

Pioneer Trail Industrial Park Environmental Assessment Worksheet Notice of Decision

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Record of Decision

Based on the EAW, the Response to Comments and the Findings of Fact, the City of Corcoran City Council concludes the following:

1. All requirements for environmental review of the proposed project have been met.
2. The EAW and the development processes related to the Project have generated information which is adequate to determine whether the Project has the potential for significant environmental effects.
3. Areas where potential environmental effects have been identified have included proper mitigative responses to be included within the final design of the Project. Mitigation will be required to be provided where impacts are expected to result from Project construction, operation or maintenance. Mitigative measures will be required to be incorporated into project design, and have been or will be coordinated with state and federal agencies during the applicable permit process.
4. Based on the criteria in Minnesota Rules part 4410.4300, Subpart 14, the Project does not have the potential for significant environmental effects.
5. An Environmental Impact Statement is not required for the proposed Pioneer Trail Industrial Park development project.

Response to Comments

The Pioneer Trail Industrial Park discretionary Environmental Assessment Worksheet (EAW) was approved for distribution to the Environmental Quality Board (EQB) and persons and agencies on the official EQB distribution list in accordance with EQB rules on March 29, 2022. The EQB published notice of availability in the *EQB Monitor* on April 5, 2022. The 30-day comment period ended on May 5, 2022. The City of Corcoran received four EAW comment letters or emails. The letters and emails are on file at the City of Corcoran.

The following comment letters were sent to the City of Corcoran:

Letter 1: Hennepin County Public Works - Email dated April 25, 2022 from Jason Gottfried, Transportation Planner and Karen Galles, Environment and Energy to Kendra Lindahl, City Planner

Letter 2: Minnesota Pollution Control Agency - Letter dated April 28, 2022 from Karen Kromar, Planner Principal, Environmental Review Unit, Resource Management and Assistance Division to Kendra Lindahl, City Planner

Letter 3: Metropolitan Council - Letter dated May 5, 2022 from Angela Torres, Manager, Local Planning Assistance to Kendra Lindahl, City Planner

Letter 4: Minnesota Department of Natural Resources - Letter dated May 5, 2022 from Melissa Collins, Regional Environmental Assessment Ecologist, Ecological and Water Resources to Kendra Lindahl, City Planner

The following information and clarifications are provided in response to all EAW comments received during the 30-day comment period. Comments are provided in italicized text.

Letter 1: Hennepin County Public Works

Comment 1: *Pg 5, Table 4: Significant land cover proposed as lawn, landscaping and pavement - Hennepin County encourages the proposer to reach out if they have interest on partnering to improve environmental outcomes from these cover types.*

Response: Thank you for your comment. The City will inform the Proposer of Hennepin County's interest in partnering to improve environmental outcomes.

Comment 2: *Pg 8 and 9: City ordinance and state law require that project proposers make an effort to avoided and minimize impacts to ALL wetlands before they can be permitted. What has the proposer has done to avoid and minimize wetland impacts?*

Response: It is understood that the City's ordinance and state law require that proposers consider opportunities to avoid and minimize all wetlands. The Proposer considered opportunities to avoid wetlands where feasible. The Proposer sited buildings within the industrial park to entirely avoid Wetland 1 and Wetland 2, and to minimize impacts to Wetland 3 and Wetland 4. The EAW conservatively indicated that the Project would potentially impact Wetland 3 and Wetland 4. Impacts to Wetland 3 will be minimized to the extent possible during the development of the final design and permitting process. The potential to avoid or minimize impacts to Wetland 4 will be considered as the final design develops.

For the purposes of the EAW, potential wetland impacts were estimated conservatively. It is anticipated the wetland impacts will be reduced during the development of the final design and permitting process. It is not anticipated that complete avoidance of wetland impacts will be feasible, however, wetland mitigation for unavoidable wetland impacts will be provided in accordance with all State and local regulations.

Comment 3: *Pg 11, Table 9: Hennepin County Environment & Energy Division has some financial resources to contribute to plan improvements (above regulatory requirements) that might benefit Jubert Lake or Peter Lake (both of which are included in the boundaries of subwatersheds that are currently priorities for water quality improvement).*

Response: Comment noted. The City will inform the Proposer of the potential financial resources available through Hennepin County.

Comment 4: *Pg 15: What are receiving waterbodies to which those existing wetlands and road ditches drain? Need to know this in order to fully understand impact on nearby water bodies.*

Response: Delineated wetlands within the Project Area are isolated wetlands, based on the Environmental Protection Agency's (EPA) 2020 Navigable Waters Protection Rule (33 Code of Federal Regulations 328) defining Waters of the United States (WOTUS). Isolated wetlands are defined as lacking any surface water connection to other waterbodies and/or wetlands. As such, the proposed minor impacts to Wetlands 3 and 4 are not expected to have impacts on waters downstream, since they are isolated water features.

