is expected to be sufficient parking in separate commuter/staff lots to accommodate UST players, coaches, and event vendors/staff, therefore, they were not included in the parking demand analysis". Additionally, these users are expected to arrive and depart outside of event peak hours. • The maximum attendances for hockey and basketball that were analyzed in the 2024 EAW Update are intended maximum attendances. St. Thomas will not sell standing room tickets that cause spectator attendance to exceed those thresholds. • Emergency vehicles will utilize lights and sirens to travel through congested areas similar to other areas of the city and state.
<p>Which brings us to the second significant issue with the EAW, the gross understatement of the number of major events that UST put forth as the basis of studies. (Table 14) suggests that there is ample available parking, noting only a possible 3 games in which attendance will exceed available parking. The threshold for available parking is defined as games over 3,000 spectators. But UST's "available parking" in itself, is a shell game foisted on the public. UST has never disclosed the total number of spaces on campus and how many of those spaces are already committed to UST permit holders. Based on UST's website we know that St. Thomas is a commuter school. 2/3rds of students (approximately 6,100 students) and all faculty drive to campus. Students, including those living on campus not lucky enough to win the lottery for parking permits, already park their vehicles in the surrounding neighborhoods. Outside of the approximately 777-space Anderson Parking Ramp no explanation as to where the available parking spaces are or how spectators will be directed to them exists. The revised Mitigation Strategy in the EAW (page 7 of the SRF Memorandum No. 16489) mentions a "smart parking system." It shows a sample screen with lot locations and available spaces but fails to explain how that would work or if a phone app would be developed. And if a phone app was created, how it would be adopted by spectators of all events. Along with attendance and frequency of event assumptions, UST's parking projections are so opaque that they simply cannot be verified.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Visitor parking locations, including the APF, are shown on Figure 1 within the 2024 EAW Update Transportation Analysis Addendum, and Table 3 (Page 14) indicates how many parking spaces are expected to be available during each event times, assuming no mitigation. • Page 17 describes the process of how event users would be provided a designated parking pass (as available) as part of purchasing their event tickets. Directions and wayfinding are expected to be provided to their designated parking space. • The "smart" parking system is expected to provide the most benefit during daily non-event conditions and lower attendance events. For larger events, parking is expected to be pre-assigned, and the

Comment	Response
	<p>smart parking system could provide wayfinding indicating that visitor lots are full or limited to pre-assigned event parking only.</p>
<p>Reasons to question UST’s attendance projections:</p> <ol style="list-style-type: none"> 1. Having 40-years of experience in the field of design, specifically design and branding for national retail clients such as Target, Apple, Dayton’s, Macy’s and other major retailers. During my career I had the opportunity to collaborate with world renown architects and practitioners in all areas of design. A universal concept in every discipline of design, be it retail store planning, packaging, display, events, signage, print publications, communications, presentations, websites, apps or product design. Design is based on purpose. Things are not designed in an arbitrary manner, whose purpose is to be determined later. The very foundation of design is understanding the specific intended purpose, then discovering and defining solutions that serve that purpose best. In fact, a phase in the process of design is called discovery, where purpose is carefully studied prior to any planning or design. It is certain that UST chose to build a 5,500-seat arena because through its own discovery process it determined the need for a venue of that scale. One builds a 5,500-seat venue only when expecting 5,500 attendees. 2. Whether you are a commercial enterprise, or a non-profit it would be fiscally irresponsible to build a 5,500-seat arena when a 2,500-seat arena would suffice. If a typical game routinely hosted 2,500 attendees and only one big game per year required a 5,500-seat arena, it would hardly justify the cost to build an arena 1/3 again the size required. The optics of a half-filled arena would not look good for the brand image either. So perhaps a 3,000-seat arena would be built. Clearly UST chose to construct a 5,500-seat arena because a majority of events will require 5,500-seats. 	<p>Thank you for your comment.</p>

Comment	Response
<p>3. When an institution spends over \$175 million on a sports arena it will have a great responsibility to fill it as often as possible to pay for the facility, its changeovers and maintenance. To justify its existence and the already anticipated future uses, the term “multipurpose arena” was specifically employed, rather than “sports arena.” Like the 5,500-seat size, this descriptor too, is no accident. Even though the Attendance Analysis statistics only refer to games, specifically UST games, clearly there are other intended uses that are being glossed over. However, in the press and in neighborhood council meetings, over the past year, numerous mentions have been made of other kinds of events. These other events would be rentals to generate income for UST. Commonly suggested events included high school sports and commencement ceremonies. But lucrative rental opportunities like concerts and even conventions have been proposed. Why are these kinds of events not included anywhere in the statistical impacts of the arena? Events that utilize the arena floor could easily generate attendance numbers at or above the 5,500-seat mark. And the vehicular traffic necessary to support such a range of diverse events would be considerably different, and potentially greater than the fleet of support vehicles related to sporting events. More trucks onsite as well as a greater number of spectator cars, since students will not necessarily be among the attendees.</p>	<p>Thank you for your comment. Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum show an estimate of non-athletic events to be held at the Arena. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented.</p>
<p>4. In UST’s own words, both Division 1 sports and the arena are expensive: Anderson Arena Funding nears completion as St Thomas adjusts to D1 costs (Tommiimedia, October 31, 2023) https://www.tommiimedia.com/anderson-arena-funding-nears-completion-as-st-thomas-adjusts-to-d1-costs/ In the article, Senior Associate Athletics Director, Ben Fraser touted the growing following for UST sports: Fraser says that other examples like the nearly 1,000 St. Thomas fans who were present for the football team’s away game at Harvard on Sept. 16 further demonstrate the athletics department’s progress in developing a dedicated Division I following. The piece mentioned the already burgeoning cost of D1 athletics: But this differentiation has come with a price tag. The \$17 million in spending reported in the university’s EADA report for 2021-22 was over triple the cost of typical operating expenses when St. Thomas was in Division III. UST students will bear some of the cost with a \$300 athletics fee for undergraduates. But as relief Fraser added: The new arena will also generate revenue through use for commencements, concerts and rentals of the arena’s second sheet of ice. Much of the money from these rentals will go towards covering the costs of maintaining the new complex, according to Fraser. Clearly commencements and community sports will not alone generate the much-needed revenue to maintain the arena and support Division 1 programs. So...</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>Frequency of events In articles in the press and mentions in neighborhood council meetings, UST has been dropping hints about the many potential uses for its new arena. On January 20, 2024 in the UST Neighborhood Relations Newsletter Assistant Dean of Student Life, Josh Hengemuhle, wrote: The arena will provide new opportunities for St. Thomas to partner with local public and private schools, youth sports organizations, nonprofits, businesses and other organizations. Our goal is to create a new economic asset for the benefit of the community.</p> <p>The key words being “economic asset,” not one for the community, but for UST.</p> <p>On May 15, 2024, long after the 2023 EAW was approved, the National Collegiate Hockey Conference made a surprise announcement on their website under the headline: NCHC Adds University of St. Thomas as Newest Member Beginning in 2026-2027.</p> <p>https://nchchockey.com/news/2024/5/14/mens-ice-hockey-nchc-adds-university-of-st-thomas-as-newest-member-beginning-in-2026-2027.aspx</p> <p>It declared: With the addition of St. Thomas, the NCHC will become a 10-team conference in two seasons when the Tommies are officially welcomed as an NCHC member on July 1, 2026.</p> <p>“St. Thomas’s institutional vision and commitment to nationally competitive hockey, as well as their central location in our footprint and new facility, make them an ideal fit,” NCHC Commissioner Heather Weems said.</p> <p>UST’s desire to achieve Division 1 status drove the need for a gigantic new arena. The arena and Division 1 designation in turn demanded enormous financial resources. That fiscal pressure assures the highest number of lucrative, rental events possible.</p> <p>“On behalf of the Board of Directors, I am thrilled to welcome the University of St. Thomas to the NCHC. St. Thomas is an excellent institution of higher education that will add academic and competitive value to our conference,” said University of Nebraska at Omaha Chancellor and Chair of the NCHC Board of Directors Dr. Joanne Li. “Since transitioning to the Division I level, St. Thomas has made significant investments into its athletic department and facilities that has positioned its hockey program well to compete successfully in the NCHC.”</p> <p>The announcement that UST Men’s Hockey was being ushered into a more competitive conference included some of the school’s qualifications: The University of St. Thomas is located in Saint Paul, Minn. and has an enrollment of 9,146. The Catholic university, which first opened in 1885, has produced approximately 115,000 alumni, with more than 85 percent residing in the Twin Cities metro area (read driving distance). St. Thomas is located in a top-15 media market nationally that is home to six major professional sports teams. The Tommies themselves sponsor 21 Division I sports, including men’s and women’s ice hockey, with the majority of their other sports in The Summit League.</p> <p>A dense concentration of local alumni guarantees exceptional crowds at UST D1 games. There is ample evidence in the press that the EAW’s low attendance projections need to be honestly reconsidered by the City. Perhaps an EIS is the only way to ascertain the truth.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum show an estimate of non-athletic events to be held at the Arena. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented. • Pages 11-13 of the 2024 EAW Update Transportation Analysis Addendum discusses the change in men’s hockey conference and the increased average attendance anticipated. • The attendance projections are data-driven, based on other Division 1 programs within UST’s conference (or future conference for men’s hockey), excluding the top and bottom capacity programs.

