SCHERER SITE AND HALL’S ISLAND RECONSTRUCTION

FINDINGS OF FACT AND RECORD OF DECISION

Background

The Minneapolis Park & Recreation Board (MPRB) is the Responsible Governmental Unit (RGU) for environmental review of the Scherer Site and Hall’s Island Reconstruction Project. The preparation of the Environmental Assessment Worksheet (EAW) was in accordance with the Environmental Review Regulations of the Minnesota Environmental Quality Board (EQB) for a mandatory EAW.

The EAW was reviewed by the MPRB Board of Commissioners and found to be complete for distribution at their February 15, 2017 meeting. The EAW was filed with the EQB and circulated for review and comment to the EQB’s EAW Distribution List. The notice was published in the EQB Monitor on February 20, 2017, announcing a 30-day comment period which ended on March 22, 2017. A news release was issued informing the public that the EAW was available at the MPRB’s web page, at MPRB Headquarters, and at the Minneapolis Central Library. The news release directed people wishing to make comments to file them with the MPRB.

Brief Project Description

The MPRB is proposing to restore Hall’s Island in the Mississippi River and establish an adjacent eight-acre riverfront park at the Scherer Site. This property, formerly owned by Scherer Brothers Lumber Company, is located on the east bank of the Mississippi River, upstream of Plymouth Avenue in northeast Minneapolis. Recreation of Hall’s Island would create new habitat within the Mississippi River channel in a portion of the north/northeast Minneapolis urban environment that is dominated by industrial uses and has limited access to natural areas. Hall’s Island is currently planned to feature several types of natural habitats, including a shrub-dominated riparian bench, sandy beach, and an upland zone providing a mix of floodplain forest and mesic to wet herbaceous layers. The side channel east of the island (between the island and the mainland) would be designed to incorporate features that improve mussel habitat along this stretch of river. Additional planned habitat features for fauna include nesting/basking logs, rock and brush nesting areas, sandy beach area, rock ledges and standing snags for habitat.

In addition to the island, the park design for the Scherer Site would include a gravel beach designed to withstand seasonal flooding and multiple zones of native vegetation. The recently-constructed Mississippi East Bank Trail connection through the site will be preserved, serving as an important bicycle commuter connection with Boom Island to the south and a trail extension to the north. Additional public amenities that may be included at the Scherer Site include boat rental and storage for paddlers, a farmer’s market area, a park-supportive café pavilion, and terraced gathering spaces to be programmed throughout the seasons.

Construction of Hall’s Island and a park at the Scherer Site are consistent with RiverFirst initiatives to transform currently low habitat-value segments of the river corridor through island and shoreline...
restoration. Additional benefits derived from these efforts include creating economic and recreation opportunities in underserved communities.

The proposed project is planned to be constructed in phases, with Phase 1 beginning in late 2017. Phase 1 will consist of soil clean-up, debris removal, and grading at the Scherer Site, and construction of Hall’s Island. It is anticipated that construction would begin by grading the Scherer Site and then working outward from the mainland to construct the island. The mainland portion of the project would be contoured according to the proposed grading plan using on-site materials. Excess materials from grading would either remain stabilized on-site for future incorporation or disposed of at an approved off-site location. Phase 1 construction is anticipated to last up to eight months, with the majority of the in-water work proposed to occur during low-flow conditions.

Additional, future phases of island development would include boardwalk construction, as well as pedestrian bridge abutments, piers, and pedestrian bridges to connect the mainland with the island. The boardwalk would consist of an elevated walkway allowing pedestrians to traverse the length of the island while limiting pedestrian access to other parts of the island as a means of protecting habitat. In addition, the boardwalk would allow for movement of water and wildlife below the elevated walkway. Observation platforms along the boardwalk would allow opportunities for users to enjoy river and skyline views outside of the main walkway. Future phases of the mainland park development include increased landscaping, additional shared use trail connections, equipment rental facilities, and structures needed to support activities such as a farmers market, a café, and/or interpretive programming. Construction timing for future phases of island and park development is dependent on project funding.

Comments Received, Responses, and Other Documents Reviewed

The 30-day EAW review and comment period began February 20, 2017 and terminated March 22, 2017. A total of ten written comments were received during the public comment period, three from the public, six from government agencies, and one from a special interest group:

- Sean O’Brien
- Jacqueline Rodkewich
- John Binks
- City of Binks
- Minnesota Department of Natural Resources
- Minnesota Pollution Control Agency
- U.S. Department of the Interior – National Park Service
- Metropolitan Council
- Minnesota Historical Society – Minnesota Historic Preservation Office
- Friends of the Mississippi River

Written comments were received from the Minnesota Department of Transportation after the close of the public comment period on March 28, 2017; those comments are also addressed here.

The following section provides a summary of these comments and responses to them. Comment letters are available for review in Exhibit A.
Public Comments – Sean O’Brien, received 2/21/2017

Comment 1: I am writing to say that I am very excited to see that the MPRB has decided to move ahead with this project. I look forward to the day when parkland lines the banks of the Mississippi River from north to south throughout all of Minneapolis.

Response 1: Comment noted.

Comment 2: Prioritize the environment, with a high value put on returning as much land as possible to its historic, natural state and protecting native endangered wildlife such as monarch butterflies and other pollinators.

Response 2: Comment noted.

Comment 3: Encourage equity by making this land accessible and usable by people of all means and backgrounds.

Response 3: Local beneficiaries of the proposed project include users of park facilities, particularly those in underserved areas of north and northeast Minneapolis. The proposed park would also extend beyond a particular segment of the City by becoming part of the MPRB’s regional park system, a network of larger sized parks that essentially function as the metro-area’s version of the state park system. The proposed project would be available to all users and would be designed to comply with Americans with Disabilities Act access guidelines.

Comment 4: Provide for a variety of physical activities for people of all ages and abilities, especially in ways that connect people to nature.

Response 4: Comment noted. As identified in the EAW, the proposed project is being driven by three key components: ecological benefits (protecting and supporting a diverse range of native species); community connections (reconnecting people to the River through a dynamic, year-round park experience); and recreation (providing a softer shoreline edge and more accessible connection to the River, and linking multiple regional routes).

Public Comment – Jacqueline Rodekewich, received 2/21/2017

Comment 1: Return Halls Island to a natural state. Native plants only. Let the river be a river.

Response 1: Comment noted. The planting plan incorporates use of plants suited for, and native to, this riparian setting.

Public Comments – John Binks, received 2/25/2017

Comment 1: I support, wholeheartedly and without reservation, the Hall’s Island restoration project as outlined in the EAW.

Response 1: Comment noted.

Comment 2: The goals for the project appear clear, feasible, interconnected, and laudable.

Response 2: Comment noted.
Comment 3: The pedestrian footbridge is a fine idea, especially, too, in combination with the riparian bench which “would be constructed such that it would not be attractive or easy for users to access the island from the water to protect habitat.”

Response 3: Comment noted.

Comment 4: Try to be careful that the uses are not inconsistent with maintaining a sense of the serenity and naturalness of the area, i.e., don’t “overload” the site with activity.

Response 4: The proposed project has been developed with a focus on creating a natural setting with opportunities for recreational use or access to recreational use in defined spaces (i.e. trails, boardwalk, beach, etc.)

Comment 5: Consider how uses out of season might be encouraged.

Response 5: Upon completion, the proposed project would be available for use year-round. Off-peak seasonal uses are expected to be similar to uses at other MPRB parks and areas along the river and may include activities such as hiking, snow-shoeing, etc. Trails would be maintained according to the MPRB’s winter maintenance plan.

Comment 6: I realize that the neighboring area is out of scope, but it would help to clarify what this sentence in the EAW actually implies: “Commercial development in this location would aid in activating and financially supporting the operations of the park. Parcel D development would occur under a separate process and is not included with the currently proposed Scherer Site and Hall’s Island project.” My concern, as you might anticipate, is that in seeking a source of financial support for the Hall’s Island project, compromises might be made that ultimately imperil and degrade the goals set out in the EAW.