Wetland 1 and Wetland 2 extend offsite, sloping downhill to the north. Wetland 3 drains overland westward to Wetland 1. Wetland 4 drains to the south through a culvert under State Highway 55.

Comment 5: *Pg 18, Table 12: What alternatives have been considered to avoid impacts to wetlands 3 and 4? If wetland impacts are necessary, city ordinance expresses a preference for mitigation to occur within city limits. Hennepin County in its role on the WCA TEP also request mitigation as close to the site of impact as possible. If necessary, project proposer should explore options first within the City of Corcoran, then within Hennepin County, then in areas of the bank service area outside of those geographies.*

Response: It is understood that mitigation within city limits is preferred, and that Hennepin County will also request mitigation as close to the site of impact as possible.

Comment 6: *Pg 21: Given limited habitat in project area, Hennepin County encourages project proposer to preserve existing tree lines as part of their landscaping plan.*

Response: Based on the preliminary design, no buildings or paved areas are proposed that would directly result in the removal of the northern tree line.

Comment 7: *Pg 22: We appreciate preservation of existing tree line.*

Response: Comment noted.

Comment 8: *Pg 23: Given the large amount of planned landscaping for this project, Hennepin County encourages project proposer to consider habitat value (e.g. minimize turfgrass, include native plants and trees, etc.) when drafting landscape plans. These types of landscapes are also lower maintenance over the long-term.*

Response: Comment noted.

Comment 9: *Pg 32: Proposer should provide more information about alternatives considered to avoid 0.8 acres of wetland impacts.*

Response: As described in response to Comment 2, the Proposer considered opportunities to avoid wetlands where feasible. Buildings are sited to entirely avoid Wetland 1 and Wetland 2. The EAW conservatively indicated that the Project would potentially impact Wetland 3 and Wetland 4. It is anticipated that impacts to these wetlands will be further evaluated and reduced during the development of the final design, and any unavoidable wetland impacts will be properly mitigated.

Comment 10: *Pg 35: Does proposed concept/right-of-way consider sufficient public right-of-way along Highway 55 should future roadway expansion be necessary at some point. This has been considered in various previous Highway 55 studies. Question for MnDOT. This wetland in particular ("wetland 4" along Highway 55) has the potential to play a role in addressing downstream water quality impairments in Lake Independence, and is identified in a study prioritizing projects that is a collaborative effort between Hennepin County and the Pioneer-Sarah watershed management commission. If the project proposer would be willing to consider protection/restoration of this wetland these two entities would have technical and financial assistance to contribute to such a project. It appears that by adjusting "Lot 2" and the southern stormwater pond slightly, impacts to "wetland 4" could be avoided.*

Response: As discussed in response to Comments 2 and 9, the potential wetland impacts described in the EAW are conservative estimates. It is anticipated that actual impacts to Wetland 4 will be minimized and potentially avoided, which will be considered during the development of the final design and permitting process. If impacted, proper mitigation planning will occur.

Additionally, Wetland 4 is isolated, based on EPA definitions of WOTUS, meaning it is not connected via surface water to any other streams or wetlands. As such, impacts to downstream water resources will not be impacted.

Comment 11: *Pg 37: like to understand the drainage pathway between the project area and Lake Peter. If this project could help address that nutrient impairment through going above and beyond watershed requirements that would be valuable.*

Response: Stormwater runoff generated by the Project would drain to proposed stormwater ponds and roadway ditches. Wetland 4 drains to the south through a culvert under State Highway 55, but is considered an isolated wetland lacking surface water connection to other waterbodies and wetlands.

Comment 12: *Pg 42: Appears there is some existing gully erosion in the area of wetland 3 - assume the development plans will include stabilization of that area, but to the extent that impact to that area can be avoided and additional assistance is desired to help stabilize erosion*

in that area, Hennepin County is happy to provide technical and potentially financial assistance to do that.

Response: Comment noted.

Comment 13: *Pg 96: If project proposer has an interest in working with Hennepin County to restore some of the historic hydrologic connection between wetlands 1 and 3 on this site, this is something the county would be eager to discuss.*

Response: Comment noted.

Comment 14: *Pg 132: At some point in the future as this area redevelops, it may be prudent to have dedicated left, thru, and right-turn lanes along Pioneer Trail at the approach to CSAH 19.*

Response: Comment noted. It is anticipated that this intersection will be evaluated again in the future as this area redevelops.

Comment 15: *Pg 134, Traffic forecast intro: 20-yr growth forecast is recommended as a standard practice. This would be 2047 in this case (projected build complete 2027).*

Response: Traffic forecasts were developed using information from the City of Corcoran's Comprehensive Plan, which includes year 2040 traffic forecasts. Therefore year 2040 forecasts were deemed most appropriate for this study.