Comment	Response
<p>UST Hockey Attendance Projection Changes</p> <p>Men’s Hockey games will increase in number and those games will be at or near capacity. The following chart labeled “Figure 2 – Attendances per Men’s Hockey Conference” shows a 2023 comparison between the CCHA and NCAA conference attendance which puts the average attendance for the new conference at 4,700 spectators, a number that exceeds the capacity of the UST arena in hockey configuration. In other words, every Men’s Hockey game can be expected to be a full capacity game. And the EAW fails to mention the potential for tournaments in its projections. Yet (On page 57) Table 14: Event Parking Demand Analysis by Attendance still shows statistics from the 2023 EAW.</p> <p>The table, used to dispel the need for parking mitigation estimates attendance by sport and claims the following crowd sizes by number of games.</p> <p>5,500 - 4,500 (2) 4,499 – 3,500 (19) 3,499 – 2,500 (2) 2,499 – 1,000 (26) 66 total games</p> <p>While Appendix D, Figure 2 – Attendances per Men’s Hockey Conferences demonstrates a marked increase in attendance between an average attendance game in UST’s current conference CCHA which is 2,475 versus average attendance at a NCHC conference game of 4,700, where UST will be competing in two more seasons.</p> <p>An inaccurate assumption put forth in the original EAW and repeated here is that there will be only 1 or 2 “full-capacity” games held in the arena per year (page 57). But those statistics are contradicted by estimates related to attendance at NCHC games published elsewhere in the EAW. Remember, no fiscally responsible institution would build a 5,500-seat arena for a routine crowd size of 2,000 spectators. That’s not how design works. That’s not how fiscal planning works. Even common sense tells us it is wrong.</p>	<p>Thank you for your comment. Table 14 of the 2024 EAW Update includes the attendance projection changes as a result of the men's hockey team transitioning to the NCHC showing every men’s hockey event as at capacity.</p>
<p>(On page 56) Table 13: Event Parking Demand Analysis by Event Type</p> <p>There is a table entitled “Estimated Attendance at: Thursday/Weekday Night, Friday Night, Saturday Night,” there is no mention here or anywhere else in the EAW of Sunday afternoon hockey games which already appear on the current 2024-2025 Men’s Hockey Schedule.</p> <p>https://tommysports.com/services/schedule_txt.ashx?schedule=392</p> <p>How can a traffic and parking analysis be accurate when it neglects one full day of the week?</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The 2023 EAW Transportation Study states on Page 20 that "event times can vary" and "that men's hockey/basketball may have day games sporadically throughout the season, either on a weekend or holiday." • The focus of the traffic operations was a maximum capacity basketball game on a weeknight, to represent a worst-case from an attendance, parking, and traffic perspective.