Response 6: As described in the EAW, Parcel D is a planned future project that would include some level of leased development space for office/commercial use, flexible seasonal use as well as park supportive space on the remaining 3.5 acres of land located in the northeast portion of the Scherer Site. The MPRB would retain ownership of the parcel of land. A primary goal for Parcel D development is to activate and help support operations of the park on the Scherer Site, as discussed in the River First Initiative and the Draft Above the Falls Master Plan. There is no timeline for the development of Parcel D. Parcel D development would occur under a separate process and is not included with the currently proposed Scherer Site and Hall’s Island project.

Agency Comments – City of Minneapolis, received 3/17/2017

Comment 1: Section 8, page 11, “City of Minneapolis - PDR” – Floodplain permitting is primarily completed through the City’s land use application and review, not through PDR.

Response 1: Comment noted.

Comment 2: Section 11, page 18, “…regional groundwater flow is from west-southwest toward the Mississippi River.” – Verify direction of groundwater flow is from the west-southwest.

Response 2: This text should state that regional groundwater flow is to the west-southwest toward the Mississippi River.
Comment 3: Section 11.b.ii, page 19, “Stormwater Management” – The project appears to trigger the City’s stormwater management requirements. There appears to be 0.5 acres of post-construction impervious surfaces proposed (Table 2). Please address compliance with the City’s stormwater management requirements.

Response 3: Coordination with the City Public Works Storm and Surface Water Management staff will be part of project permitting to ensure that the project is developed in a manner that complies with City stormwater management requirements.

Comment 4: Section 11.b.iii, page 20, “Water Appropriation” – The EAW does not specifically state dewatering during construction will not be necessary. Please verify if this is the case. If dewatering of groundwater would be needed, discuss potential for contamination and appropriate dewatering measures.

Response 4: Dewatering is not anticipated to be needed as part of project construction. As such, the proposed project would not appropriate surface or groundwater.

Comment 5: Page 45, “Cumulative potential effects” – Clarify that the stormwater associated with Parcel D could tie into the Minneapolis storm sewer system rather than sanitary sewer system.

Response 5: Stormwater management for Parcel D will be addressed in a suitable manner concurrent with development of that parcel. Proposed stormwater management measures will align with development of the parcel along with City of Minneapolis stormwater rules.

Comment 6: Figure 8 – There is also a City storm sewer located on the south side of 8th Ave NE, potentially in the Project Area. This should be identified and addressed if impacted.

Response 6: The City storm sewer will be noted on the plans. The referenced sewer will not be impacted as part of the first phase of the project. If there is potential for impact to this storm sewer line in future development phases, then any impacts will be addressed during the time of design.

Comment 7: Plans, “Existing City storm sewer outfall” – The existing storm sewer outfall on the south side of 8th Ave NE appears to outlet directly at the proposed Lighthouse Bridge east abutment. The outfall should be located in relation to any proposed improvements to allow access and not create conflicts between the flows and infrastructure.

Response 7: The referenced sewer will not be impacted as part of the first phase of the project. If it is impacted in the future, under final design of the bridge abutments, modifications or improvements to that existing infrastructure will be addressed at that time.

Agency Comments – Minnesota Department of Natural Resources (MNDNR), received 3/20/2017

Comment 1: The [EAW] document provides a thorough analysis of potential impacts and proposed mitigation methods, but additional information, including an alternatives analysis may be required as part of the Work in Public Waters permit application process.

Response 1: Comment noted. It is expected that an alternatives analysis will be included as part of permitting, per permit application requirements.
Comment 2: Regarding mussel species, we would like to note that we have released other mussel species that are not listed in the EAW below Lock and Dam 1, and fish could have conceivably brought juveniles upstream prior to the Upper St. Anthony lock closures. Those include the federally endangered winged mapleleaf (Quadrula fragosa), MN Threatened spike (Elliptio diatata), mucket (Actinonaias ligamentina), and washboard (Megalonaias nervosa). We have not seen evidence during any of our recent surveys, but it is possible that they are present.

Response 2: Comment noted.

Agency Comment – Minnesota Pollution Control Agency (MPCA), received 3/22/2017

Comment 1: Minnesota Pollution Control Agency (MPCA) staff has reviewed the EAW and have no comments at this time.

Response 1: Comment noted.

Agency Comments – U.S. Department of Interior – National Park Service (NPS), received 3/22/2017

Comment 1: The entire project is located with the MNRRRA and the resulting habitat and recreation improvements are largely consistent with the policies set forth by our Comprehensive Management Plan (CMP).

Response 1: Comment noted.

Comment 2: Section 6(b.), p. 7 – Three future pedestrian bridges are mentioned. The north bridge is planned to be the longest constructed with four span segments and the placement of three piers in the new side channel. Is there potential for the three piers and/or narrow exit of the side channel to present safety risks to paddlers, boats, or park users during high flow events?

Response 2: The pedestrian bridges associated with the proposed project are not anticipated to pose high-flow hazards greater than other bridge and pier structures that currently exist on the Mississippi River. Access to Hall’s Island during periods of high flow will be evaluated on a case-by-case basis. Bridges to the island may be closed if use is deemed to pose a safety hazard at the time.

Comment 3: Section 6(d.), p. 8 – In this section it is stated that, “The proposed project is driven by three key components:

- Ecological Benefits, protecting and supporting a diverse range of native terrestrial species and,"

It should be noted that the project would benefit aquatic species as well.

- Ecological Benefits, protecting and supporting a diverse range of native terrestrial and aquatic species and”

Response 3: “Aquatic species” was intended to be part of this sentence and inadvertently omitted.

Comment 4: Table 2, p. 10 – The table provides a comparison summary of cover types before and after the project. In the table, the cover types of “lawn” and “landscaping” are
combined into one. They should be distinguished from each other and the amount of lawn in the final project should be minimized given the habitat focus of the project. By listing these separately, the amount of new habitat created would be better understood.

Response 4: Table 2 was populated based on cover types identified in the EQB’s EAW Form, following cover type definitions in the EQB’s EAW Guidelines. This increase in lawn/landscaping cover type is due to the planned conversion of the current vacant lot/sparse vegetation cover type to vegetated park land on the Scherer Site.

Comment 5: Section 9(a)(ii.), p. 12-14 – The Comprehensive Management Plan (CMP) for the Mississippi River and Recreation Area (MNRRA) should be recognized and described in this section.

Response 5: Comment noted.

Comment 6: Section 19(c), p. 45 – Stormwater impacts are not anticipated with this project, but it is noted that development of Parcel D could require stormwater management. The EAW states that “stormwater associated with Parcel D would either be tied into the Minneapolis municipal sewer system or addressed in another suitable manner as determined by the MPRB, any development partners for the project, and City of Minneapolis. Since the overall project is habitat focused, a commitment should be made to use BMPs to minimize stormwater impacts. This could be done by committing to implement the performance goals within the Minimal Impact Design Standards (MIDS) developed by the Minnesota Pollution Control Agency (MPCA)

Response 6: Stormwater management for Parcel D will be addressed in a suitable manner concurrent with development of that parcel. Proposed stormwater management measures will align with development of that parcel along with City of Minneapolis stormwater rules.

Comment 7: Figure 4 – The depiction of the recreated island implies completion in 2014. It should be changed to 2018.

Response 7: Comment noted. The current plan for the recreated island generally matches that which was planned in 2014. The label depicting the image on the far right of Figure for as “Proposed Project” became omitted in final document compilation.