Comment 16: *Pg 140: Summary tables should include LOS and 95% queues for all movements*

Response: The LOS results for each movement are shown in the Traffic Impact Study in Figures 6 and 7. The 95th percentile queue information is included in the level of service worksheets which are available from the City upon request.

Letter 2: Minnesota Pollution Control Agency

Comment 1: *General Comment: Due to the extensive amount of roof area on the proposed Project, this development offers the ideal landscape for hosting a solar power system. As this type of development is energy-intensive, a solar power system would help to minimize the environmental effects of the Project and reduce its impact on the energy system.*

Response: Comment noted.

Comment 2: *Cover Types (Item 7): This section indicates that 10.39 acres of wetland will be impacted. However, Table 10 indicates there are 3.15 acres of wetlands within the Project area and Table 12 indicates that 0.8 acres of wetland will be potentially impacted. Please clarify the correct acreage of wetlands in the Project area, the acres of wetlands impacted by the Project, as well as wetland mitigation, location, and replacement ratio information.*

This section of the EAW indicates the Project proposes 6 acres of tree removal. As you may be aware, trees store carbon and transform it into biomass, making them an excellent source of climate change mitigation. Leaving the forested area intact and planning the development around the forested area or replacing the trees with a similar acreage of trees would help to reduce the Project's greenhouse gas footprint, as well as make the Project site aesthetically

more pleasing. In addition, trees can reduce urban heat island effects, energy usage of nearby buildings, noise impacts and flooding. Trees can also improve air quality. The MPCA encourages the city of Corcoran and the Project proposer to rethink how to complete this development in a manner that is more environmentally beneficial.

Response: The Project Area consists of open agricultural land. Minimal trees are present and are concentrated near the edges of the Project Area. It is anticipated that tree removal may be avoided or limited to select areas along the Project Area boundary, which will be confirmed as the final design develops. The cover type data included in Table 4 on page 5 was derived from the Minnesota Department of Natural Resources (MnDNR) Land Cover Classification System data from 2007 which indicates wooded/forest areas are present in the western portion of the Project Area. Based on current site conditions, trees are not present within the western portion of the Project Area. Limited trees are present along the northern and eastern boundaries of the Project Area. It is anticipated that trees along the perimeter of the property will be preserved to the extent possible.

Comment 3: *Water Resources (Item 11): Chloride (salt) is a growing issue for lakes, streams, and groundwater around the state. For the proposed Project, the MPCA recommends smart salting practices for de-icing parking lots and driveways during the winter weather months. Additional resources are available at <https://www.pca.state.mn.us/water/statewide-chloride-resources>.*

If the Project site has the ability to discharge to a water with construction-related impairments, the Stormwater Pollution Prevention Plan (SWPPP) for the Project must specify additional erosion and sediment control Best management practices (BMPs) that are not mentioned in the EAW. These include immediately stabilizing soils that will not be worked for 7 or more days and providing a temporary sediment basin where 5 or more acres drain to a common location.

Redundant (double) down gradient sediment controls will be required where soil disturbance within 50 feet of the existing buffers to wetlands on the site cannot be avoided.

The National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit (CSW Permit) requires use of volume reduction practices (in lieu of wet sediment ponds) to reduce stormwater runoff from the new impervious surfaces reaching area waters, unless prohibited as described in the permit. The Project proposer is strongly encouraged to implement various green [infrastructure practices](#) to help meet the volume reduction requirements while at the same time providing other environment benefits. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.

Response: Comment noted. A SWPPP will be prepared that will identify erosion and sediment control BMPs in accordance with MPCA requirements.

Letter 3: Metropolitan Council

Comment 1: *Item 6 - Project Description: The floor square footage depicted in Table 2 (386,600 sq feet) differs from that shown in Figure 1, Concept Plan (566,600 sq feet). The two totals should be rectified for consistency.*

Response: The total gross building area for Proposed Lot 5 (Mini Storage/Self Storage) was incorrectly listed as 199,000 sq. ft. on Table 2. The correct gross building area for Proposed Lot 5 is 379,000 sq. ft. The total gross building area for the project is 566,600 sq. ft.

Comment 2: *Item 9 – Land Use: As indicated in the EAW, the proposed project will require a comprehensive plan amendment for the portion of the site with planned uses that are not part of the current light industrial designation.*

The EAW site is a small part of Transportation Analysis Zone (TAZ) #900 (this is a four-square-mile zone in the southwest part of Corcoran). The City's 2040 comprehensive plan expects TAZ #900 to gain +130 households, +230 population, and +44 jobs during 2020-2040. Should the subject development proceed, a higher level of employment would result. City staff can request a TAZ allocation adjustment, an additional +200 jobs, by contacting Council Research staff.