Comment	Response
<p>The City of St. Paul is responsible for the accuracy of the EAW</p> <p>It is the obligation of the City as RGU to anticipate all arena uses including future ones, not just the ones UST wants us to examine, because the City and its tax paying citizens will be left to pay the price when the true impacts of the arena play out.</p> <p>Minimized attendance estimates and frequency of use projections, particularly when left unmitigated, will only create traffic and parking mayhem on a regular basis.</p> <p>Furthermore, full-capacity events will not be required to clog neighborhood streets with spectator’s cars. Because the revised EAW still assumes the use of “nearby on-street parking near to campus” (page 56). It admits that even under capacity games up to 2,600 attendees will require neighborhood streets to host attendee’s cars.</p> <p>But false assertions by UST attempt to deceive. Parking (based on attendance assumptions) (Page 56)</p> <p>Key findings indicate that approximately 54 of the 66 anticipated sporting events are expected to have a parking surplus, without any mitigation measures. Of the 12 games where a parking deficit is expected, 9 are expected to only have a deficit of 35 spaces.</p> <p>Despite the detailed Transportation Study undertaken by SRT the baseline assumptions used in the study are pure conjecture on the part of UST, meant to diminish the perceived impacts of the facility and events. These figures are greatly diminished. Men’s NCHC Hockey alone will create 17 full-capacity games!</p> <p>Apparently, the City knew about this. At least the EAW sclaims it is so. (Page 19 of the Transportation Study, drafted June 9, 2023 and unchanged in 2024) states:</p> <p>Various event-related assumptions were developed through discussions with UST and the City of St. Paul throughout the study process. These assumptions lay the framework for the event conditions analysis, to help identify (or mask) problem areas and potential mitigation. The following event background/assumptions are summarized in the following section.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>In the EAW under the heading “Current Events” are bulleted a list of UST men’s and women’s sports, venue and current attendance numbers. Men’s football games were listed first, possibly because of the much higher attendance numbers ranging from 4,000 to 6,500 patrons. Of course, football events will not take place in the arena so I have to assume football was included only to demonstrate that UST is already hosting high attendance games on campus. What is not mentioned however, is that football games occur on clear streets in the fall of the year and that there are only about 6 home games. Football games were never included in SRT’s Traffic Study. For neighbors on the Shadow Falls side of campus these games are a significant disruption, caused by spectator traffic, parking and noise associated with football games. In fact, during games the narrow, winding streets in the neighborhood become unintentional one-way streets, clogged by cars entering from both ends. During football games even permit parking rules are ignored, and the City does not monitor permit parking after 5:30PM. This situation has only been tolerable to the neighborhood because there are so few football home games, and they are not held in winter. However, the seasons for hockey and basketball, the two primary sports to be played in the new arena, include the entire span of snowy winter months, in which driving and parking are anything but normal, even without the looming specter of on-street arena parking. The Transportation Study does not address one-side of the street parking in winter for example.</p>	<p>Thank you for your comment. The scope of the EAW analysis are the impacts of the proposed Arena, and most recently the Schoenecker Center, Microgrid Project, and SPS Parking Lot, so football was not analyzed as events are held in a different location on North Campus.</p>
<p>How can a traffic and parking analysis be accurate when it neglects the season of heaviest use and the season of most inclement weather? 2024 EAW Transportation Analysis Addendum (with Mitigation) MAP Figure A3 The map shows that even with Mitigation, congestion/queuing is expected to occur for 20-30 minutes prior to a capacity event. 6 intersections showing LOS of E – F. Under capacity events show minimal LOS at major intersections. But these events will still rely on residential streets and cruising spectators in search of elusive parking spots. The maps don’t reflect any impacts on the neighborhoods, each of which will become an extension of UST’s “available parking” strategy, reliant on routine use of residential streets.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Football games are the highest-attended events on campus and are discussed on Page 19 of the 2023 EAW Transportation Study. However, they were not evaluated or analyzed as part of the EAW, as they are not new events for campus and will not be held at the proposed arena. • Based on industry standard, traffic modeling does not account for snow events and/or emergencies. Snow events and/or emergencies could impact traffic operations and on-street parking. Much like Saint Paul residents need to react to snow emergencies and plan for parking differently than their normal practices, the University would need to plan for those events as well. • The study intersections analyzed as part of the transportation study were identified through discussions with UST and City staff based on the highest likelihood of usage during event periods. The event parking demand analysis, based on event type and attendance, is presented on Pages 15 and 16 within the 2024 EAW Update Transportation Analysis

Comment	Response
	<p>Addendum. For events where a parking deficit is expected, several mitigation strategies are recommended to reduce on-street public parking in the neighborhood and are summarized on Pages 17-20.</p>
<p>Other Events Rental events may comprise a majority of arena events off season. But the only mention of non-UST events in all 464 pages of the EAW taking place in the Multipurpose Arena is on (page 9 of the UST Multipurpose Arena EAW Transportation Study) under the heading Non-Athletic Events, where it is quickly dismissed. The primary scheduled, reoccurring use of the Arena is for basketball and hockey events and therefore this use was selected as the focus of the EAW transportation analysis. While other event types could have similar capacities, due to the infrequency and unknown nature of these events, they were not the focus of the EAW. To offer additional insight into potential events beyond UST athletics, the following summary provides an overview of other anticipated at the Arena. UST Commencements (6 sessions), High School Commencements, External Events, Career Fairs/Conventions, Youth Sports Practice/Games, Youth Sports Camps, Club Room Rentals In the list of potential “External Events” concerts are listed. Concerts in a center stage seating configuration have a capacity of 5,500-seats, end stage configuration has a capacity of 4,523 seats. These are all potential full-capacity events. Why would they not be included in the transportation study?</p>	<p>Thank you for your comment. As mentioned on Page 11 of the 2024 EAW Update Transportation Analysis Addendum, "Aside from a center-stage configuration, a maximum capacity external event is expected to operate nearly identical to a maximum capacity basketball event and would likely adopt similar mitigation strategies identified in this report. Due to the considerable uncertainty surrounding the possibility of hosting large external events, it was not the primary focus of the EAW. It is expected to be further explored as part of the EMP, when the feasibility and demand for such events becomes more evident"</p>
<p>Too many cars in too small a space describes exactly the situation with a 5,500-seat area on the UST south campus, in a residential neighborhood with extremely limited parking, no major thoroughfares, no trains, no parking and no bus transit hub.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>What no one in city government seems to question is the foundational basis for the studies in the University of St. Thomas Multipurpose Arena EAW; the scope and frequency of events at the arena. Long after the arena is completed, when D1 games routinely draw capacity crowds, the off-season is filled with concerts and other profitable rental events, the neighborhoods are overwhelmed with spectator’s cars looking for convenient free parking and boisterous fans, and the thoroughfares and intersections are gridlocked once a week, everyone will wonder how this arena in this location could possibly have been approved.</p> <p>I end my comments with one final question. What kind of city government defies the will of its own citizens in favor of a private, non-profit entity, one that pays no property taxes, while over-utilizing city services, an entity that erodes the city’s fragile tax base in one of its most desirable neighborhoods by defiling it, places long considered to be among the most livable in St Paul with private residences paying some of the highest property taxes in the city?</p>	<p>Thank you for your comment.</p>

Irene Suddard

Comment	Response
<p>An EIS is needed for the Anderson Arena! The Arena is not just a St Thomas building with impacts for the campus, it greatly impacts the neighborhood. UST acknowledges that traffic and parking will not be limited to the campus but will affect mobility and parking in the surrounding residential community. One of the parking solutions I read was to limit or “take away” residential parking permits. What?</p> <p>Whether in the area of run-off and greater potential erosion due to increased paving, increased idling of vehicles, vehicle back-up, the “heat-island” effect, the net elimination of 66 mature trees all of this plus, when you take into consideration the density of the recently constructed, projects currently under construction or soon to be constructed all on the South campus, you see a density of buildings (compared to even 5 years ago) that inevitably produce disruption and need to be thoroughly reviewed, assessed and approved for not only what is being done currently but what the long-term effects will be. A deeper EIS study is needed.</p>	<p>Thank you for your comment. Pages 17-20 and Table 10 of the 2024 EAW Update Transportation Analysis Addendum summarizes all mitigation strategies and improvements that UST has committed to, have been required through the Site Plan Approval, or that have been recommended as part of the EAW process. Required mitigation is included in the Findings of Fact document as a component of determination regarding the need for an EIS.</p>

Patrick Summers

Comment	Response
<p>I have resided on Fairmount Avenue since 2010 (off of Cretin Ave.), and raised our family there. I am a life long resident of St. Paul, and the Mac Grove/Highland Park neighborhoods. I think that UST has been a good neighbor and steward of its campus, and an asset to the neighborhood. I think the revised EAW, from what I understand of it, properly and fully addresses the items noted by the MN Court of Appeals in its opinion. The report appears to be very thorough (more than I'd think necessary for an arena). I hope that the City approves the revised EAW, or whatever is the next step in the process.</p> <p>I think the new UST arena will be a great asset to the school, its students, the neighborhood, and St. Paul. It's great to see a University investing in the future. While I expect that the new facility may have some effect on the neighborhood, that is part of living in a vibrant and growing city. Change is necessary to continue to attract people and investment to St. Paul. UST is building on its own land, with its own resources. I suspect that a good percentage of UST students learn about St. Paul while at school, and decide to live here.</p>	<p>Thank you for your comment.</p>