Agency Comments – Metropolitan Council, received 3/21/2017

Comment 1: Item 6b, Project Description – The EAW should provide the context that a portion of the Scherer Site is within Above the Falls Regional Park. Because that portion of the site is designated as regional parkland, acquisition of the land was eligible for Minnesota Legacy Parks and Trails Fund and the Metropolitan Council’s Regional Park Acquisition Opportunity Fund grants. The EAW should clarify that the site was also acquired with Metropolitan Council bonds. This section references the 2013 Draft Above the Falls Regional Park Master Plan. Please note that this master plan has not been approved by the Metropolitan Council, which is required prior to implementation of the plan. However, the Metropolitan Council approved a separate amendment to the Above the Falls Regional Park Master Plan in September 2014, which addresses the restoration of Scherer Site and Hall’s Island Reconstruction
Findings of Fact and Record of Decision
Hall’s Island and the development of Scherer Park. This amendment should be explained in the EAW.

Response 1: Comment noted. The Metropolitan Council has approved several separate amendments to the Above the Falls Regional Park Master Plan; in September 2014 a master plan amendment for the Scherer Park was approved by the Metropolitan Council.

Comment 2: Item 6b, Project Description – The plan is to ultimately make the proposed island accessible by boardwalk trail and bridges from the east bank, and by canoe along over half its eastern bank. This creates challenges for the indicated main project goals of maintaining the island as a natural habitat environment and migratory bird flyway stopover location.

The emergent island will only be an average of 100-125 feet in width when the Mississippi River (River) is at ordinary high water level, and would be completely submerged during a 100-year return frequency flood event. The proposed construction elevation of the boardwalk at approximately two feet above grade across the length of the island will place a small portion of the boardwalk above the 100-year return frequency flood elevation of 808 feet, while most of the boardwalk will be below the water level. The proposed north access bridge from the eastern river bank, as well as either end of the boardwalk, will protrude above the water level at the flood stage, making it especially vulnerable to damage from floating debris moving downstream during high water periods.

Response 2: The information as stated in the comment is correct. Island infrastructure has been designed to prevent damage in large, rare flow events (i.e., no boardwalk railings, boardwalk aligned parallel to flow direction, island vegetation will reduce flow velocities, etc.) and is noted.

Comment 3: Item 6b, Project Description – While the stated intent of the future boardwalk component of the island reconstruction project is to “limit pedestrian access (from the boardwalk to other parts of the island) as a means of protecting habitat,” it is extremely doubtful that efforts to limit island ‘exploring’ will be very successful. If supplied with a boardwalk down its entire length and a gravel beach along half its east-facing length, the island will present itself as an attractive opportunity for sightseeing.

If the ultimate intent is for all island visitors to remain on the boardwalk at all times, planned signage must make that position very clear. Night access should be prevented, or a development of footpaths and accumulation of trash will take place throughout the island, quickly deteriorating its fragile ecosystem and deterring its ability to function as a ‘drawing card’ for either migrating songbirds or refuge for ‘a diverse range of native terrestrial species.’

Response 3: The boardwalk would be designed and installed as part of a future phase. Boardwalk signage will be considered during that phase. It is intended that the boardwalk be raised up off the ground and include a bumper curb, making access off the boardwalk onto the island difficult and visually discouraged. The beach proposed on the eastern portion of the island is anticipated to draw those species that prefer open, sandy areas to breed and nest and would be comprised of different materials than the mainland gravel beach.
The riparian bench would separate the island beach area from the water’s edge. The shrub community will make access from the water onto this area difficult and, hopefully, undesirable.

MPRB hours for parks are 6 am-midnight in developed areas and 6 am-10 pm in undeveloped areas; the proposed project would follow standard MPRB operating hours.

Comment 4: Item 6d, Project Description – This section should indicate that Hall’s Island and a portion of the Scherer site are part of Above the Falls Regional Park, which is component of the metropolitan regional parks system, rather than the “Minneapolis regional park system.”

Response 4: Comment noted

Comment 5: Item 9ai, Land Use – The EAW describes a number of parks that are in the vicinity of the Scherer site. For context, this section should recognize that these parks are components of Above the Falls Regional Park and Central Mississippi Riverfront Regional Park to relate to discussions of these regional parks in other portions of the EAW. Additionally, a map showing the Scherer site, Above the Falls and Central Mississippi Riverfront Regional Parks, and the Mississippi East Bank Trail should be added to the EAW.

Response 5: Comment noted. See Figure 1 (attached as Exhibit B).

Comment 6: Item 9a(ii), Land Use – This section references the 2013 Draft Above the Falls Regional Park Master Plan. Since that plan has not been approved by the Metropolitan Council, the section should be revised to discuss the proposed project’s consistency with the 2014 Above the Falls Regional Park Master Plan Amendment (Business Item No. 2014-231), which has received Metropolitan Council approval for the restoration of Hall’s Island and the development of Scherer Park.

The EAW references the Metropolitan Council’s 2030 Regional Parks Policy Plan and the 2030 Regional Development Framework. These documents are no longer in effect and have been replaced by the 2040 Regional Parks Policy Plan and Thrive MSP 2040, respectively. An analysis of how the project is consistent with these policy documents should be included in the EAW and the reference to these documents should be revised.

Response 6: Comment noted. The Metropolitan Council adopted the 2040 Regional Parks Policy Plan in February 2015 and Thrive MSP 2040 in May 2014. These are the current policy documents for the regional park system. Based upon a further review of the current plans the project is consistent with these policy documents. The project directly addresses the 2040 Regional Parks Policy Plan advances the Thrive MSP 2040 outcomes of Stewardship, Prosperity, Equity, Livability, and Sustainability through expansion of “the Regional Parks System to conserve, maintain, and connect natural resources identified as being of high quality or having regional importance”; providing a “comprehensive regional park and trail system that preserves high-quality natural resources, increases climate resiliency, fosters healthy outcomes, connects communities, and enhances quality of life in the region”; and “strengthen(ing) equitable usage of regional parks and trails by all our region’s residents, such as across age, race, ethnicity, income, national origin, and ability.”
Comment 7: Item 9aII, Land Use – This section references the Minneapolis Plan for Sustainable Growth (2009), the comprehensive plan for the City of Minneapolis. It mentions the Open Spaces and Parks Chapter, which discusses strategies for expanding access to the Mississippi River in a manner that implements the Above the Falls Master Plan. The EAW should be revised to address the guiding land use for the Scherer Brothers site, which is currently guided as Transitional Industrial. When the City updates its comprehensive plan, the guiding land use should be consistent with the updated regional park boundary and use, as well as the planned non-park uses on Parcel D. If development precedes the update, it may require a comprehensive plan amendment. In either case, the Metropolitan Council will evaluate the amendment for consistency with Council policies and for conformity with the 2040 Regional Parks Policy Plan.

Response 7: *The Scherer Brothers site is Transitional Industrial; parks are a permitted land use for the site. The City of Minneapolis comprehensive plan (Minneapolis 2040), is currently being updated and will reflect the land use changes.*

Comment 8: Item 19, Cumulative Potential Effects – References to the 2013 Draft Above the Falls Regional Park Master Plan and the 2030 Regional Parks Policy Plan throughout this section should be revised to reflect the 2014 Above the Falls Regional Park Master Plan Amendment and the 2040 Regional Parks Policy Plan as described above.

Response 8: *Comment noted. The 2013 Draft Above the Falls Regional Park Master Plan and subsequent amendments to the plan approved in 2014 and 2015 and the 2040 Regional Parks Policy Plan are the most current plans.*

**Minnesota Historical Society – Minnesota Historic Preservation Office (SHPO), received 3/22/2017**

Comment 1: As you are aware, a part of the proposed project, specifically the area south of the Plymouth Avenue Bridge, is located within the boundary of the St. Anthony Falls Historic District, a historic property which is listed in the National Register of Historic Places. We have reviewed the proposed project documentation as included in the EAW, the Project overview and 60% Design Plans (dated 12/12/2016) and it is our opinion that the project, as currently proposed, will not adversely affect the St. Anthony Falls Historic District.