Response: Comment noted.

Comment 3: *Item 11 – Water Resources, Surface Water: We want to reiterate that the developer continues to work with the City, as Wetland Conservation Authority (WCA) and the Elm Creek Watershed District to limit impacts on wetlands. Additionally, stormwater must be pretreated before entering a wetland. The developer noted they will be working with the City as the WCA and will be applying for wetland banking credits. We encourage the developer to look within the same watershed/sub-watershed to do the wetland banking replacement. Finally, since the proposed development is within one mile of Peter Lake, which is impaired, and Jubert Lake, which is not impaired, we ask the developer to implement stormwater practices that would minimize negative impacts to these surface waters.*

Additionally, on page 5, the table states there are 12.94 acres of wetlands pre-construction but throughout the rest of the document, it is stated that there are 3.15 acres of wetland preconstruction. We ask the RGU to review and make clear the acreage of wetlands preconstruction.

Response: The 12.94 acres of wetland listed in Table 4 on page 5 was derived from the MnDNR Land Cover Classification System data from 2007. The 2007 Land Cover Classification data attributed 11 acres to fallow hydric soils and 2 acres to medium-tall and short grasses; these two land cover types were most closely associated with the wetland cover type. The data used for Table 4 was the most recent available for land cover classification; however, this data does not field located. The 3.15 acres of wetland referenced elsewhere in the EAW report is the most recent and accurate data on wetlands as field located and approved by the TEP, as noted in the January 6, 2020 Wetland Delineation Report.

Comment 4: *Item 11 – Water Resources, Wastewater: The EAW indicates wastewater service through use of Subsurface Sewage Treatment Systems and does not propose regional wastewater service at this time; and therefore, will not have an impact on the Metropolitan Disposal System. As indicated in the EAW, the method and timing of regional wastewater service to this area will be determined through a future study.*

Response: Comment noted.

Comment 5: *Item 11 – Water Resources, Water Supply: The following comments are offered for your consideration:*

- *Any future nearby municipal/public water supply wells will need to be considered carefully. Use of the same shallow/buried artesian sand aquifer could have negative consequence for nearby wetlands and surface waters, as well as any homes and commercial enterprises not connected to the municipal system.*
- *Wetlands appear to be part of a complex that pre-development would have connected to the wetland complexes and lake to the north.*
- *Stormwater management and landscape management practices at the site will be crucial to maintaining the quality and quantity of shallow groundwater. Salt, pesticide, and any landscape irrigation on site could influence shallow groundwater.*
- *The proposed site plan and future uses are likely carbon negative. Mitigation of the loss of open space, trees and shade, and permeable surfaces should be considered along with any wetland preservation and mitigation efforts.*
- *The development could be a good opportunity for solar roof panel installation.*
- *The future impervious surface estimates appear to be incorrect based on the proposed site plans. Building and pavement cover most of the site.*

Response: Comments noted. Buildings have been sited to avoid and minimize wetland impacts. Opportunities to further minimize wetland impacts will be considered during the final design and permitting process. The Project would result in minimal tree removal. The impervious surface area shown in Item 7 (Cover Types), Table 4, was estimated as 29.3 acres based on preliminary design plan and will confirmed as the final design develops.

Comment 6: *Item 19 – Cumulative Potential Effects: Council staff recommend the design and integration of solar panels at this proposed development to serve some portion of the electricity to be consumed by the industrial/warehouse floor space. Council staff recommend using the U.S. National Renewable Energy Lab’s tool “PV Watts” for cross-evaluating solar cost, design, and production (<https://pvwatts.nrel.gov/index.php>).*

Response: Comment noted.

Letter 3: Metropolitan Council

Comment 1: *Page 9, Geology. Well records near the development indicate that the surficial deposits in the project area consist of between 48 to 125 feet of clay.*

Response: Comment noted.

Comment 2: *Page, 12, Wetland Resources. This section describes the wetlands within the project area and Table 10: Wetlands within the Project Area indicates that there are 3.15 total acres of wetlands onsite, while Table 4: Cover Types on page 5 states that there are 12.94 acres of wetlands within the project area. Please update these sections with the correct total acres of wetlands and proposed wetland impacts.*

Response: As described above, the 12.94 acres of wetland listed in Table 4 on page 5 was derived from the MnDNR Land Cover Classification System data from 2007. The 2007 Land Cover Classification data attributed to 11 acres fallow hydric soils and 2

acres to medium-tall and short grasses; these two land cover types were most closely associated with the wetland cover type. The data used for Table 4 was the most recent available for land cover classification; however, this data does is not field located. The 3.15 acres of wetland referenced elsewhere is the most recent and accurate data on wetlands as field located and approved by the TEP, as noted in the January 6, 2020 Wetland Delineation Report.