Christine Sweet

Comment	Response
<p>As a resident of St. Paul, I find numerous instances in it of inadequate responses to citizen concerns re: environmental and liveability impact on the surrounding community. An EIS is needed.</p> <p>Among these instances are that UST claims no incompatibility with nearby land uses. As a result, the EAW specifically states that no measures are incorporated into the project to mitigate any incompatibility or any risk potential.</p>	<p>Thank you for your comment. Land use and zoning are discussed in Section 10 of the 2024 EAW Update.</p>

Dave Ulve

Comment	Response
<p>What follows are concerns and comments: -recent Villager article stated arena will create new economic opportunities for the community. I might be missing something but HOW? It is not like the Xcel Center which has restaurants and bars within close proximity. -use of remote parking sounds good but common sense tells me people are going to want to park as close as they can. And that means they will park in the neighborhood. One suggestion was to use lots around Allianz. Will these lots be available long term given planned development for that area? Another suggestion was using mass transit. How many people will walk from University Avenue to the arena in the winter? The arena will definitely benefit the student experience but at what expense to homeowners. I read awhile back the UST student council president said to the homeowners at a joint meeting "if you don't like it move". My reaction to that was WOW!</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Event management plans are living documents that are continually updated and refined based on real-world experiences and feedback. If there is a future change in remote parking areas, UST will work to provide a new remote parking area and update the EMP accordingly. • While no proposals have been received, there are long-term plans to redevelop the Allianz Field surface parking lots. If this parking were redeveloped and no longer available for UST shuttle services, alternative off-site parking locations would be identified. • There are no expectations that event patrons would arrive to an event using LRT and/or walking from University Avenue. However, some users are expected to utilize the Metro Transit Bus routes 21, 63, and 87, which have stops near the area along Cretin, Grand, or Cleveland Avenue. (see image on Page 6 of the 2023 EAW Transportation Study for bus stop locations). Please note that route 21 no longer provides a stop at the Cretin Avenue/Summit Avenue intersection but continues to provide stops along Marshall Avenue.

Kelly Vinson-Taylor

Comment	Response
<p>1) The original traffic study was completed in March of 2023 and was not updated for the second EAW. Living one block away from campus on Dayton (between Finn & Cretin), I can attest that traffic has significantly increased over the last 20 months since that traffic study occurred. There have been more car, bike and pedestrian accidents reported on Citizen app in the areas surrounding campus, numerous student rentals have been torn down and turned into duplexes increasing car and foot traffic, and St. Thomas just publicly stated in the last week that they "welcomed the second-largest undergraduate class in two decades which is a 4% year-over-year increase, helping to propel St. Thomas' total student population to a four-year high of 9,445." which adds to the amount of traffic coming and going from campus.</p>	<p>Thank you for your comment. The mitigation plan outlined in the Findings of Fact requires ongoing monitoring and traffic safety measures. The Event Management Plan is considered a living document and will be modified as needed based on attendance, traffic, and parking data gathered during the monitoring period.</p>

Comment	Response
<p>2) The compounding effect of the number of home athletic events occurring on the same days and across campus is not being accounted for in the EAW. All these events will impact traffic and parking in the area especially when they are held at the same time or within a few hours of each other. Take these 3 days for example (11/7 - 11/9). 11/7- Women's basketball 7pm, 11/7 - Women's Hockey 7pm, 11/8 - Women's Hockey 2pm, 11/8 - Men's Hockey 7pm, 11/9 - Men's & Women's Swim & Dive 11am, 11/9 - Football 1pm.</p>	<p>Thank you for your comment. The 2024 EAW Update Transportation Analysis Addendum acknowledged that simultaneous events at the Schoenecker Center Performance Hall alongside larger events at the Arena are expected to further increase congestion and potential parking deficits on campus, and recommended to avoid scheduling other on-campus events in any space on campus that would attract non-student/staff visitors who require on-site parking during events held at the Arena with attendance of 2,100 or greater. The 2024 EAW Update Transportation Analysis Addendum properly analyzed the impact of concurrent events on campus and established an operational parameter at which such events should not be scheduled.</p>
<p>3) With UST's move to the NCHC conference for hockey, they will play teams from Minnesota Duluth, St. Cloud State, and North Dakota and with those institutions within driving distance of the Twin Cities and being the premier hockey conference, they will draw more fans to the arena then in their existing conference. Again, this will have greater impact on parking and traffic.</p>	<p>Thank you for your comment. The projected attendances changes expected as a result of the UST men's hockey team joining the NCHC is documented on Pages 11 and 12 of the 2024 EAW Update Transportation Analysis Addendum. For the purpose of the event parking demand analysis, all men's hockey games were assumed to be maximum capacity events. The event operations analysis, which was updated from the 2023 Transportation Study, is based on a worst-case maximum capacity basketball event (i.e. 5,500 attendees).</p>
<p>4) While UST has analyzed the parking on their campus, the EAW has not done a recent and thorough review of the Parking availability in the neighborhood. The lack of parking on our street has gotten noticeably worse since students returned to school this fall. I can attest that on any given weekday evening and on weekends, our block of Dayton from Finn and Cretin has approx. 3 to 5 parking spots available on the entire block. I know this because when my husband returns home from work after 8pm on weekdays and weekends when parking permits are not required, he struggles to find a spot to park. If that limited availability of parking is expanded to other surrounding blocks, it's hardly enough to accommodate the deficit of on-campus parking the arena will create.</p>	<p>Thank you for your comment. Parking counts on and immediately adjacent to the UST campus, as shown in Figure 1 within the 2024 EAW update Transportation Analysis Addendum, served as the foundation for the EAW parking analysis, based on the scope developed in collaboration with UST and City staff.</p>

Donn Waage

Comment	Response
<p>6 - Project Description</p>	

Comment	Response
<p>First, the Project Description in the revised EAW has been expanded to include not only the arena but the Schoenecker Center, the Center for Microgrid Research and the proposed St. Paul Seminary Parking Lot. The parking lot was apparently added to the Project Description to moderate the overall project's parking impact. However, the new parking lot is fully in the Mississippi River Critical Corridor Area. There is no awareness in the new EAW that this is not simply an extension from 6 to 11.7 acres but into a much more significant environmental impact area. In particular, the parking lot is within the largest migratory bird corridor in the United States. Further, although the project now includes Schoenecker and the EAW acknowledges that events occur there, the only recommendation in the EAW is to "avoid" having events on sports nights. [Interesting that sports take precedence over any educational activity on campus].</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The SPS Parking Lot project was added to the project scope as it is a known, nearby project. • St. Thomas' South Campus parcel is within the Mississippi River Corridor Critical Area in addition to the SPS Parking Lot project. The Mississippi River Corridor Critical Area is discussed in Section 10 and Section 16. • As noted in Section 14 of the 2024 EAW Update, Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW. • Events held within the Schoenecker Center are outlined on page 5 of the 2024 EAW Update Transportation Analysis Addendum.
<p>18 - Greenhouse Gas Analysis</p>	