Response 1: *Comment noted*

Comment 2: In regards to the archeological resources, we have reviewed the information included in the EAW and we have determined that the potential for intact archeological resources within the project area is low and therefore we believe that no further archeological investigation is needed.

Response 2: *Comment noted.*

Comment 3: If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency.
Response 3: Comment noted. Table 3 of the EAW, Permits and Approvals Required, identifies the need for SHPO coordination for Section 106 compliance as a part of the USACE’s permitting process. Required permits and approvals are also listed below.

Special Interest Group Comments – Friends of the Mississippi River (FMR), received 3/22/2017

Comment 1: In general, we are very satisfied with the information provided in the EAW document. We commend MPRB for doing their due diligence to examine potential impacts to the Mississippi River environment and we do not think an EIS is warranted.

Response 1: Comment noted

Comment 2: The Planting Plan in Appendix A, L-04 shows sycamore (Platanus occidentalis L) plantings, which are not native to Minnesota. Given the fact that sycamore trees are native in Iowa and Wisconsin and their inclusion may be in pursuit of an assisted migration strategy for this species (in response to climate change), we can support this species being planted. We would like to recommend, however, that 50 percent of the sycamore plantings be replaced with Eastern cottonwood (Populus deltoids), because of their importance to the riverine ecosystem and because natural cottonwood regeneration along the river has stagnated. Following the existing plan, which states, “allowing cottonwoods to naturally regenerate on the lowest areas.” Without planting new ones, may result in a lack of cottonwoods on the island due to poor natural regeneration.

Response 2: Sycamore is included in the 60% design-level planting plan as a way to provide a long-term vegetation strategy that considers species migration in response to climate change. The recommendation to partially incorporate Eastern cottonwood in place of sycamore will be considered as part of the 90% design plans.

Comment 3: The plans for a restored Hall’s Island show riprap will be used. If possible, a more natural approach is desired, as riprap provides little habitat value and is unattractive. If riprap is used, adding vegetation would increase its habitat value. We recommend adding live stakes between the rocks, or creating lines of vegetation by adding shrubs, sedges, rushes, etc. within the riprap matrix.

Response 3: The use of riprap in island construction is necessary to protect the island from erosion and portions of the side channel from scour due to river velocities and fluctuating water levels. Riprap will primarily be placed below the ordinary high level and under typical circumstances will not be visible. Bioengineering methods, including vegetated reinforced soil slopes, are included in upper portions of the project shoreline to provide a more naturalized form of erosion protection.

Comment 4: Pages 6-8 lay out MPRB’s proposed strategy for construction sequencing. The approach of dredging out the middle, then the downstream end and then finally the upstream end makes sense. This will minimize sediment being released into the water, however there could be some pitfalls. This approach requires that low water conditions persist long enough to complete the in-stream work. With rain and flooding becoming more
frequent, we would like to see a contingency or emergency response plan created in the event of unexpected high flows during winter months.

Response 4: The contractor awarded the contract for this project will be responsible for ensuring that construction is completed in a manner that minimizes sediment transport into the Mississippi River, to the extent practicable, under a variety of uncertain weather conditions.

Comment 5: We strongly support the project purposes of ecological benefits, community connections and recreation.

Response 5: Comment noted.

Comment 6: Table 2 on page 10 shows that there will be an increase in lawn/landscaping cover from 0.3 to 3.5 acres. We would like to see the use of no-mow short or native short-grass prairie instead of turf. A suggested alternative for the turf area could be a short grass prairie with an abundance of forbs for pollinators, or even some small pollinator gardens or patches interspersed with turf.

Response 6: Comment noted. This increase in lawn/landscaping cover type is due to the planned conversion of the current vacant lot/sparse vegetation cover type to vegetated park land on the Scherer Site. The planting plan for upland portions of the Scherer Site will be developed as part of a future phase as funding becomes available.

Comment 7: We agree with the assessment in sections 9 through 20 that the impacts from this project will be largely positive, and that negative impacts to water resources, fish, wildlife, sensitive ecological features, historic properties, air quality and neighborhood livability will largely be temporary and of little to no long-term consequence.

Response 7: Comment noted.

Agency Comments – Minnesota Department of Transportation, received 3/28/2017

Comment 1: The Minnesota Department of Transportation (MnDOT) has reviewed the Scherer Site and Halls Island Reconstruction site plans and has no comments, as the proposed project should have little or no impact on MnDOT’s highway system.

Response 1: Comment noted.

Environmental Issue Summary

Based on the information contained in the EAW and in the written comments received, the Scherer Site and Hall’s Island Reconstruction project does not create significant environmental issues. Adverse impacts to the environment would all only be temporary in nature and related to project construction. Long-term effects are beneficial to both the natural and human environments.

Comparison of Potential Impacts with Evaluation Criteria under Minnesota Rules

In deciding whether a project has the potential for significant environmental effects and whether an Environmental Impact Statement (EIS) is needed, the RGU (MPRB) must consider the impacts that may
be reasonably expected to occur from the project with four criteria by which potential impacts must be evaluated (Minnesota Rules, Part 4410.1700, Subp. 7A through 7D).

A. Type, extent, and reversibility of environmental impacts

Based upon information provided in the EAW and the responses to public and agency comments, including the comments provided by the MNDNR, MPCA, NPS, and FMR, the MPRB concludes that the potential environmental effects of the project will be limited in extent, temporary, or reversible. In general, long-term project effects are beneficial both to the natural and human environments.

B. Cumulative potential effects. The RGU shall consider the following factors: whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project.

The Scherer Site and Hall’s Island Reconstruction project is not dependent on the initiation or development of any other project. Development of the Scherer Site park and restoration of Hall’s Island is a priority project of RiverFirst, serving as an entry point to the Mississippi River, Mississippi East Bank Trail, and upper river regional park system.

The EAW does not address potential future development of Parcel D as it would occur under a separate process, independent from this project and is thus not a connected action. While the Parcel D project is geographically proximate to the project, it and this project are not considered phased actions, as neither Parcel D nor this project is a prerequisite for the other.

For each of the environmental effects listed in the EAW and Responses to Comments, the Scherer Site and Hall’s Island Reconstruction project would potentially contribute to only minor increases in cumulative potential effects on the project area relative to other contributors. There are no related projects affecting this proposed project area at this time that would result in significant cumulative impacts when combined with the proposed project.

C. The extent to which environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU may rely on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project.

Mitigation of any impacts from the project will be achieved through design and inclusion of best management practices (BMPs), or regulations currently in place, including permit approvals, enforcement of regulations, or other programs as listed here in the table:
<table>
<thead>
<tr>
<th>Unit of Government</th>
<th>Permit/Approval</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Army Corps of Engineers</td>
<td>Section 404/Section 10 Permit</td>
<td>Required for placement of fill in Mississippi River in order to construct island.</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service</td>
<td>Section 7 Concurrence</td>
<td>Concurrence that the project will not affect threatened or endangered species. Accompanies USACE permit.</td>
</tr>
<tr>
<td>State Historic Preservation Office</td>
<td>Section 106 Concurrence</td>
<td>Concurrence that the project will not affect historic/cultural resources. Accompanies USACE permit.</td>
</tr>
<tr>
<td>Minnesota Pollution Control Agency</td>
<td>Section 401 Water Quality Certification</td>
<td>Approval that the project will not contribute to long-term water quality concerns.</td>
</tr>
<tr>
<td></td>
<td>NPDES/SDS Construction Stormwater Permit</td>
<td>Permit to control and treat construction-related stormwater.</td>
</tr>
<tr>
<td></td>
<td>Response Action Plan</td>
<td>Plan for managing contaminated materials during site development.</td>
</tr>
<tr>
<td>Minnesota Department of Natural Resources</td>
<td>Work in Public Waters Permit</td>
<td>Required for island construction in the Mississippi River, which is identified as a state public water.</td>
</tr>
<tr>
<td>MN Office of State Archaeologist</td>
<td>Project Approval</td>
<td>Approval that the project will not affect historic/cultural resources.</td>
</tr>
<tr>
<td></td>
<td>Preliminary Development Review</td>
<td>Review of project for adherence with City design and development standards.</td>
</tr>
<tr>
<td></td>
<td>Conditional Use Permit</td>
<td>Required to develop park in area zoned medium industrial.</td>
</tr>
<tr>
<td></td>
<td>No-Rise Certificate</td>
<td>Demonstrates that project will not result in an increase in flood elevations.</td>
</tr>
<tr>
<td>City of Minneapolis</td>
<td>Right-of-Way Permit</td>
<td>For work under Plymouth Avenue Bridge.</td>
</tr>
<tr>
<td></td>
<td>Bridge Engineer Approval</td>
<td>For project activities that take place beneath the Plymouth Avenue Bridge.</td>
</tr>
<tr>
<td>MPRB</td>
<td>Construction Permit</td>
<td>Required for construction activity on MPRB land.</td>
</tr>
<tr>
<td></td>
<td>Maintenance Agreement</td>
<td>Define maintenance responsibilities between MPRB and City of Minneapolis</td>
</tr>
</tbody>
</table>

D. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EIS’s.

No other environmental effects, other than what is noted in the EAW, are anticipated. Environmental effects related to project construction, including stormwater management and invasive species control, can be controlled per the results of the following studies:


**Decision on the Need for an Environmental Impact Statement**

Minnesota Rules 4410.0300, Subp. 3. Purpose, states (in part):

*Environmental documents shall not be used to justify a decision, nor shall indications of adverse environmental effects necessarily require that a project be disapproved. Environmental documents shall be used as guides in issuing, amending, and denying permits and carrying out other responsibility of governmental units to avoid or minimize adverse environmental effects and to restore and enhance environmental quality.*

Minnesota Rules 4410.0300, Subp. 4. Objectives, further sets forth:

*The process created by parts 4410.0200 to 4410.6500 is designed to:*

A. *Provide usable information to the project proposer, governmental decision makers, and the public concerning the primary environmental effects of a proposed project;*

B. *Provide the public with systematic access to decision makers, which will help to maintain public awareness of environmental concerns and encourage accountability in public and private decision making;*

C. *Delegate authority and responsibility for environmental review to the governmental unit most closely involved in the project;*

D. *Reduce delay and uncertainty of the environmental review process, and*

E. *Eliminate duplication.*
Based on the Environmental Assessment Worksheet and related documentation for the Scherer Site and Hall’s Island Reconstruction project, the Minneapolis Park & Recreation Board, as the Responsible Governmental Unit (RGU) for this environmental review, makes the following conclusions:

1. The Environmental Assessment Worksheet and related documentation for the Scherer Site and Hall’s Island Reconstruction project were prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minnesota Rules, Parts 4410.1000 to 4410.1700.

2. The record demonstrates that implementation of this project does not have the potential for significant environmental effects. Therefore, the MPRB makes a Negative Declaration and does not require the preparation of an Environmental Impact Statement (EIS) for the Scherer Site and Hall’s Island Reconstruction Project.

Attached Exhibits:

A. Public and Agency Comments
B. Figure 1
Exhibit A:

Public and Agency Comments
Mr. Duesman,

I am writing to say that I am very excited to see that the MPRB has decided to move ahead with this project. I look forward to the day when parkland lines the banks of the Mississippi River from north to south throughout all of Minneapolis.

My comments in regards to this project are as follows:

1. Prioritize the environment, with a high value put on returning as much land as possible to its historic, natural state and protecting native endangered wildlife such as monarch butterflies and other pollinators
2. Encourage equity by making this land accessible and usable by people of all means and backgrounds
3. Provide for a variety of physical activities for people of all ages and abilities, especially in ways that connect people to nature.

I was part of the CAC for the SSAMP and was very impressed with Adam Arvidson and the entire MPRB team. I believe strongly in the mission and the vision of our park board and am confident that it will continue with this exciting project.

Best Regards,

Sean O'Brien
smdobrien@gmail.com
(612) 597-9515
6028 10th Ave S
Minneapolis, MN 55417
Return Halls Island to a natural state. Native plants only. Let the river be a river.
Thanks
Jacqueline Rodkewich
1603 Adams St Ne
Minneapolis Mn
55413
Dear Jon Duesman,

I’m a Marcy-Holmes resident (601 Main Street SE, #434) who regularly walks along that stretch of the river with my wife. I support, wholeheartedly and without reservation, the Hall’s Island restoration project as outlined in the EAW.

A few comments:

- The goals for the project appear clear, feasible, interconnected, and laudable
- The pedestrian footbridge is a fine idea, especially, too, in combination with the the riparian bench which "would be constructed such that it would not be attractive or easy for users to access the island from the water to protect habitat.”
- The varied uses for the proposed site are worth thinking through carefully; "Additional public amenities that may be included at the Scherer Site include boat rental and storage for paddlers, a farmer’s market area, a park-supportive café pavilion, and terraced gathering spaces to be programmed throughout the seasons.” Two comments: 1) try to be careful that the uses are not inconsistent with maintaining a sense of the serenity and naturalness of the area, i.e., don’t “overload” the site with activity and 2) consider how uses out of season might be encouraged.
- I realize that the neighboring area is out of scope, but it would help to clarify what this sentence in the EAW actually implies: "Commercial development in this location would aid in activating and financially supporting the operations of the park. Parcel D development would occur under a separate process and is not included with the currently proposed Scherer Site and Hall’s Island project.” My concern, as you might anticipate, is that in seeking a source of financial support for the Hall’s Island project, compromises might be made that ultimately imperil and degrade the goals set out in the EAW.

Again, a notable project with many valuable long-term benefits for the surrounding communities, etc.

All best,

Jon Binks

Jonathan Binks
Innovating Minds for Change
innovatingminds4change.com
612-379-3402 (home)
612-655-2165 (cell)
From: Dvorak, Hilary A. [mailto:Hilary.Dvorak@minneapolismn.gov]
Sent: Friday, March 17, 2017 2:11 PM
To: Duesman, Jon
Cc: Strehlo, Jeremy T.; Stout, Elizabeth A.
Subject: Comments on the Scherer Site and Hall's Island Reconstruction EAW

Jon,

Below are the comments from the City’s comments on the Scherer Site and Hall’s Island Reconstruction EAW.

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
<th>Item</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>11</td>
<td>City of Minneapolis - PDR</td>
<td>Floodplain permitting is primarily completed through the City’s land use application and review, not through PDR.</td>
</tr>
<tr>
<td>11</td>
<td>18</td>
<td>.. Regional groundwater flow is from west-southwest toward the Mississippi River.</td>
<td>Verify direction of groundwater flow is from west-southwest.</td>
</tr>
<tr>
<td>11.b.ii</td>
<td>19</td>
<td>Stormwater Management</td>
<td>The project appears to trigger the City’s stormwater management requirements. There appears to be 0.5 acres of post-construction impervious surfaces proposed (Table 2). Please address compliance with the City’s stormwater management requirements.</td>
</tr>
<tr>
<td>11.b.iii</td>
<td>20</td>
<td>Water appropriation</td>
<td>The EAW does not specifically state dewatering during construction will not be necessary. Please verify if this is the case. If dewatering of groundwater would be needed, discuss potential for contamination and appropriate dewatering measures.</td>
</tr>
<tr>
<td>----------</td>
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<td>---------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>45</td>
<td></td>
<td>Cumulative potential effects</td>
<td>Clarify that the stormwater associated with Parcel D could tie into the Minneapolis storm sewer system rather than sanitary sewer system,.</td>
</tr>
<tr>
<td>Figures</td>
<td></td>
<td>Figure 8</td>
<td>There is also a City storm sewer located on the south side of 8th Ave NE, potentially in the Project Area. This should be identified and addressed if impacted.</td>
</tr>
<tr>
<td>Plans</td>
<td></td>
<td>Existing City storm sewer outfall</td>
<td>The existing storm sewer outfall on the south side of 8th Ave NE appears to outlet directly at the proposed Lighthouse Bridge east abutment. The outfall should be located in relation to any proposed improvements to allow access and not create conflicts between the flows and infrastructure.</td>
</tr>
</tbody>
</table>