Comment 3: *Page 13, Groundwater; Page 16, Water Appropriation. Given that there are wetlands on the site and that the surficial sediments are composed of clay, it is likely that there is perched water table in the project area. If there is a need to conduct dewatering in volumes that exceed 10,000 gallons per day, then a DNR Water Appropriation Permit will be required for the dewatering.*

Response: It is understood that a DNR Water Appropriation Permit will be required if it is necessary to conduct dewatering exceeding 10,000 gallons per day.

Comment 4: *Page 16, Stormwater. This section should identify what waterbody will receive stormwater flow from the project area after it leaves the site.*

Response: Stormwater runoff generated by the Project will be discharged to proposed stormwater ponds and roadway ditches.

Comment 5: *Page 16, Stormwater. Because there will be up to 21 acres of landscaping within the project area, the DNR recommends that the use of stormwater for the irrigation of landscaping be considered for this development. The use of stormwater from constructed stormwater features (not converted wetlands) does not require a DNR Water Appropriation Permit.*

Response: Comment noted.

Comment 6: *Page 16, Stormwater. The planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this [website](#). Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.*

We also encourage cities and counties to consider how they may participate in the [Statewide Chloride Management Plan](#) and provide public outreach to reduce the overuse of chloride. Here are some [educational resources](#) for residents as well as a [sample ordinance](#) regarding chloride use.

Response: Comment noted.

Comment 7: *Page 17, Water Supply. If one of the water supply wells will pump more than 10,000 gallons of water per day (or one million gallons of water in a year), then a DNR Water Appropriation Permit will be needed for the use of the well.*

Response: It is understood that a DNR Water Appropriation Permit would be required if water supply wells pump more than 10,000 gallons of water per day or one million gallons of water per year.

Comment 8: *Page 21, Rare Features. We encourage the development to use native seed mixes and plants in project stormwater features and landscaping in order to provide pollinator habitat. The Board of Soil and Water Resources' [website](#) contains many great resources for choosing seed mixes and establishing native plants.*

Response: Comment noted.

Comment 9: *Page 26, Dust Control. Should water for dust control be taken from a well, stream, or lake in volumes that exceed 10,000 gallons per day, or one million gallons per year, a DNR Water Appropriation Permit Application will be needed for the use of the water.*

Response: Comment noted.

Appendix A: Comments and Letters

Kendra Lindahl, AICP

Subject: RE: [External] RE: Pioneer Trail Industrial Park EAW

From: Jason D Gottfried <Jason.Gottfried@hennepin.us>

Sent: Monday, April 25, 2022 2:57 PM

To: Kendra Lindahl, AICP <KLindahl@landform.net>

Cc: Ashley Morello <Ashley.Morello@hennepin.us>; Karen Galles <Karen.Galles@hennepin.us>

Subject: RE: [External] RE: Pioneer Trail Industrial Park EAW

Hello Kendra,

Our interdisciplinary staff in public works has had an opportunity to review the Pioneer Trail Industrial Park EAW and we offer the following comments for consideration:

Pg 5, Table 4:

- ~~This is substantial wetland loss – can the proposer demonstrate what they have done to avoid wetland impacts?~~
- Significant land cover proposed as lawn, landscaping and pavement - Hennepin County encourages the proposer to reach out if they have interest on partnering to improve environmental outcomes from these cover types.

Pg 8 & 9:

- City ordinance and state law require that project proposers make an effort to avoided and minimize impacts to ALL wetlands before they can be permitted. What has the proposer has done to avoid and minimize wetland impacts?

Pg 11, Table 9:

- Hennepin County Environment & Energy Division has some financial resources to contribute to plan improvements (above regulatory requirements) that might benefit Jubert Lake or Peter Lake (both of which are included in the boundaries of subwatersheds that are currently priorities for water quality improvement.

Pg 15:

- What are receiving waterbodies to which those existing wetlands and road ditches drain? Need to know this in order to fully understand impact on nearby water bodies.

Pg 17, Section IV:

- ~~Recommend clarification of the current extent of wetlands on the site? Table 4 lists a much higher wetland acreage?~~

Pg 18, Table 12:

- What alternatives have been considered to avoid impacts to wetlands 3 and 4?
- If wetland impacts are necessary, city ordinance expresses a preference for mitigation to occur within city limits. Hennepin County in its role on the WCA TEP also request mitigation as close to the site of impact as possible. If necessary, project proposer should explore options first within the City of Corcoran, then within Hennepin County, then in areas of the bank service area outside of those geographies.

Pg 21:

- Given limited habitat in project area, Hennepin County encourages project proposer to preserve existing tree lines as part of their landscaping plan.