Comment	Response
<p>Second, the Court of Appeals stated, “the project will increase the number of spectators traveling to the St Paul campus by moving the hockey program and events there. By overlooking how spectator travel would impact the project’s GHG emissions, the city “entirely fail[ed] to address an important aspect of the problem. See Friends of Twin Lakes, 764 N.W. 2d at 381. The city’s determination that the project does not have the potential for significant environmental effects due to spectator transportation is therefore, arbitrary and capricious.” (page 16)</p> <p>UST addressed only a modest portion of the Court’s concerns in the new EAW. UST did provide a rough estimate of “non-student cars” based on the locations of its current season ticket holders. The UST estimate totaled 1,037,339 car miles per season producing 341.85 MTeCO2. Even this massive estimate did not include GHG produced by:</p> <ol style="list-style-type: none"> 1. student transportation to games (20% of projected attendance) 2. other transportation modes, such as Uber, shuttle buses and Metro Transit used by students and non students 3. travel of opposing teams to St Thomas games 4. travel of fans of opposing teams to the St Thomas games 5. events such as those described in the 2024 Transportation Analysis page 10 <p>The arena construction is a part of a deliberate strategy for UST to become more nationally known. That strategy not only has positive PR implications for St Thomas but has negative consequences for GHGs. The Court did not limit “spectator travel” to only St Thomas fans within the Twin Cities area. Having an opposing team is a necessity in sports and some opposing fans attending are highly likely. By choosing to join D1, and now moving to a more notable hockey conference, UST will be playing teams from all across the country rather than just the Upper Midwest—involving much more travel. In 2023’s Mankato Motor Sports case, (A-23-0091) the Court of Appeals considered the proposed creation of a motorsports park. In denying the EAW they stated, “the supplemental EAW did not consider whether the project would increase air travel to and from the Mankato Regional Airport and therefore did not include emissions from air travel in its emissions estimate.” (page 7)</p> <p>UST and the city have done an inadequate job of assessing the carbon emissions produced by their choice to engage in a more competitive level of sports.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The GHG Vehicle Emissions Analysis was completed to document the change in vehicle emissions for spectator travel to the new Arena per the Court of Appeals Opinion. • St. Thomas currently plays hockey in Mendota Heights. The students attending hockey games in Mendota Heights would have a further distance to travel from the St. Thomas campus to Mendota Heights than they would walking to the new Arena which is located on campus. There would actually be a net decrease in travel distance for students attending the new Arena on campus than the travel distance of attending events in Mendota Heights. To be conservative, that decrease was not deducted from the vehicle miles traveled within the spreadsheet. • St. Thomas currently plays basketball on their St. Paul campus within another building. Therefore, there is no change in vehicle travel for students attending the new Arena vs the other building. • All non-student seats were incorporated into the Appendix C calculations without deducting the modal split assumptions (people who will take alternative means of transportation such as bus, walking, biking, etc.) listed in Table 10 on Page 24 of the 2023 Transportation Study to provide a conservative calculation. • The 2024 EAW Update notes that vehicular traffic for visiting teams are not analyzed as this travel already occurs to the existing venues where St. Thomas athletic events are held and there will not be a resulting increase in such travel from the Arena. • Non-athletic events held on campus are anticipated to be similar to the non-athletic events held today on campus, thus not increasing vehicle GHG emissions.
20 - Transportation	

Comment	Response
<p>Third, in its July 8 opinion the Court of Appeals totally rejected the original EAW’s claims of mitigation, “we conclude that the [mitigation] measures are not specific, targeted, and certain. The city must address the noted shortcomings on remand.” (page 21). I describe below that the shortcomings of the September 26, 2023 EAW have not been repaired but persist. The revised Transportation Analysis (TA) has found many changes since the original TA in 2023. On page 2 it notes that “Enrollment on the campus has seen a decline over the past decade but has stabilized...” That statement contrasts with the UST Newsroom website which states shows increases as follows:</p> <p>+17% New transfer students + 4% First time students + 7% Graduate students</p> <p>The point is not that enrollment has increased but that UST’s goal is to increase enrollment and creating the arena is part of that effort. It is likely that enrollment will continue to increase.</p> <p>The new EAW also suddenly found more parking spaces on campus. It also found that claims in its original EAW statement on the need for a 5 to 15% surplus of parking does not apply to events. (Notably there is no explanation as to why the 5 to 15% rule does not apply to events.) The new EAW also found that the number of hockey fans would be significantly greater than originally expected because they will be playing in a more notable conference. Even with all these changes the new EAW has found that parking remains no problem.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • In recent years, enrollment at St. Thomas dropped from a high of 10,245 total undergraduate and graduate students in 2015 to 9,061 in the Fall of 2022. This year, enrollment is 9,400 total students (6,300 undergraduate students and 3,140 graduate students). This includes students enrolled in classes in St. Paul, Minneapolis and online. • While this represents a slight increase in enrollment, there continues to be a change in the mix of students, the primary mode of their degree programs and the geographic location of their studies, resulting in negligible changes to the number of students attending classes on the St. Paul campus. • More students are attending classes online, including programs in data science and A.I. In addition, much of the program and enrollment growth St. Thomas is experiencing impacts students attending classes on the St. Thomas Minneapolis campus. • While St. Thomas estimates modest increases in overall enrollment, there will continue to be changes in the modes of delivery and slight increases in undergraduate enrollment are estimated to have a negligible impact on the St. Paul campus. • Because it is estimated that the vast majority of students attending games will walk to games, any projected increase in enrollment will have a negligible impact on event traffic and parking. • As mentioned on Page 7 of the 2024 EAW Update Transportation Analysis Addendum, "during event conditions, common practice involves implementing strategies to fully utilize parking supply." Page 7 also identifies two strategies that are planned and/or recommended to help reduce the circulation of vehicles in the project area. • A parking demand analysis was completed for maximum hockey events (4,000) under both the 2023 and 2024 EAW transportation studies. While the 2024 EAW Update Transportation Analysis Addendum documented that the change to the NCHC is expected to result in more men's hockey maximum capacity games, the capacity of the arena has not changed.