Thank you for the opportunity to comment. Hilary

Hilary Dvorak | Principal City Planner | City of Minneapolis | CPED – Land Use, Design and Preservation
250 South 4th Street | Room 300 | Minneapolis, MN 55415
Phone: 612-673-2639 | Fax: 612-673-2526 | hilary.dvorak@minneapolismn.gov
The City’s website is now: www.minneapolismn.gov
Minnesota Department of Natural Resources
Ecological and Water Resources
1200 Warner Road
St. Paul, MN 55106

March 20, 2017

Michael Schroeder
Construction Project Manager
2117 West River Road
Minneapolis, MN 55411

Re: Scherer Site and Hall’s Island Reconstruction EAW

Dear Mr. Schroeder,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment Worksheet (EAW) for the Scherer Site and Hall’s Island Reconstruction project. We offer the following comments.

The EAW correctly notes that a DNR Work in Public Waters Permit will be required for the proposed excavation, fill, and bridge crossings, as well as a FEMA Conditional Letter of Map Revision and City Floodplain Permit. The document provides a thorough analysis of potential adverse impacts and proposed mitigation methods, but additional information, including an alternatives analysis may be required as part of the Work in Public Waters permit application process.

Regarding mussels species, we would like to note that we have released other mussel species that are not listed in the EAW below Lock and Dam 1, and fish could have conceivably brought juveniles upstream prior to the Upper St. Anthony lock closure. Those include the federally endangered winged mapleleaf (Quadrula fragosa), MN Threatened spike (Elliptio dilatata), mucket (Actinonaias ligamentina) and washboard (Megalonaias nervosa). We have not seen evidence for this during any of our recent surveys, but it is possible that they are present.

Thank you for the consideration of our comments. Feel free to contact me with any questions (keith.parker@state.mn.us or 651-259-5635).

Sincerely,

Keith Parker, Regional Director

CC: Mike Davis (River Ecologist), Kate Drewry (Area Hydrologist), Rebecca Horton (Region Environmental Assessment Ecologist), Liz Harper (Assistant Regional Manager), Terri Yearwood (Regional Manager)
March 22, 2017

Mr. Michael Schroeder
Assistant Superintendent for Planning Services
Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411

Re: Scherer Site and Hall's Island Reconstruction Environmental Assessment Worksheet

Dear Mr. Schroeder:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Scherer Site and Hall's Island Reconstruction project (Project) located in the city of Minneapolis, Hennepin County, Minnesota. The Project consists of restoration of the island and creation of a riverfront park. Minnesota Pollution Control Agency (MPCA) staff has reviewed the EAW and have no comments at this time.

We appreciate the opportunity to review this Project. Please provide the 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 via email at Karen.kromar@state.mn.us or via telephone at 651-757-2508.

Sincerely,

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

KK:bt

cc: Dan Card
    Teresa McDill, MPCA, St. Paul
March 22, 2017

Michael Schroeder
Assistant Superintendent for Planning Services
Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411

RE: Environmental Assessment Worksheet: Scherer Site and Hall’s Island Reconstruction

Dear Michael Schroeder,

The National Park Service (NPS), Mississippi National River and Recreation Area (MNRRA), has reviewed the draft Environmental Assessment Worksheet (EAW) prepared for the Scherer Site and Hall’s Island Reconstruction. MNRRA was designated by Congress in 1988 to “preserve, protect and enhance the significant values of the Mississippi River and to provide for orderly public and private development in the Twin Cities metro area.”¹ The entire project is located within the MNRRA and the resulting habitat and recreational improvements are largely consistent with the policies set forth by our Comprehensive Management Plan (CMP).

The restoration of Hall’s Island and establishment of an eight acre riverfront park at the former Scherer Site would be a great benefit to the Mississippi River. The project would convert a former industrial site in the upper river of Minneapolis into an environmentally focused park with the potential to establish new diverse aquatic and terrestrial habitats, and enhanced recreational and interpretive opportunities. The project viewed cumulatively within the environmental, recreational and economic visions set forth in the Above the Falls and RiverFirst Plans paints a picture of a future healthy, vibrant, and natural riverfront that will support the economic and cultural vitality of the upper river in Minneapolis.²

You will find our specific comments regarding the EAW on the following pages. If you have any questions, please contact my planner, Rory Stierler at 651-293-8440.

Sincerely,

John O. Anfinson
Superintendent

¹ Public Law 100-696, Title VII(b).
² City of Minneapolis, Above the Falls Master Plan, June 2013 and Minneapolis Park and Recreation Board, RiverFirst: A Park Design and Implementation Plan for the Upper Riverfront, March 2012
Section 6(b.) - p. 7
Three future pedestrian bridges are mentioned. The north bridge is planned to be the longest constructed with four span segments and the placement of three piers in the new side channel. Is there potential for the three piers and/or narrow exit of the side channel to present safety risks to paddlers, boats, or park users during high flow events?3

Section 6(d.) - p. 8
In this section it is stated that, “The proposed project is driven by three key components:

- Ecological Benefits, protecting and supporting a diverse range of native terrestrial species and,
- Ecological Benefits, protecting and supporting a diverse range of native terrestrial and aquatic species and,”

It should be noted that the project would benefit aquatic species as well.

Table 2 - p. 10
The table provides a comparison summary of cover types before and after the project. In the table, the cover types of “lawn” and “landscaping” are combined into one. They should be distinguished from each other and the amount of lawn in the final project should be minimized given the habitat focus of the project. By listing these separately, the amount of new habitat created would be better understood.

<table>
<thead>
<tr>
<th>Cover Type</th>
<th>Before</th>
<th>After</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands</td>
<td>0.0</td>
<td>0.4</td>
</tr>
<tr>
<td>Deep water/streams</td>
<td>0.1</td>
<td>0.5</td>
</tr>
<tr>
<td>Wooded/forest</td>
<td>0.0</td>
<td>2.8</td>
</tr>
<tr>
<td>Brush/grassland</td>
<td>0.0</td>
<td>1.4</td>
</tr>
<tr>
<td>Cropland</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Lawn/landscaping</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Impervious Surface</td>
<td>0.9</td>
<td>1.1</td>
</tr>
<tr>
<td>Stormwater Pond</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Other – Vegetation</td>
<td>0.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Total Area</td>
<td>12.2</td>
<td>12.3</td>
</tr>
</tbody>
</table>

Section 9(a.)(ii.) - p. 12-14
The Comprehensive Management Plan (CMP) for the Mississippi National River and Recreation Area (MNRRA) should be recognized and described in this section. There is suggested text below:

“The Comprehensive Management Plan (CMP) for the Mississippi National River and Recreation Area (MNRRA) provides a policy framework for coordinated efforts to protect and interpret the nationally significant resources of the corridor and for analyzing other federal, state, or local plans and individual actions in the area. The CMP’s primary policies include (1) the preservation and enhancement of

3 Mississippi National River and Recreation Area, Comprehensive Management Plan, Visitor Use Management (6), “Assess the adequacy of visitor safety and enforcement in the corridor. Increased user safety, especially in the urban areas of the river corridor, will be a high priority for plan implementation.” p. 40
environmental values of the area, (2) enhanced public outdoor recreation opportunities in the area, (3) the conservation of protection of the scenic, historical, cultural, natural, and scientific values of the area, and (4) the commercial use of the area and its related natural resources, consistent with the protection of the values for which the area was established.”