Pg 22:

- *We appreciate preservation of existing tree line*

Pg 23:

- *Given the large amount of planned landscaping for this project, Hennepin County encourages project proposer to consider habitat value (e.g. minimize turfgrass, include native plants and trees, etc.) when drafting landscape plans. These types of landscapes are also lower maintenance over the long-term.*

Pg 32:

- *Proposer should provide more information about alternatives considered to avoid 0.8 acres of wetland impacts.*

Pg 35:

- *Does proposed concept/right-of-way consider sufficient public right-of-way along Highway 55 should future roadway expansion be necessary at some point. This has been considered in various previous Highway 55 studies. Question for MnDOT*
- *This wetland in particular ("wetland 4" along Highway 55) has the potential to play a role in addressing downstream water quality impairments in Lake Independence, and is identified in a study prioritizing projects that is a collaborative effort between Hennepin County and the Pioneer-Sarah watershed management commission. If the project proposer would be willing to consider protection/restoration of this wetland these two entities would have technical and financial assistance to contribute to such a project. **It appears that by adjusting "Lot 2" and the southern stormwater pond slightly, impacts to "wetland 4" could be avoided.***

Pg 37:

- *I'd like to understand the drainage pathway between the project area and Lake Peter. If this project could help address that nutrient impairment through going above and beyond watershed requirements that would be valuable.*

Pg 42:

- *Appears there is some existing gully erosion in the area of wetland 3 - assume the development plans will include stabilization of that area, but to the extent that impact to that area can be avoided and additional assistance is desired to help stabilize erosion in that area, Hennepin County is happy to provide technical and potentially financial assistance to do that.*

Pg 96:

- *If project proposer has an interest in working with Hennepin County to restore some of the historic hydrologic connection between wetlands 1 and 3 on this site, this is something the county would be eager to discuss.*

Pg 132:

- *At some point in the future as this area redevelops, it may be prudent to have dedicated left, thru, and right-turn lanes along Pioneer Trail at the approach to CSAH 19.*

Pg 134, Traffic forecast intro:

- *20-yr growth forecast is recommended as a standard practice. This would be 2047 in this case (projected build complete 2027).*

Pg 140:

- *Summary tables should include LOS and 95% queues for all movements*

Please reach out to Karen Galles directly for any environmental related comments

Karen.galles@hennepin.us / 612-235-0712

Thank you for the opportunity to review and your consideration!

Jason

Jason Gottfried

Transportation Planner
Transportation Planning

Office: 612-596-0394 Cell: 612-719-8073

jason.gottfried@hennepin.us

Hennepin County Public Works

1600 Prairie Drive

Medina, MN 55340

(working remotely)

From: Jason D Gottfried <Jason.Gottfried@hennepin.us>

Sent: Tuesday, April 5, 2022 3:21 PM

To: Kendra Lindahl, AICP <KLindahl@landform.net>

Cc: Ashley Morello <Ashley.Morello@hennepin.us>

Subject: Pioneer Trail Industrial Park EAW

Hello Kendra,

Hope all is well with you. We received the latest EQB monitor notice for the Pioneer Trail Industrial Park and would appreciate a copy or link to the EAW for our review when you have a chance? I was not able to locate on the city's website

Thanks!

Jason

Jason Gottfried

Transportation Planner
Transportation Planning

Office: 612-596-0394 Cell: 612-719-8073

jason.gottfried@hennepin.us

Hennepin County Public Works

1600 Prairie Drive

Medina, MN 55340

(working remotely)

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April 28, 2022

Kendra Lindahl
City Planner
City of Corcoran
8200 County Road 116
Corcoran, MN 55340

Re: Pioneer Trail Industrial Park Environmental Assessment Worksheet

Dear Kendra Lindahl:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Pioneer Trail Industrial Park project (Project) located in Corcoran, Hennepin County, Minnesota. The Project consists of development of a new industrial park. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

General Comment

Due to the extensive amount of roof area on the proposed Project, this development offers the ideal landscape for hosting a solar power system. As this type of development is energy-intensive, a solar power system would help to minimize the environmental effects of the Project and reduce its impact on the energy system.

Cover Types (Item 7)

- This section indicates that 10.39 acres of wetland will be impacted. However, Table 10 indicates there are 3.15 acres of wetlands within the Project area and Table 12 indicates that 0.8 acres of wetland will be potentially impacted. Please clarify the correct acreage of wetlands in the Project area, the acres of wetlands impacted by the Project, as well as wetland mitigation, location, and replacement ratio information.
- This section of the EAW indicates the Project proposes 6 acres of tree removal. As you may be aware, trees store carbon and transform it into biomass, making them an excellent source of climate change mitigation. Leaving the forested area intact and planning the development around the forested area or replacing the trees with a similar acreage of trees would help to reduce the Project's greenhouse gas footprint, as well as make the Project site aesthetically more pleasing. In addition, trees can reduce urban heat island effects, energy usage of nearby buildings, noise impacts and flooding. Trees can also improve air quality. The MPCA encourages the city of Corcoran and the Project proposer to rethink how to complete this development in a manner that is more environmentally beneficial.