Comment	Response
<p>The revised EAW still does not look at the impact of the arena on the neighborhoods. The mitigations suggested are all mitigations for itself—UST—essentially improvements in its product rather than reducing impacts on others which is the essence of mitigation. St Thomas’ so-called mitigation efforts in parking are all efficiencies to ensure there is more campus parking and happy fans (customers) for its sports--pre- paid parking, easier egress from parking lots and smoother exits off campus.</p> <p>Car parking for event attendees is not the only impact beyond the campus that has been ignored (noise, congestion, trash) but it is the simplest to assess. The revised estimate of parking spaces on campus and on parking along public streets bordering UST is still leaves a shortage of up to 770 spaces. There are several problems with this. The only real option to the parking problem is to do what UST habitually does and dump its problem on its neighbors. UST is essentially claiming control over the parking spaces along its bordering streets and now proposes to extend that control into the neighborhoods. However, UST does not own or control parking on streets bordering its campus and UST does not own or control parking in nearby neighborhoods. Its control is exercised through the acquiescence of the city.</p>	<p>Thank you for your comment. These mitigation strategies "such as pre-paid parking, easier egress from parking lots and smoother exits of campus", not only benefit the event user but also make campus parking more desirable, which may help deter users from parking in the neighborhood.</p>
<p>The UST arena will create a significant problem for the residents of local neighborhoods. UST has for many years disowned its external impacts. That is why almost all on-street parking within ½ mile of the campus is city permit parking. The Transportation Analysis (TA) of both EAWs are focused on proving there is parking on-campus to accommodate arena fans. Well actually on-campus and also on streets bordering UST, which it counts as its own property. But fans are not interested in seeking that last parking space on campus. I would say that is the flaw in their reasoning except I believe they are well aware that there is little or no benefit for fans to park on campus. The fan wants to park for free and with minimum hassle. To most fans parking in the neighborhoods would be the preference, not a fall back. Both the 2023 and 2024 TAs include maps showing campus parking within ½ mile of the arena. Both maps (see Figure 1, 2024 TA) also include (in very light type) an estimated number of City Permit Parking spaces, totaling 1,715 (Note; perhaps only half of these spaces are actually within a half-mile of the arena). The TAs include no written mention of these parking spaces presumably waiting to be occupied. But the 2023 TA states that fans are willing to walk up to one half mile to a game. Although they fear to say it, clearly UST plans to drop its arena parking problem on the neighborhoods.</p>	<p>Thank you for your comment. Refer to Page 17 of the 2024 EAW Update Transportation Analysis Addendum for details on how the pre-paid event tickets and parking assignments are expected to operate. Event patrons will be issued a designated parking pass for a specific location in advance, which should help alleviate the need for patrons to search for parking. Additionally, based on initial project discussions, these parking passes are expected to be provided at no cost to event attendees. UST will notify event patrons that they may be ticketed and towed if they park illegally on neighborhood streets.</p>

Comment	Response
<p>Because UST fears to openly discuss dropping arena parking on the neighborhoods no one has studied the issue. UST assumes neighborhood parking is boundless. There has never been an assessment of the availability of parking spaces on nearby streets. UST assumes the local streets are available to them at all times. I have walked most of the nearby streets in the evenings and I think they are usually 30-40% occupied by cars. At public meetings proponents of the arena have stated that everyone in the neighborhoods have parking garages. That is not correct. Many people do not have garages, some people have 1 car garages and have two or three cars, other people have disabilities and access to the street is easier or essential. The neighborhoods have also experienced changes from the City's new zoning and housing policies. A new student housing duplex on Goodrich has filled half the block's south side with cars. There is a sober house on Fairmount that typically uses 4-5 spaces. These are just a couple of examples but highlight how UST and the City have carelessly disregarded the impact of arena parking on the neighborhoods. Fans are not likely to drive around the campus looking for spaces when they can simply park in a nearby neighborhood, even if they see a No Parking sign. Real mitigation would include a permit parking enforcement plan.</p> <p>Because UST fears the results, there is also no study on the impacts of its parking dump on the neighborhoods. As I mentioned above, many residents must park cars on the street. Most don't want to or cannot walk blocks to their home. People in the neighborhoods want to have guests, parties, receive deliveries and have health and safety emergencies—all are more complicated or impossible because of arena parking. Of course, due to the problems with current UST student parking, almost all parking within a half mile of the campus is city permit parking only (Monday-Friday 8:00 am to 8:00 pm). Most St Thomas games during the week start at 7:00 pm. How tempting for fans to park in these permit areas at 6:15 or 6:30 pm and risk a ticket. Why not, not much chance for a ticket and you get free convenient parking. UST and Saint Paul are both collaborating in encouraging people to violate city parking ordinances. Further, the city is calling into question the viability of all permit parking in the city and inviting a lawsuit.</p>	<p>Thank you for your comment. As part of the pre-paid ticket system, event patrons are expected to be informed in advance that campus parking is unavailable, on-street parking is limited, and neighborhood parking restrictions are in place with clear warnings about ticketing/towing.</p>

Comment	Response
<p>Real mitigation—limiting impacts on the neighborhoods—would be to insure parking enforcement in permit parking areas during prohibited times. There simply is no space for hundreds of cars to park during the week in the neighborhoods. And if there is space why should neighborhoods taxpayers absorb the inconvenience of suburban people parking here and going to a sports event for a nonprofit? What benefit is there for the city? For many people the lure of free on-street parking and not leaving the game from a full parking garage would tempt them to ignore the parking rules. By accepting parking limits on campus and not accessing neighborhood streets the city is encouraging spectator cars to break the law. Any real mitigation would limit the impact of arena parking on the surrounding neighborhoods. Why should neighbors absorb these impacts instead of UST which is building an arena for its own benefit?</p>	<p>Thank you for your comment.</p>
<p>The city repeatedly says that the final Certificate of Occupancy approval will be the time when mitigation is decided. As the Court pointed out, this is not Minnesota law. Mitigation should be part of the EAW so it can be assessed as part of the decision to approve the project. The city Zoning Committee, Planning Commission and City Council all stated the EAW was not relevant to their consideration of the arena Site Plan. In fact, the city attorney advised that none of these bodies could discuss the EAW with citizens because of its “quasi-judicial” nature. The City and UST have defied the Minnesota Court of Appeals and have faced no consequences. They have undermined Minnesota environmental law and so far have succeeded.</p>	<p>Thank you for your comment.</p>

Alice Wachter

Comment	Response
<p>I live at 2199 Sargent and am negatively impacted by the building of this huge arena in a very small area. One of my greatest concerns is for the health of the Mississippi River and the environment. With this in mind it is my opinion that St Thomas's EAW is incomplete and insufficient. Perhaps the EAW loosely met the 'minimum' required (initial EAW and the revised EAW). But we can't go with the 'lowest' bar when an arena so large (with chemicals in it) is being built so NEAR the Mississippi. Responsible parties and those that approve such studies should rise to a higher bar....not only the "letter of the law" but the spirit of the law. Bottom line Protect the Environment with the most thorough and complete study. Clearly this project demands an EIS.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>Points of Major concern: * Statements in the EAW by St Thomas saying "No outstanding resource value waters are located with one mile of the project" are quite concerning. The Mississippi River is a value water and a national treasure. The river is way closer than one mile. Drainage into the river due to impervious surfaces will increase. The potential danger (disaster) from a ice rink chemical leak must be considered and evaluated thoroughly through an EIS.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Designated Outstanding Resource Value Waters are listed in Minnesota Rule 7050.0335. As noted in Section 12 of the 2024 EAW Update, the Mississippi River is located approximately ¼ mile west of the project site. This segment of the Mississippi River is not included on the Outstanding Resource Value Waters list. • Section 13.c, starting on page 37, lists the approximate number of chemicals/materials expected in the Arena and measures to avoid, minimize, and mitigate adverse effects of the materials.
<p>*Loss of trees: significant loss of trees in the area where birds fly with no replacement trees slated for the South Campus.</p>	<p>Thank you for your comment. The City of Saint Paul advises on landscaping, including trees, during permitting approvals. Although there is no requirement that trees be replaced in the same location, the 127 proposed trees listed in Table 5 of the 2024 EAW Update are all proposed to be planted within UST's South Campus parcel or within the SPS property.</p>
<p>* more cars, more vehicles, more buses certainly impact the traffic flow and safety but their increased numbers also have the potential to dramatically impact the air quality and environment. I feel none of these issues were clearly and precisely addressed in the EAW. with mitigation strategies included. Therefore an Environmental Impact Statement should be done.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Traffic generation and safety are addressed in Section 20 of the 2024 EAW Update. • Assessment of traffic-related vehicle emissions is included in Section 18.b.iii.