Section 19(c.) - p. 45
Stormwater impacts are not anticipated with this project, but it is noted that the development of Parcel D could require stormwater management. The EAW states that “stormwater associated with Parcel D would either be tied in to the Minneapolis municipal sewer system or addressed in another suitable manner as determined by the MPRB, any development partners for the project, and City of Minneapolis stormwater rules.

Since the overall project is habitat focused, a commitment should be made to using BMPs to minimize stormwater impacts. This could be done by committing to implement the performance goals within the Minimal Impact Design Standards (MIDS) developed by the Minnesota Pollution Control Agency (MPCA).

Figure 4
The depiction of the recreated island implies completion in 2014. It should be changed to 2018.

---

4 Mississippi National River and Recreation Area, Comprehensive Management Plan, p. 4
March 21, 2017

Michael Schroeder, Assistant Superintendent for Planning Services
Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411

RE:  Minneapolis Park and Recreation Board Environmental Assessment Worksheet (EAW) – Scherer Site and Hall’s Island Reconstruction
Metropolitan Council Review No. 21680-1
Metropolitan Council District No. 8

Dear Mr. Schroeder:

The Metropolitan Council received the EAW for the Scherer Site and Hall’s Island Reconstruction project in Minneapolis on February 17, 2017. The proposed project site is located upstream of the Plymouth Avenue Bridge on the east bank of the Mississippi River. The proposed project consists of 11.4 acres with plans for park development and island reconstruction on 8 acres, with undetermined future commercial and/or residential uses on the remaining land.

The staff review finds that the EAW does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes. However, the EAW would benefit from additional information providing clarity regarding the Scherer site as an element of the larger Above the Falls Regional Park. Above the Falls Regional Park is part of the metropolitan regional parks system that is governed and protected by the Metropolitan Council’s 2040 Regional Parks Policy Plan.

Council staff recommends that revisions be made to the EAW; and we offer the following comments for your consideration.

Item 6b – Project Description (Jan Youngquist, 651-602-1029)
The EAW should provide the context that a portion of the Scherer site is within Above the Falls Regional Park. Because that portion of the site is designated as regional parkland, acquisition of the land was eligible for Minnesota Legacy Parks and Trails Fund and the Metropolitan Council’s Regional Park Acquisition Opportunity Fund grants. The EAW should clarify that the site was also acquired with Metropolitan Council bonds. This section references the 2013 Draft Above the Falls Regional Park Master Plan. Please note that this master plan has not been approved by the Metropolitan Council, which is required prior to implementation of the plan. However, the Metropolitan Council approved a separate amendment to the Above the Falls Regional Park Master Plan in September 2014, which addresses the restoration of Hall’s Island and the development of Scherer Park. This amendment should be explained in the EAW.

Item 6b – Project Description (Jim Larsen, 651-602-1159)
The plan is to ultimately make the proposed island accessible by boardwalk trail and bridges from the east bank, and by canoe along over half its eastern bank. This creates challenges for the indicated main project goals of maintaining the island as a natural habitat environment and migratory bird flyway stopover location.
The emergent island will only be an average of 100-125 feet in width when the Mississippi River (River) is at ordinary high water level, and would be completely submerged during a 100-year return frequency flood event. The proposed construction elevation of the boardwalk at approximately two feet above grade across the length of the island will place a small portion of the boardwalk above the 100-year return frequency flood elevation of 808 feet, while most the boardwalk will be below the water level. The proposed north access bridge from the eastern river bank, as well as either end of the boardwalk, will protrude above the water level at that flood stage, making it especially vulnerable to damage from floating debris moving downstream during high water periods.

While the stated intent of the future boardwalk component of the island reconstruction project is to “limit pedestrian access (from the boardwalk to other parts of the island) as a means of protecting habitat,” it is extremely doubtful that efforts to limit island ‘exploring’ will be very successful. If supplied with a boardwalk down its entire length and a gravel beach along half its east-facing length, the island will present itself as an attractive opportunity for sightseeing.

If the ultimate intent is for all island visitors to remain on the boardwalk at all times, planned signage must make that position very clear. Night access should be prevented, or a development of footpaths and accumulation of trash will take place throughout the island, quickly deteriorating its fragile ecosystem and detracting its ability to function as a ‘drawing card’ for either migrating songbirds or refuge for ‘a diverse range of native terrestrial species.’

**Item 6d – Project Description (Jan Youngquist, 651-602-1029)**
This section should indicate that Hall’s Island and a portion of the Scherer site are part of Above the Falls Regional Park, which is component of the metropolitan regional parks system, rather than the “Minneapolis regional park system.”

**Item 9ai – Land Use (Jan Youngquist, 651-602-1029)**
The EAW describes a number of parks that are in the vicinity of the Scherer site. For context, this section should recognize that these parks are components of Above the Falls Regional Park and Central Mississippi Riverfront Regional Park to relate to discussions of these regional parks in other portions of the EAW. Additionally, a map showing the Scherer site, Above the Falls and Central Mississippi Riverfront Regional Parks, and the Mississippi East Bank Trail should be added to the EAW.

**Item 9a(ii) – Land Use (Jan Youngquist, 651-602-1029)**
This section references the 2013 Draft Above the Falls Regional Park Master Plan. Since that plan has not been approved by the Metropolitan Council, the section should be revised to discuss the proposed project’s consistency with the 2014 Above the Falls Regional Park Master Plan Amendment (Business Item No. 2014-231), which has received Metropolitan Council approval for the restoration of Hall’s Island and the development of Scherer Park.

The EAW references the Metropolitan Council’s 2030 Regional Parks Policy Plan and the 2030 Regional Development Framework. These documents are no longer in effect and have been replaced by the 2040 Regional Parks Policy Plan and Thrive MSP 2040, respectively. An analysis of how the project is consistent with these policy documents should be included in the EAW and the reference to these documents should be revised.
Item 9aii – Land Use (Michael Larson, 651-602-1407)
This section references the Minneapolis Plan for Sustainable Growth (2009), the comprehensive plan for the City of Minneapolis. It mentions the Open Spaces and Parks Chapter, which discusses strategies for expanding access to the Mississippi River in a manner that implements the Above the Falls Master Plan. The EAW should be revised to address the guiding land use for the Scherer Brothers site, which is currently guided as Transitional Industrial. When the City updates its comprehensive plan, the guiding land use should be consistent with the updated regional park boundary and use, as well as the planned non-park uses on Parcel D. If development precedes the update, it may require a comprehensive plan amendment. In either case, the Metropolitan Council will evaluate the amendment for consistency with Council policies and for conformance with the 2040 Regional Parks Policy Plan.

Item 19 – Cumulative Potential Effects (Jan Youngquist, 651-602-1029)
References to the 2013 Draft Above the Falls Regional Park Master Plan and the 2030 Regional Parks Policy Plan throughout this section should be revised to reflect the 2014 Above the Falls Regional Park Master Plan Amendment and the 2040 Regional Parks Policy Plan as described above.

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 Michael Larson, Principal Reviewer, at 651-602-1407.

Sincerely,

[Signature]

LisaBeth Barajas, Manager
Local Planning Assistance

CC: Steve O’Brien, MHFA
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Cara Letofsky, Metropolitan Council District 8
Michael Larson, AICP, Sector Representative / Principal Reviewer
Raya Esmaeili, Reviews Coordinator

N:\CommDev\LPA\Agencies\MPRB\letters\2017 MPRB EAW Scherer Site and Hall’s Island.docx
March 22, 2017

Mr. Michael Schroeder
Minneapolis Park & Recreation Board
2117 West River Road
Minneapolis, MN 55411

RE: EAW – Scherer Site and Hall’s Island Reconstruction
T29 R24 S15 SE, Minneapolis, Hennepin County
MnHPO Number: 2017-1247

Dear Mr. Schroeder:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the above referenced project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

It is our understanding that the Minneapolis Park & Recreation Board (MPRB) is proposing the restoration of Hall’s Island and the establishment of a riverfront park on the former Scherer Brother’s Lumber Company site located on the east bank of the Mississippi River.