Water Resources (Item 11)

- Chloride (salt) is a growing issue for lakes, streams, and groundwater around the state. For the proposed Project, the MPCA recommends smart salting practices for de-icing parking lots and driveways during the winter weather months. Additional resources are available at <https://www.pca.state.mn.us/water/statewide-chloride-resources>.
- If the Project site has the ability to discharge to a water with construction-related impairments, the Stormwater Pollution Prevention Plan (SWPPP) for the Project must specify additional erosion and sediment control Best management practices (BMPs) that are not mentioned in the EAW. These include immediately stabilizing soils that will not be worked for 7 or more days and providing a temporary sediment basin where 5 or more acres drain to a common location.
- Redundant (double) down gradient sediment controls will be required where soil disturbance within 50 feet of the existing buffers to wetlands on the site cannot be avoided.
- The National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit (CSW Permit) requires use of volume reduction practices (in lieu of wet sediment ponds) to reduce stormwater runoff from the new impervious surfaces reaching area waters, unless prohibited as described in the permit. The Project proposer is strongly encouraged to implement various green [infrastructure practices](#) to help meet the volume reduction requirements while at the same time providing other environment benefits. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW, please contact me by email at Karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,

Karen Kromar

This document has been electronically signed.

Karen Kromar
Planner Principal
Environmental Review Unit
Resource Management and Assistance Division

KK:rs

cc: Dan Card, MPCA, St. Paul
Roberta Getman, MPCA, Rochester
Bill Wilde, MPCA, St. Paul.



May 5, 2022

Kendra Lindahl, City Planner
City of Corcoran
8200 County Road 116
Corcoran, MN 55340

**RE: City of Corcoran - Environmental Assessment Worksheet (EAW) –
Pioneer Trail Industrial Park**
Metropolitan Council Review No. 22742-1
Metropolitan Council District No. 1

Dear Kendra Lindahl:

The Metropolitan Council received the EAW for the Pioneer Trail Industrial Park project in Corcoran on March 29, 2022. The proposed project is in southwest Corcoran, at the northwest corner of Highway 55 and Pioneer Trail. The proposed development consists of approximately 56 acres with 10 buildings and a new public road. The plans include gas/convenience, offices, retail, warehousing, light manufacturing, and mini storage/self-storage.

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 6 – Project Description (Eric Wojchik, 651-602-1330)

The floor square footage depicted in Table 2 (386,600 sq feet) differs from that shown in Figure 1, Concept Plan (566,600 sq feet). The two totals should be rectified for consistency.

Item 9 – Land Use (Freya Thamman, 651-602-1750, Todd Graham, 651-602-1322)

As indicated in the EAW, the proposed project will require a comprehensive plan amendment for the portion of the site with planned uses that are not part of the current light industrial designation.

The EAW site is a small part of Transportation Analysis Zone (TAZ) #900 (this is a four-square-mile zone in the southwest part of Corcoran). The City's 2040 comprehensive plan expects TAZ #900 to gain +130 households, +230 population, and +44 jobs during 2020-2040. Should the subject development proceed, a higher level of employment would result. City staff can request a TAZ allocation adjustment, an additional +200 jobs, by contacting Council Research staff.

Item 11 – Water Resources, Surface Water (Maureen Hoffman, 651-602-1279)

We want to reiterate that the developer continues to work with the City, as Wetland Conservation Authority (WCA) and the Elm Creek Watershed District to limit impacts on wetlands. Additionally, stormwater must be pretreated before entering a wetland. The developer noted they will be working with the City as the WCA and will be applying for wetland banking credits. We encourage the developer to look within the same watershed/sub-watershed to do the wetland banking replacement. Finally, since the proposed development is within one mile of Peter Lake, which is

impaired, and Jubert Lake, which is not impaired, we ask the developer to implement stormwater practices that would minimize negative impacts to these surface waters.

Additionally, on page 5, the table states there are 12.94 acres of wetlands pre-construction but throughout the rest of the document, it is stated that there are 3.15 acres of wetland preconstruction. We ask the RGU to review and make clear the acreage of wetlands preconstruction.

Item 11 – Water Resources, Wastewater (Roger Janzig, 651-602-1119)

The EAW indicates wastewater service through use of *Subsurface* Sewage Treatment Systems and does not propose regional wastewater service at this time; and therefore, will not have an impact on the Metropolitan Disposal System. As indicated in the EAW, the method and timing of regional wastewater service to this area will be determined through a future study.