Michael Wachter

Comment	Response
<p>I live at 2199 Sargent and am negatively impacted by the building of this UST arena in our neighborhood. One of my greatest concerns is for the health of the Mississippi River Valley and our neighborhood environment. With this in mind it is my opinion that St Thomas's EAW is incomplete and insufficient. Perhaps the EAW loosely met the 'minimum' required. But we can't go with the 'lowest' bar when an arena so large is being built so NEAR the Mississippi. Responsible parties and those that approve such studies should rise to a higher bar....not only the "letter of the law' but the spirit of the law. Bottom line: Protect the Environment with the most thorough and complete EIS study. Clearly this project demands an EIS. "Net loss of 66 mature trees 193 will be removed for Arena, Schoenecker, Microgrid, and Seminary parking. 127 will be replanted, although not necessarily on South Campus. " "Only the South Campus is in the Important Bird Area and the Mississippi River Corridor Critical Area, so elimination of trees here and planting them elsewhere is a serious loss to an ecologically fragile site. The effect of this loss of habitat has not</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • The City of Saint Paul advises on landscaping, including trees, during permitting approvals. Although there is no requirement that trees be replaced in the same location, the 127 proposed trees listed in Table 5 of the 2024 EAW Update are all proposed to be planted within UST's South Campus parcel or within the SPS property. • As noted in Section 14 of the 2024 EAW Update, Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW. The Mississippi River Corridor Critical Area is discussed in Section 10 and Section 16.

Comment	Response
<p>been studied. The city should not accept any environmental review that does not analyze the effect of this habitat loss of 193 trees on migratory and non-migratory species."</p> <p>UST should, in fact, be planting many more trees on their property to account for increased CO2 load produced by the traffic and environmental effects of the entire construction process and altered traffic patterns. One estimate, (Penn St. Univ, Dept of Environ. Studies) is that it would take 730 new trees planted to offset the carbon footprint of a single internal combustion car in use for a single year. Thus, the increase in car traffic associated with the new UST athletic facilities alone would require the planting of thousands of trees each year in a very limited space. Perhaps UST should look at funding tree-planting projects, if not in the immediate neighborhood, but in nearby metro parks.</p> <p>This is one simplistic approach to addressing the environmental concerns of the proposed UST project, but as a retired biochemist/microbiologist, I feel very comfortable with looking at all kinds of data and consequences of our actions on the existing environmental decisions in a rational analysis. We must be responsible guardians of our environment !</p>	

Carol Walsh

Comment	Response
<p>The City of St. Paul has allowed the University of St. Thomas to continue building the arena despite the adjudicated inadequacy of the 2023 environmental assessment worksheet (EAW); therefore, in my view, opportunities to change the project to mitigate its environmental impact have been lost. The City should stop the construction until this environmental review process is completed. That would allow consideration of project elements with less environmental impact.</p> <p>Respect for Minnesota's laws governing environmental review requires St. Paul to stop building the arena immediately before opportunities for mitigation are lost. By stopping the project, St. Paul has the chance to ensure that UST focus development on what is sustainable, not what will get the university to Division 1 status the fastest way. Applying the law requires St. Paul to either require an environmental impact statement, or require a complete EAW before moving forward with its environmental review decision, or order an EIS based on the fact that the project as designed has the potential for significant, deleterious environmental impacts.</p>	<p>Thank you for your comment. There are no court orders requiring St. Thomas to stop construction. The Court of Appeals issued an Opinion requiring an updated EAW, which the 2024 EAW Update was created to address.</p>

7 - Climate Adaptation and Resilience

Comment	Response
<p>Regarding energy sources: The City should require UST to consider clean energy sources as alternatives, including using the building roof to support a solar energy generation station, or using more-efficient geothermal energy. As a newly built facility, there is no reason why UST could not design without relying solely on natural gas and other fossil fuels.</p>	<p>Thank you for your comment. The project is evaluating ways to meet the University’s sustainability goals through the design of the project. The Arena has been designed to support potential future solar panel installation.</p>
<p>Regarding LEED certification: Silver LEED certification, which UST expects the arena to receive, is a relatively low level of environmental commitment. Other, arena projects have done much better, as a Google search will show. LEED Platinum certification, the highest level of LEED certification, represents a commitment to sustainability and environmental leadership. The City should require large educational institutions, particularly those that assert community, integrity and the common good, to meet the highest standards of environmentally-sensitive development.</p>	<p>Thank you for your comment. As noted in Section 7 of the 2024 EAW Update, the Arena is seeking LEED-Silver accreditation and a LEED credit for Heat Island Reduction by using high-reflectance roof materials on the flat roofs of the building. While not currently required for a privately funded project, this is consistent with the goals of the City’s Climate Action and Resilience Plan.</p>
<p>12 - Water Resources</p>	
<p>Regarding water quality and other impacts from new surface parking: UST describes the 73-stall surface parking lot as an action connected to the arena project that increases the impacted area to 11.7 acres (revised EAW). MISSING from the current EAW: It does not state that the need for this project is created by the loss of seminary parking spots due to the arena development (pg. 8). MISSING from the current EAW: Discussion of the impact of the loss of more than 190 mature trees (lost to the developments), while only 127 will be replanted (pg. 17-18), a permanent loss of 63 mature trees, while the replanted trees will take over 30 years to provide the benefits of shade and habitat. Although the new parking area will be required to obtain a stormwater construction permit from the state, the revised EAW is MISSING a description of how stormwater from the slope that drains to this area will be managed. The stormwater generated from the parking area surface ("asphalt over an aggregate base") will apparently be directed to a pervious pavement area near stone columns, and from there discharged, without treatment, to the groundwater. There seems to be an assumption that this discharge will have no impact on the bluff’s stability or the quality of the groundwater or surface water. Increased vehicle noise and traffic to a scenic parkway area heavily used by bikers and pedestrians will result from the addition of the new parking lot.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> As noted in the Introduction of the 2024 EAW Update (page 2), the University of St. Thomas and Saint Paul Seminary are separate legal entities and SPS owns the land upon which SPS is seeking to build additional parking. As noted in Section 6.e. of the 2024 EAW Update (page 9), the SPS Parking Lot would provide additional parking supply to St. Paul Seminary School of Divinity students who would otherwise park in/on UST parking facilities. The stormwater treatment proposed for the SPS Parking Lot project includes pervious pavers to infiltrate the stormwater runoff into the underlying soil. Stormwater runoff rate will be decreased from existing conditions, as required through the City of St. Paul and Capitol Region Watershed District’s stormwater management regulations. This is discussed in Section 12.b.ii of the 2024 EAW Update starting on page 32.
<p>16 - Visual</p>	