As you are aware, a part of the proposed project, specifically the area south of the Plymouth Avenue Bridge, is located within the boundary of the St. Anthony Falls Historic District, a historic property which is listed in the National Register of Historic Places. We have reviewed proposed project documentation as included in the EAW, the Project Overview and 60% Design Plans (dated 12/12/2016) and it is our opinion that the project, as currently proposed, will not adversely affect the St. Anthony Falls Historic District.

In regards to archaeological resources, we have reviewed the information included in the EAW and we have determined that the potential for intact archaeological resources within the project area is low and therefore we believe that no further archaeological investigation is warranted.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

Sarah J. Beimers, Manager
Government Programs and Compliance
March 22, 2017

Mr. Jon Duesman, Construction Project Manager
Minneapolis Park & Recreation Board
2117 West River Road N
Minneapolis, MN 55411

Re: Environmental Assessment Worksheet for Scherer Site and Hall’s Island Reconstruction

Mr. Duesman:

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities region. We represent thousands of people in the metropolitan area who care deeply about what happens around the river, including a growing membership of over 2,400 people and more than 6,000 volunteers engaged in 2016. FMR was founded in 1993 to provide a voice for the river and newly formed National Park – The Mississippi National River and Recreation Area (MNRRA).

FMR has been an active participant in planning for new parks and trails along the river in north and northeast Minneapolis since 1998. We participated in the working group that put together Minneapolis’ Above the Falls Master Plan and Vision, and we have played a leadership role on the Above the Falls Community Advisory Committee (AFCAC) since its inception in 2001. Working in collaboration with AFCAC and other community organizations, we also participated as a stakeholder in the development of the RiverFirst Plan.

In addition, we have two professional ecologists on staff that develop management plans and conduct ecological restoration at more than 30 natural area sites in the Twin Cities. Their input on the planting plan is included in this letter.

We highly value our strong relationship with MPRB and the trust that has been established between our organizations. We currently have a five-year MOU with MPRB to conduct restoration at Olson Park in north Minneapolis and the Mississippi River Gorge in south Minneapolis. Additionally, FMR and MPRB enter a park stewardship agreement annually that outlines our work to engage several hundred volunteers at river restoration sites on MPRB land. In that spirit of cooperation and shared goals, we offer the following comments on the EAW.
In general, we are very satisfied with the information provided in the EAW document. We commend MPRB for doing their due diligence to examine potential impacts to the Mississippi River environment and we do not think an EIS is warranted.

6. Project Description
The document (page 6) states, "Once island construction is complete, upland portions would be vegetated with native, habitat-supportive herbaceous seed mixes, shrubs, and trees, and temporary erosion control measures installed; vegetation maintenance would be required for up to five years or until performance standards established by permitting are met."

However, the Planting Plan in Appendix A, L-04 shows sycamore (Platanus occidentalis L) plantings, which are not native to Minnesota. Given the fact that sycamore trees are native in Iowa and Wisconsin and their inclusion may be in pursuit of an assisted migration strategy for this species (in response to climate change), we can support this species being planted. We would like to recommend, however, that 50 percent of the sycamore plantings be replaced with Eastern cottonwood (Populus deltoides), because of their importance to the riverine ecosystem and because natural cottonwood regeneration along the river has stagnated. Following the existing plan, which states, "allowing cottonwoods to naturally regenerate on lowest areas," without planting new ones, may result in a lack of cottonwoods on the island due to poor natural regeneration.

The plans for a restored Hall's Island show riprap will be used. If possible, a more natural approach is desired, as riprap provides little habitat value and is unattractive. If riprap is used, adding vegetation would increase its habitat value. We recommend adding live stakes between the rocks, or creating lines of vegetation by adding plugs of shrubs, sedges, rushes etc. within the riprap matrix.

Pages 6-8 lay out MPRB’s proposed strategy for construction sequencing. The approach of dredging out the middle, then the downstream end and then the finally the upstream end makes sense. This will minimize sediment being released into the water, however there could be some pitfalls. This approach requires that low water conditions persist long enough to complete the in-stream work. With rain and flooding becoming more frequent, we would like to see a contingency or emergency response plan created in the event of unexpected high flows during the winter months.

We strongly support the project purposes of ecological benefits, community connections and recreation.

7. Cover Types
Table 2 on page 10 shows that there will be an increase in lawn/landscaping cover from 0.3 to 3.5 acres. We would like to see the use of no-mow short or native short-grass prairie instead of turf. A suggested alternative for the turf area could be short grass prairie with abundance of forbs for pollinators, or even some small pollinator gardens or patches interspersed with turf.
We appreciate the changes to land cover that will take place as a result of this project, such as reducing the amount of vacant lot/sparse vegetation, limiting the increase in impervious surface and the addition of new wetlands, grasslands and woodlands.

We agree with the assessment in sections 9 through 20 that the impacts from this project will be largely positive, and that negative impacts to water resources, fish, wildlife, sensitive ecological features, historic properties, air quality and neighborhood livability will largely be temporary and of little to no long-term consequence.

With the addition of this island and several acres of restored habitat, most of the environmental impacts from this project will be positive in nature. Healthy native plant communities are needed in northeast Minneapolis, and where feasible, these opportunities are essential to improving the quality of life for wildlife and nearby residents as well as other park visitors.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions.

Sincerely,

Irene Jones
River Corridor Program Director

Cc:
President Anita Tabb
Commissioner Liz Wielinski
Assistant Superintendent Michael Schroeder
March 28, 2017

Jon Duesman
Construction Project Manager
Minneapolis Parks and Recreation Board
2117 West River Road
Minneapolis, MN 55411

SUBJECT: Scherer Site and Halls Island Reconstruction
MnDOT Review # EAW17-005
North of 8th Avenue NE and West of Sibley Street NE
Minneapolis, Hennepin County
Control Section 2726

Dear Mr. Duesman:

Thank you for the opportunity to review the EAW for the Scherer Site and Halls Island Reconstruction. The Minnesota Department of Transportation (MnDOT) has reviewed the above-referenced site plan and has no comments, as the proposed project should have little or no impact on MnDOT’s highway system.

As a reminder, for new development activity, such as plats and site plans, please send those documents to:

Development Review Coordinator
MnDOT - Metro Division
Waters Edge
1500 West County Road B-2
Roseville, Minnesota 55113

Review Submittal Options:
MnDOT’s goal is to complete the review of plans within 30 days. Submittals sent in electronically can usually be turned around faster. There are four submittal options. Please submit either:

1. One (1) electronic pdf. version of the plans. MnDOT can accept the plans via e-mail at metrodevreviews.dot@state.mn.us provided that each separate e-mail is under 20 megabytes.

2. Three (3) sets of full size plans. Although submitting seven sets of full size plans will expedite the review process. Plans can be sent to:

MnDOT – Metro District Planning Section
Development Reviews Coordinator
1500 West County Road B-2
Roseville, MN 55113

An equal opportunity employer

MnDOT Metropolitan District, Waters Edge Building, 1500 County Road B2 West, Roseville, MN 55113
3. One (1) compact disc.

4. Plans can also be submitted to MnDOT’s External FTP Site. Please send files to: ftp://ftp2.dot.state.mn.us/pub/incoming/MetroWatersEdge/Planning Internet Explorer doesn’t work using ftp so please use an FTP Client or your Windows Explorer (My Computer). Also, please send a note to metrodevreviews.dot@state.mn.us indicating that the plans have been submitted on the FTP site.

If you have any questions concerning this review, please contact me at (651) 234-7797.

Sincerely,

Cameron Muhic
Senior Planner

Copy sent via E-Mail:
Patrick Phenow, Freight and Commercial Vehicle Operation
Russ Owen, Metropolitan Council
Exhibit B:

Figure 1
Figure 1: Above the Falls Regional Park Map and Boundary