Item 11 – Water Resources, Water Supply (John Clark, 651-602-1452)

The following comments are offered for your consideration:

- Any future nearby municipal/public water supply wells will need to be considered carefully. Use of the same shallow/buried artesian sand aquifer could have negative consequence for nearby wetlands and surface waters, as well as any homes and commercial enterprises not connected to the municipal system.
- Wetlands appear to be part of a complex that pre-development would have connected to the wetland complexes and lake to the north.
- Stormwater management and landscape management practices at the site will be crucial to maintaining the quality and quantity of shallow groundwater. Salt, pesticide, and any landscape irrigation on site could influence shallow groundwater.
- The proposed site plan and future uses are likely carbon negative. Mitigation of the loss of open space, trees and shade, and permeable surfaces should be considered along with any wetland preservation and mitigation efforts.
- The development could be a good opportunity for solar roof panel installation.
- The future impervious surface estimates appear to be incorrect based on the proposed site plans. Building and pavement cover most of the site.

Item 19 – Cumulative Potential Effects (Eric Wojchik, 651-602-1330)

Council staff recommend the design and integration of solar panels at this proposed development to serve some portion of the electricity to be consumed by the industrial/warehouse floor space. Council staff recommend using the U.S. National Renewable Energy Lab's tool "PV Watts" for cross-evaluating solar cost, design, and production (<https://pvwatts.nrel.gov/index.php>).

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 Freya Thamman, Principal Reviewer, at 651-602-1750 or via email at Freya.Thamman@metc.state.mn.us.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Judy Johnson, Metropolitan Council District 1
Freya Thamman, Sector Representative/Principal Reviewer
Reviews Coordinator

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

May 5, 2022

Kendra Lindahl, City Planner
City of Corcoran
8200 County Road 116
Corcoran, MN 55340

Dear Kendra Lindahl,

Thank you for the opportunity to review the Pioneer Trail Industrial Park EAW located in Hennepin County. The DNR respectfully submits the following comments for your consideration:

1. Page 9, Geology. Well records near the development indicate that the surficial deposits in the project area consist of between 48 to 125 feet of clay.
2. Page, 12, Wetland Resources. This section describes the wetlands within the project area and *Table 10: Wetlands within the Project Area* indicates that there are 3.15 total acres of wetlands onsite, while *Table 4: Cover Types* on page 5 states that there are 12.94 acres of wetlands within the project area. Please update these sections with the correct total acres of wetlands and proposed wetland impacts.
3. Page 13, Groundwater; Page 16, Water Appropriation. Given that there are wetlands on the site and that the surficial sediments are composed of clay, it is likely that there is perched water table in the project area. If there is a need to conduct dewatering in volumes that exceed 10,000 gallons per day, then a DNR Water Appropriation Permit will be required for the dewatering.
4. Page 16, Stormwater. This section should identify what waterbody will receive stormwater flow from the project area after it leaves the site.
5. Page 16, Stormwater. Because there will be up to 21 acres of landscaping within the project area, the DNR recommends that the use of stormwater for the irrigation of landscaping be considered for this development. The use of stormwater from constructed stormwater features (not converted wetlands) does not require a DNR Water Appropriation Permit.
6. Page 16, Stormwater. The planned increase in impervious surfaces will also increase the amount of road salt used in the project area. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and

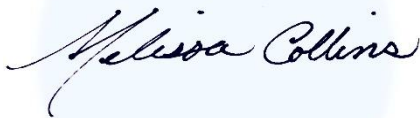
property managers. More information and resources can be found at this [website](#). Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

We also encourage cities and counties to consider how they may participate in the [Statewide Chloride Management Plan](#) and provide public outreach to reduce the overuse of chloride. Here are some [educational resources](#) for residents as well as a [sample ordinance](#) regarding chloride use.

7. Page 17, Water Supply. If one of the water supply wells will pump more than 10,000 gallons of water per day (or one million gallons of water in a year), then a DNR Water Appropriation Permit will be needed for the use of the well.
8. Page 21, Rare Features. We encourage the development to use native seed mixes and plants in project stormwater features and landscaping in order to provide pollinator habitat. The Board of Soil and Water Resources' [website](#) contains many great resources for choosing seed mixes and establishing native plants.
9. Page 26, Dust Control. Should water for dust control be taken from a well, stream, or lake in volumes that exceed 10,000 gallons per day, or one million gallons per year, a DNR Water Appropriation Permit Application will be needed for the use of the water.

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: Jon Rausch, Landspec Fund II, LLC

Appendix B: Resolution Declaring Finding of "No Need"

Appendix C: Environmental Assessment Worksheet