Comment	Response
<p>MISSING: Light impacts are not addressed in the EAW at all. (Based on statements made elsewhere, however, construction plans appear to include tall lighting fixtures that will disrupt the natural appearance of historic Summit Avenue and the Mississippi River parkway and impact light sensitive organisms that inhabit the natural area.) The WWI monument area is a darker area within the area of urban light pollution. Without mitigation, the new parking area has the potential to significantly impact the nighttime environment. MISSING from the EAW: Detailed information on the impact on the bluff from the surface parking lot; stormwater, lighting, and view from the parkway and from the cumulative impacts of mass parking in a sensitive, historic area.</p>	<p>Thank you for your comment. As indicated in Section 16 of the 2024 EAW Update, the proposed project will conform with the City's regulations for lighting. Fixture modeling and photometric analysis have been completed for all site and building lighting to analyze light levels for the project. Additionally, the University standard for site lighting is to use LED cut-off light fixtures with a maximum nominal color temperature of 4000K. Finally, the Arena project is seeking a Lighting Pollution Reduction credit as a part of the LEED Silver rating for the project. This credit focuses on uplight and backlight & glare, including light she across the property line.</p>

Theresa Walls

Comment	Response
7 - Climate Adaptation and Resilience	
<p>The removal of almost 200 trees for buildings, microgrid and parking affects the important Bird Area and the Mississippi River Corridor Critical Area. Replanting trees in other areas does not mitigate this problem.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The City of Saint Paul advises on landscaping, including trees, during permitting approvals. Although there is no requirement that trees be replaced in the same location, the 127 proposed trees listed in Table 5 of the 2024 EAW Update are all proposed to be planted within UST's South Campus parcel or within the SPS property. As noted in Section 14 of the 2024 EAW Update, Important Bird Areas are a voluntary and non-regulatory part of an internal conservation effort to bird populations. This was added per recommendation from the MN DNR during the 2023 EAW. The Mississippi River Corridor Critical Area is discussed in Section 10 and Section 16.
20 - Transportation	
<p>EAW does not even mention Summit Avenue or the Mississippi River Boulevard and the effects that the UST development will have on them. This traffic onto Summit Avenue will clash with the bicycle lane on Summit Avenue which is planned to become a regional trail.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> The transportation analysis included four (4) study intersections along Summit Avenue, and two (2) study intersections along Mississippi River Boulevard. Traffic control officers are expected to be implemented at Cretin Avenue/Summit Avenue during larger events. For all other Summit Ave/Mississippi River Boulevard intersections, operations are expected to function acceptably during both events and general commuter peak hours. The public visioning of Summit Avenue was discussed on Page 6 of the 2023 EAW Transportation Study, and a future modifications to bicycle lanes would be planned separately from vehicular travel lanes.

Comment	Response
<p>The problems with so much street parking in residential neighborhoods, since UST is not providing adequate campus parking, and increased traffic on narrow residential streets has not been adequately addressed. The EAW does not address how often the arena will be used for events other than basketball and hockey games and resulting effects on parking and traffic. It appears that UST will use the arena as a money maker by hosting non university events, at the expense of the neighborhood. Non Student attendance at games has not been addressed.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • Pages 17-20 of the 2024 EAW Update Transportation Analysis Addendum show recommended mitigation measures. Required mitigation is included in the Findings of Fact document as a component of determination regarding the need for an EIS. • Pages 9-11 of the 2024 EAW Update Transportation Analysis Addendum outline an overview of other anticipated activities at the Arena, including projected attendance numbers and event frequencies. Most events and activities are expected to have attendance levels manageable within the existing campus traffic and parking infrastructure. Several of these events, such as UST commencements, career fairs/conventions, and youth camps, are already held on campus and are often limited to a few days or weeks each year. If the attendance of any event reaches certain thresholds, mitigation strategies similar to those planned for UST athletic events will be implemented. • Non-student modal split assumptions are documented on Table 10 of the 2023 EAW Transportation Study, whereas overall (basketball capacity from 5,500 to 5324) and student seating (22 to 20 percent) updates have been provided on Page 10 of the 2024 EAW Update Transportation Analysis Addendum.
<p>There is no consideration of traffic that can be expected to increase on Cretin Avenue, a major access street for I 94, as the huge Highland Bridge area is built out with many thousands of new residents, customers and employees.</p>	<p>Thank you for your comment. As noted on Page 29 of the 2023 EAW Transportation Study, Future Highland Bridge Traffic was accounted for, as stated on Page 29 of the Transportation Study "Year 2025 no build volumes were developed by both applying a background growth rate of 0.25 percent to the existing pre- and post-event volumes and included trip generation estimates for the Highland Bridge development."</p>
<p>The expected increase in undergraduate enrollment of 1000 students has not been included in the EAW. There is no indication that dorm space will increase so it has to be assumed that the increased students will commute and therefore add to the traffic and lack of parking.</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> • In recent years, enrollment at St. Thomas dropped from a high of 10,245 total undergraduate and graduate students in 2015 to 9,061 in the Fall of 2022. This year, enrollment is 9,400 total students (6,300 undergraduate students and 3,140 graduate students). This includes students enrolled in classes in St. Paul, Minneapolis and online. • While this represents a slight increase in enrollment, there continues to be a change in the mix of students, the primary mode of their degree programs and the geographic location of their studies, resulting in negligible changes to the number of students attending classes on the St. Paul campus. • More students are attending classes online, including programs in data science and A.I. In addition, much of the program and enrollment growth St. Thomas is experiencing impacts students attending classes on the St. Thomas Minneapolis campus.

Comment	Response
	<ul style="list-style-type: none"> • While St. Thomas estimates modest increases in overall enrollment, there will continue to be changes in the modes of delivery and slight increases in undergraduate enrollment are estimated to have a negligible impact on the St. Paul campus. <p>Because it is estimated that the vast majority of students attending games will walk to games, any projected increase in enrollment will have a negligible impact on event traffic and parking.</p>

Alan and Janet Wilebski

Comment	Response
<p>Some months ago, we wrote to the City about our very serious concerns about the UST proposed arena. Obviously, UST has received a go-ahead to build as the structure is in a very advanced stage of completion.</p> <p>Nonetheless, a full Environmental Impact Statement is needed from UST. The court invalidated their first submission and the second one is full of omissions and lack of a complete assessment.</p> <p>The surrounding neighborhoods are residential with families/children. The Mississippi River area is directly impacted by the construction and ultimate use of the arena.</p> <p>As long time residents of the area and constituents, we request that the Council insist on a full and adequate EIS from UST.</p>	<p>Thank you for your comment. There are no court orders requiring St. Thomas to stop construction. The Court of Appeals issued an Opinion requiring an updated EAW, which the 2024 EAW Update was created to address.</p>